

From: [Sunset Advisory Commission](#)
To: [Janet Wood](#)
Subject: FW: Public Input Form for Agencies Under Review (Public/After Publication)
Date: Tuesday, June 21, 2016 1:44:48 PM

-----Original Message-----

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]
Sent: Tuesday, June 21, 2016 12:22 PM
To: Sunset Advisory Commission
Subject: Public Input Form for Agencies Under Review (Public/After Publication)

Agency: TEXAS BOARD PHYSICAL THERAPY EXAMINERS

First Name: Mary

Last Name: Daulong

Title: Physical Therapist

Organization you are affiliated with: N/A representing my self

Email: daulongm@bcmscomp.com

City: Houston

State: Texas

Your Comments About the Staff Report, Including Recommendations Supported or Opposed:

I am in SUPPORT of the Sunset Commission's recommendation to allow reciprocity of physical therapy licensees by its participating in the National Licensure Compact. I see this affirmative recommendation as particularly important to our facilities that are in border counties as they could benefit from having a larger applicant pool to fill licensee positions.

I have been licensed in Texas for over forty years and currently am self employed as a healthcare compliance consultant. This role affords me the opportunity to work with many physical therapists through the country where the lack of reciprocity is definitely an anomaly.

As the committee is most likely aware, there is a high demand for physical therapists in Texas; our rural areas seem to have more recruiting difficulties than our urban areas. The rural clinics and facilities could benefit considerably if therapists in other states, and particularly contiguous states, could be hired without having to go through the licensing application process which is not only lengthy but is also an additional cost which could be avoided.

I, again, voice my support for the TBPTE's participating in the National Licensure Compact which allows licensees to have reciprocity in Texas.

Mary R. Daulong, PT, CHC, CHP

Any Alternative or New Recommendations on This Agency: No new or alternate recommendations

My Comment Will Be Made Public: I agree

From: [Sunset Advisory Commission](#)
To: [Janet Wood](#)
Subject: FW: Public Input Form for Agencies Under Review (Public/After Publication)
Date: Tuesday, June 21, 2016 11:28:54 AM

-----Original Message-----

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]
Sent: Tuesday, June 21, 2016 11:23 AM
To: Sunset Advisory Commission
Subject: Public Input Form for Agencies Under Review (Public/After Publication)

Agency: TEXAS BOARD PHYSICAL THERAPY EXAMINERS

First Name: Mary

Last Name: Daulong

Title: Physical Therapist

Organization you are affiliated with: N/A

Email: daulongm@bcmscomp.com

City: Houston

State: Texas

Your Comments About the Staff Report, Including Recommendations Supported or
Opposed:

OPPOSED to moving the Continuing Competence Approval Program (CCAP) Program back to the TBPTE as well
OPPOSED to any statutory restrictions related to operational contracts that the TBPTE would enter into to facilitate
its effectiveness.

I am a physical therapist licensed in Texas for more than forty years. While I no longer clinically practice I have and
will continue to keep my license active and therefore could be impacted by the recommendation to move the
Physical Therapy Continuing Competence Approval Program (CCAP) back to the Texas Physical Therapy Board of
Examiners (TBPTE).

I was a member of the TBPTE in 2000 when we voted to award the administration of CCAP to the Texas Physical
Therapy Association (TPTA). The rationale for that vote was based on the fact that professional courses should be
reviewed and approved by content experts, in the field, and the TBPTE did not and still does not have that
capability. The TPTA pledged to and has delivered on their agreement to have content experts readily available so
that the review and approval process could be thorough and efficient, which it is.

I recently applied, for the first time in Texas, to have a course, I am teaching, approved through the CCAP program;
the process left no stone unturned. The requirements were clearly stated and while the application process was
lengthy it was very user-friendly. The software allowed for the uploading of required support and qualification
documents rather than requiring manual text entries; this was a definite time saver for me as an applicant. I am not
aware of what type of investment the TBPTE would have to make to implement an application process as that of
the TPTA but I would think it would be quite costly. Another positive feature of the TPTA administered CCAP
program is that the TPTA has dedicated staff to assist with questions about the program, courses, etc. I don't
believe the TBPTE should be weighted down with these matters when its primary focus should be on licensing,
investigating and enforcing the Practice Act and Rules.

It is my understanding that many states grant course approval for physical therapy continuing educational course in their jurisdictions based on whether the course has achieved Texas CCAP approval; I believe this is a testament to the respect the current CCAP system has garnered. TPTA clearly has finely tuned this program which is based on competency standards established and enforced by TBPTE. The TBPTE has not abdicated its responsibility but rather demonstrated prudent task delegation.

I, respectfully, request that you reconsider your recommendation to uproot an effective and efficient program as I am definitely an opponent of that action.

Mary R. Daulong, PT, CHC, CHP
Houston, Texas

Any Alternative or New Recommendations on This Agency: No Alternate Recommendation

My Comment Will Be Made Public: I agree

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BUSINESS & CLINICAL MANAGEMENT SERVICES, INC.

April 22, 2016

Texas Sunset Advisory Commission
Regarding: Staff Report on the Texas Board of Physical Therapy & Occupational
Therapy Examiners

Dear Sunset Advisory Commission Staff:

Thank you for giving me the opportunity to respond to the Sunset Advisory Commission's Staff Report (REPORT) on the Executive Council of Physical Therapy and Occupational Therapy Examiners. I do agree and applaud you for recognizing that the ECPTOTE is a well-functioning board and that its current independent agency structure should be maintained. While I realize this REPORT, is just that, I urge you to support that recommendation when our legislators vote on this matter.

I am very concerned, however, about the recommendation to move the Physical Therapy Continuing Competence Approval Program (CCAP) back to the Texas Physical Therapy Board of Examiners (TBPTE). I was a member of the TBPTE in 2000 when we voted to award the administration of CCAP to the Texas Physical Therapy Association (TPTA). The rationale for that vote was based on the fact that professional courses should be reviewed and approved by content experts, in the field, and the TBPTE did not and still does not have that capability. The TPTA pledged to and has delivered on their agreement to have content experts readily available so that the review and approval process could be thorough and efficient, which it is.

I recently applied, for the first time in Texas, to have a course, I am teaching, approved through the CCAP program; the process left no stone unturned. The requirements were clearly stated and while the application process was lengthy it was very user-friendly. The software allowed for the uploading of required support and qualification documents rather than requiring manual text entries; this was a definite time saver for me as an applicant. I am not aware of what type of investment the TBPTE would have to make to implement an application process as that of the TPTA but I would think it would be quite costly. Another positive feature of the TPTA administered CCAP program is that the TPTA has dedicated staff to assist with questions about the program, courses, etc. I don't believe the TBPTE should be weighted down with these matters when its primary focus should be on licensing, investigating and enforcing the Practice Act and Rules.

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on competency standards established and enforced by TBPTE. The TBPTE has not abdicated its responsibility but rather demonstrated prudent task delegation. I respectfully, request that you reconsider your recommendation to uproot an effective and efficient program as I am definitely an opponent of that action.

My final comment is on the retirement of Facility Registration. While I do agree that it appears to have little regulatory benefit I believe that it has thwarted the proliferation of facilities that have no accountable physical therapist employed and I am certain that if the registration provision was enhanced it could be a great tool to prevent fraud and abuse. I do, however, agree that penalizing employees of an unregistered facility is unnecessary and that sanctions for this reason, alone, should be expunged.

Thank you, again for allowing me to voice my opinion.

Mary R. Daulong, PT, CHC, CHP (Texas PT for 46 years)
President/CEO, Business & Clinical Management Services, Inc.
15814 Champion Forest Drive # 240
Spring, Texas 77379