

Date: May 3, 2013

To: IRRC

3004

From: LaVerne Russell, OTR/L, PT, DPT
Director Clinical Operations

Re: Comments on Proposed Occupational Therapy Regulations

Thank you for considering the Pennsylvania OT Regulations as they have been revised and greatly improved by the Occupational Therapy Board, Department of State.

In my original comments at the time of first introduction (2011) I suggested that the requirement to have continuing competence activities in two different types of activity areas would be burdensome on some clinicians especially those that are only working part-time, are new in their career, or raising a family. For these individuals the ability to complete these requirements through educational courses and online activities assist them in keeping current in their field without adding the burden of having to do additional activities. I had also noted that many clinicians may not have the opportunity to participate in the activities that were designated dependent on the geography in which they practice. With the original stringent proposed ruling it could have had the potential of negatively impacting clinician's choice to remain in the profession further depleting an already tight workforce and the consumer's access to care.

The revised regulations allows the clinician to choose the activities that they feel will assist them in keeping current and active in their field, educational course completion being one of them. For those who participate in other area they are given the opportunity to get credit for these different professional activities. This is in keeping with many of the other states that have gone to continuing competence such as Maryland.

I greatly appreciate the changes and improvements that have been made to these regulations and support them in their present form.

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