

**From:** [Sunset Advisory Commission](#)  
**To:** [Janet Wood](#)  
**Subject:** FW: Sunset Advisory Commission Staff Report of the Texas Board of Physical Therapy Examiners  
**Date:** Friday, April 22, 2016 4:13:33 PM

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**From:** Brant Capps [mailto:Brant.Capps@bsahs.org]  
**Sent:** Friday, April 22, 2016 3:42 PM  
**To:** Sunset Advisory Commission  
**Subject:** Sunset Advisory Commission Staff Report of the Texas Board of Physical Therapy Examiners

Sunset Advisory Commission Staff,

Thank you for the time and efforts you have made in reviewing the practice of physical therapy in the state of Texas and for your review of the effectiveness of the Texas Board of Physical Therapy Examiners (TBPTE). I completely agree with the recommendations to continue the ECPTOTE, TBPTE, and TBOTE as outlined in section 4.1. I believe that this board has demonstrated outstanding performance in both oversight of the practice of physical therapy as well as efficient and effective management of the licensing and renewal processes.

However, I would like to voice my concern over the criticism of the of the TBPTE's selection of the TPTA as a body to administer the Continuing Competence Approval Program (CCAP) I have been a licensed Physical Therapist in Texas for over 20 years and was at one time, a reviewer for the CCAP program. From a licensee perspective, I can tell you the approval process prior to the current CCAP process was not as meticulous. The continuing education programing in the state often reflected the lack of rigorous review which left us dissatisfied with the level of training and watered down the evidenced based clinical competence that a doctoring profession demands. As a volunteer reviewer in the continuing competence program, I can assure you that the review of potential CCAP program was thorough and met or exceeded the standards established by the TBPTE. I believe that the TBPTE selected the Texas Physical Therapy Association (TPTA) to administer the Continuing Competence Approval Program (CCAP) because of its ability to meet the TBPTE continuing competency program standards, and for its ability to provide licensees with relevant, evidenced based, best-practice information for clinical skill updates. I think that the volunteer nature of the expert review panels within the CCAP program allow the state to continue manage this process in a cost-effective manner while maintain authority and oversight.

From the recommendations of the Sunset Advisory Commission Staff report, my concern is that the recommendation appears to be that the TBPTE take back the CCAP program. In my experience, the TBPTE lacks the resources, qualified staff, and infrastructure to effectively manage this program effectively and would ask that the SAC reconsider making revisions to a program that works so effectively to meet the ongoing competency needs of licensed Physical Therapists and Physical Therapist Assistants in the State of Texas.

Therefore, I support issue 4 of the SAC recommendations but oppose issue 3. I believe that the TBPTE should retain its current ability to delegate the continuing competency review and approval to the TPTA or other entities that meet the standards established by and required under the supervision of the TBPTE.

Thank you for your consideration,

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