

**From:** [Sunset Advisory Commission](#)  
**To:** [Janet Wood](#)  
**Subject:** FW: Opposition to Discontinue Facility Registration  
**Date:** Friday, April 22, 2016 8:00:49 AM

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**From:** Henry C. Ebem  
**Sent:** Thursday, April 21, 2016 10:27 PM  
**To:** Sunset Advisory Commission  
**Subject:** Opposition to Discontinue Facility Registration

To Whom it May Concern,

Ref: Issue No.1 -  
The Requirement to Register Physical Therapy and Occupational Therapy Facilities Is Unnecessary.

I am opposed to the "Key Recommendation to Discontinue the registration of physical and occupational therapy facilities". Facility registration is essential for both patient protection and fraud prevention. If the scope of its implementation include monitoring standards of facilities, policies and procedures it will ensure that Texans receive appropriate physical therapy services. Also, if the Boards are required to maintain list of such approved facilities, many payers, especially Auto Insurance Company will certainly prevent fraudulent claims of physical therapy services by illegal practices that does not meet the standards. The Sunset Staff need to benchmark similar facility registration requirement for the State of Massachusetts, and recommend that both PT & OT board expand the scope of implementing the facility registration rule to be detailed enough to provide both benefit of patient protection and fraud prevention. This will be the most rational thing to do than to call for its discontinuation, which loses the essence of the regulation as originally intended and can be implemented to meet that goal.

Please find attached the following:

## **Consumer Affairs and Business Regulation**

### **259 CMR 6.00: Physical Therapy Facilities**

**Henry C. Ebem, M.Sc. PT. CEAS.**  
**Mitroo, LLC.**

["Use me, God. Show me how to take who I am, who I want to be, and what I can do, and use it for a purpose greater than myself."](#)

~ Martin Luther King Jr.

["Do not be afraid, little flock; for it has pleased your Father to give you the Kingdom"](#)

~Luke 12:32