

From: [Sunset Advisory Commission](#)
To: [Janet Wood](#)
Subject: FW: Public Input Form for Agencies Under Review (Public/After Publication)
Date: Thursday, June 23, 2016 8:13:55 AM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]
Sent: Wednesday, June 22, 2016 8:22 PM
To: Sunset Advisory Commission
Subject: Public Input Form for Agencies Under Review (Public/After Publication)

Agency: TEXAS BOARD PHYSICAL THERAPY EXAMINERS

First Name: Mandy

Last Name: Dinkin

Title:

Organization you are affiliated with:

Email:

City: Irving

State: Texas

Your Comments About the Staff Report, Including Recommendations Supported or Opposed: TBPTE Self-Evaluation Issue 20 – Repeal of the Referral Requirement for PT Treatment

Any Alternative or New Recommendations on This Agency:

Texas is one of just three states that require a referral for physical therapy treatment, while allowing treatment from a chiropractor, podiatrist, massage therapist, acupuncturist or a personal trainer for injuries without a referral. Under state law, Texans are prohibited from receiving physical therapy treatment unless they first obtain a referral from a designated provider, such as a physician, chiropractor, physician assistant, podiatrist, or dentist. This is despite the fact that state law already requires that all patients be evaluated and assigned a diagnostic classification by a physical therapist at the start of their care. The referral requirement is an arbitrary and unnecessary restriction to patient access, which does nothing more than limit a patient's healthcare provider decisions while increasing their wait times and expense.

Physical therapy treatment without a referral is proven to be safe.

Currently, 47 states allow PT initiation of treatment without a referral. In addition, physical therapists in the U.S. Military have been able to treat soldiers, and their beneficiaries, without referral since 1973. Time and again this practice has been shown to be a safe and effective way to return soldiers to duty in less time.

CNA Insurance Company, a leading liability insurer of physical therapists, states "...direct access is not a risk factor that we specifically screen for in our program because it has not negatively impacted our claims experience in any way. In addition, we do not have a premium differential for physical therapist[s] in direct access states, nor do our competitors – a strong testament to the fact that direct access to physical therapy services has not increased the risk exposure presented by physical therapists."

In addition, studies have shown the cost effectiveness of direct patient access to physical therapy services. A 2011 study shows decreased patient costs associated with direct patient access. The average cost for direct access patients was \$347 compared to \$420 on average for physician-referred patients.^{xiv} Another report studied an approach taken by the Virginia Mason Medical Center, in conjunction with Aetna and employers such as Starbucks, to reduce the cost for low back pain treatment. As a result of having the patient meet immediately with a physical therapist

and physician, the average cost for treatment was reduced from \$2,100-\$2,200 to \$900-\$1,100. Finally, an analysis of Blue Cross- Blue Shield claims showed that the total paid claims for physician referral episodes to physical therapy was 123% higher than the paid claims for direct access episodes. In addition, physician referral episodes were 65% longer and resulted in 60% more office visits than direct access episodes.^{xvi} The repeal of the referral requirement would not change the scope of practice for a physical therapist (PT) – PTs would still be limited to the same provisions under the Physical Therapy Practice Act. Physical therapists would NOT replace physicians, and PTs would still be prohibited from practicing medicine. Insurance companies would NOT be mandated to reimburse for treatments without a referral, nor would it change payment regulations for Worker’s Compensation or Medicaid. The repeal, however, would allow patients to access a physical therapist without incurring additional costs or unnecessary delays in treatment, which would benefit all Texans.

My Comment Will Be Made Public: I agree