

August 9, 2018

Ms. Paula Pullano
Rhode Island Department of Health
3 Capitol Hill
Providence, RI 02908-5097

RE: Proposed amendments to 216-RICR-40-05-12

Dear Ms. Pullano:

The American Occupational Therapy Association (AOTA) is the national professional association representing the interests of more than 213,000 occupational therapists, occupational therapy assistants, and students of occupational therapy, including 343 in Rhode Island. The practice of occupational therapy is science-driven, evidence-based, and enables people of all ages to live life to its fullest by promoting health and minimizing the functional effects of illness, injury, and disability. AOTA supports the Rhode Island Board of Occupational Therapy Practice in its mission to protect the health, safety, and welfare of Rhode Island consumers and the authority of the Board to create regulations to achieve this mission.

On behalf of AOTA, I am writing to provide comment on the Board's proposed revisions to 216-RICR-40-05-12. AOTA respectfully requests the creation of a new Category V of continuing education for competency assessment and knowledge/skills assessment activities.

AOTA is not opposed to the Board giving licensees credit towards continuing education requirements by accepting activities sponsored by NBCOT or available via the NBCOT Navigator. However, while the Navigator is a suite of competency assessment tools, AOTA believes it does not fit into any of the acceptable categories of continuing education currently listed in the rules.

Competency assessment activities available through the NBCOT Navigator do not provide the opportunity for interaction with a program presenter. Rather, they are self-guided activities designed to assess an occupational therapist's or an occupational therapy assistant's competency and/or skill level. This is different from a self-study course or self-directed continuing education activity, where a licensee is given a topic to review and study and then is tested on their knowledge. The accumulation of knowledge is important, but does not necessarily mean that the licensee is also competent in a certain practice area.

If it is the Board's desire to allow OTs and OTAs to claim credit toward the continuing education requirement by completing competency assessment activities, then we request that a new Category V be created to allow credit for such activities. We also believe that Board should create a broad category for these activities so that other providers in addition to NBCOT can be recognized as providers of assessment activities and that the credit awarded be the same as that for Category II. Finally, we believe that the new category should include a broad range of activities from "competency assessment" to "knowledge/skills assessment activities."

Our proposed amendment is below:

Category V: Competence assessment or knowledge/skills assessment activities completed online or in-person.	Credit: One (1) continuing education contact hour for each hour completed or One (1) competency assessment unit (CAU) for each hour completed.
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Thank you for the opportunity to comment on the proposed changes and for considering our proposed amendment. Please contact me at kneville@ota.org or 240-800-5981 if you have questions or need additional information about AOTA's position.

Sincerely,



Kristen Neville
Manager, State Affairs

cc: Randal Fedoruk, Rhode Island Occupational Therapy Association President



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Rhode Island Department of Health
3 Capitol Hill
Providence, RI 02908-5097

RE: Proposed amendments to 216-RICR-40-05-12

Dear Ms. Pullano:

The Rhode Island Occupational Therapy Association (RIOTA) represents occupational therapists and occupational therapy assistants in the state of Rhode Island. RIOTA strives to represent, advance, and advocate for the profession and practice of occupational therapy.

On behalf of RIOTA, I am writing to provide comment on the Board’s proposed revisions to 216-RICR-40-05-12. RIOTA supports the amendment to include Rhode Island Occupational Therapy Association and the National Board for Certification in Occupational Therapy (NBCOT) as a provider of continuing education. Furthermore, RIOTA supports the amendment put forth by AOTA to create a new Category V to allow credit for competency assessment activities available through the NBCOT navigator.

The proposed amendment is below:

Category V: Competence assessment or knowledge/skills assessment activities completed online or in-person.	Credit: One (1) continuing education contact hour for each hour completed or One (1) competency assessment unit (CAU) for each hour completed.
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Please note that our organization supports the amendments noted above however RIOTA does not support having the practice act opened at this time.

Thank you for the opportunity to comment on the proposed changes. Please contact me at rfedoruk@neit.edu or 917 279 0906 if you have questions or need additional information about RIOTA’s position.

Sincerely,

Randal Fedoruk OTD, OTR/L
Rhode Island Occupational Therapy Association, President