

NEOTEC

New England Occupational Therapy Education Council

June 29, 2015

Peter M. Kelly, Esq
Board Counsel
Board of Registration in Allied Health Professionals
1000 Washington Street, Suite 710
Boston, MA 02118-6100

Dear Mr. Kelly and Board members:

On behalf of the NEOTEC Steering Committee, we request the Board of Registration in Allied Health Professionals revise the current statute and regulations for occupational therapy, specifically regarding supervision requirements for OT and OTA students to reflect national practices and more closely align with Accreditation Council for Occupational Therapy Education (ACOTE) standards. We recognize that the Board of Registration in Allied Health Professionals establishes rules and regulations to ensure the integrity and competence of licensees and is responsible for their enforcement with the ultimate purpose of preventing harm to consumers and protecting the public. The Occupational Therapy (OT) and Occupational Therapy Assistant (OTA) educational programs throughout Massachusetts, as well as our accrediting body (ACOTE), share this common purpose.

We are aware of the formal request by the Massachusetts Association of Occupational Therapy (MAOT), Inc., written on June 30, 2015, outlining the changes in education and practice as rationale for updating the current regulations and statutes. We are in support of the Board adopting and approving language outlined in the current Accreditation Council for Occupational Therapy Education (ACOTE) Standards (2011) regarding student supervision. Doing so would enable non-OT on-site supervisors to affiliate with the academic program and in the case of full-time settings, co-supervise the student with a currently licensed occupational therapist with at least 3 years of experience who is on-site a minimum of 8 hours per week. To ensure the protection of consumers, the ACOTE Standards identify "qualified personnel" to serve as student supervisors, including, but not limited to "currently licensed occupational therapist and occupational therapy assistants, psychologists, physician assistants, teachers, social workers, nurses, and physical therapists." <http://www.aota.org/-/media/Corporate/Files/EducationCareers/Accredit/Standards/2011-Standards-and-Interpretive-Guide.pdf>

As a consortium of member Occupational Therapy Educational Programs, we are dedicated to supporting the academic and clinical aspects of Occupational Therapy Education. We are invested in working with the Board to enhance the quality of fieldwork education and supervision. We request that the Board expedite changes to update the supervisory requirements to align with national and ACOTE standards and language, reflective of contemporary education and practice. Thank you for your consideration of these proposed changes and revisions. Please feel free to contact the NEOTEC Co-Chairs with any feedback regarding this request.

Sincerely,

NEOTEC Co-Chairs:

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