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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.

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 fine tuned this program which is based

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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