

April 9, 2013

Good afternoon. I am Dr. Wendy Wood, professor and head of the occupational therapy program at Colorado State University and have been an occupational therapist since 1975.

There are two main reasons why I am here today to offer my strongest possible support to the OT licensure bill:

- One: to ensure that consumers of occupational therapy services receive the highest possible level of protection from inauthentic, incompetent, and harmful services delivered under the name of occupational therapy; and
- Two, to ensure that the state and federal government pay only for authentic skilled occupational therapy services that deliver promised benefits, especially as healthcare reform accelerates and more taxpayer dollars are invested in Medicare, Medicaid and other programs.

**Were this licensure bill not to pass or were OT to revert only to title protection, it would dangerously undermine achievement of both outcomes in my opinion.**

I'd like first to address the issue of consumer protection.

The occupational therapy educational program at Colorado State has two direct service arms that provide skilled occupational therapy services to returning veterans from Iraq and Afghanistan who are CSU students.

These student veterans suffer from severe orthopedic injuries, traumatic brain injuries and post-traumatic stress disorders, sometimes all three.

One student recently provided public testimonial to the fact that the occupational therapy services he received at Colorado State were the reason why he did not to take his own life, but instead choose to pursue his dreams and persist as a college student so that he might embark on a rewarding career.

OT practitioners at Colorado State are, in other words, quite literally not only giving meaning and purpose to people's lives, but saving lives. Without their highly skilled practice, it is clear that some lives would have been lost to despair if not suicide.

My point is this: An underlying assumption of the Sunset review was that the absence of many found instances of harm provided unequivocal evidence that outdated, substandard or otherwise incompetent practices of occupational therapy simply doesn't happen in Colorado and don't really constitute harm.

I think this assumption is wrong.

I can assure you that there are certified occupational therapists who we would never hire to practice at Colorado State precisely because they were certified long ago and showed little evidence of having kept up with the field.

Furthermore, there are practice settings in which we refuse to send students for fieldwork education precisely because interventions used at those sites are so out of date and so far from what would be considered an acceptable practice of occupational therapy today.

The truth is that, short of obvious injurious harm or severe negligence, consumers of OT services are not equipped to evaluate the quality of the services that they receive, let alone report harm in the form of incompetent or ineffectual OT services, or in the form of wasted health care dollars, to DORA.

Yet I believe that such practices exist in in Colorado, and a strong licensure bill is the best way to protect consumers.

It also bears mention that occupational therapy fully matches the description of professions with the highest level of public protection afforded by licensure described in the 2012 Sunset Review.

No different than physical therapy, which presently has licensure protection in Colorado, occupational therapy is a complex practice that requires licensure throughout practitioners' careers.

In 2007, the Accreditation Council for Occupational Therapy Education mandated that all occupational therapy programs be at the graduate level owing to the growing complexities and scope of practice.

To be accredited at present, occupational therapy programs must demonstrate minimal compliance with over 200 standards.

To pass the certification examination of the National Board for Certification of Occupational Therapists, graduates must demonstrate minimal competence related to these standards.

**However, certification by the National Board reflects only minimal entry-level competence based on minimal educational standards.**

OTs who were certified some time ago, or those out of practice, could maintain their certification by reporting that they have undergone a required number of continuing education hours.

**Yet the National Board for the Certification of Occupational Therapist has no criteria for evaluating or monitoring the quality of continuing education applicants claim to have attended and therefore very little ability to oversee and ensure continued competence.**

Passage of this licensure bill is the best way forward to begin to communicate that Colorado takes the competency of occupational therapists seriously.

Lastly, I would like to note that the state of Colorado has invested taxpayer money in occupational therapy education at Colorado State University since 1945.

This investment has made it possible for CSU's occupational therapy program to grow its enrollment and ensure continuous improvement of its curriculum and educational outcomes.

Due to this sustained investment, CSU graduates far exceed national averages in pass rates on the certification examination and many are offered positions in stated based on their excellent performance during fieldwork.

Owing to its educational excellence, the program is now ranked 6<sup>th</sup> in the United States out of over 150 programs nationwide.

So you may ask, why isn't this good enough? Your program has good educational outcomes, so why is a licensure law needed? Why not simply title protection?

In addition to the justifications for the licensure that I have already given, my other answers are this:

- A title protection law that falls far short of licensure is inconsistent with Colorado's sustained investment in excellent occupational therapy education for over 6 decades.
- Furthermore, title protection would, I believe, act as a disincentive for some of our excellent graduates to launch their careers in Colorado. This is because, as one of only two states nationally that does not license occupational therapists, it would be clear to our graduates that their profession is not valued in Colorado
- In the absence of a licensure law, therefore, I believe many of CSU's excellent graduates will choose to migrate to states where they know that the complexity and impact of occupational therapy are valued and, accordingly, that many safeguards are place—through licensure—to prevent incompetent and inauthentic practices.

Thank you for your attention and considerations of my comments.