

From: [Sunset Advisory Commission](#)
To: [Janet Wood](#)
Subject: FW: Sunset Advisory Commission Suggestions/Comment
Date: Wednesday, April 20, 2016 5:20:09 PM

From: Virginia Ellis
Sent: Wednesday, April 20, 2016 5:02 PM
To: Sunset Advisory Commission
Subject: Sunset Advisory Commission Suggestions/Comment

Dear Commission Members:

I am responding to a request to comment on suggested changes to the Texas Executive Council of Physical Therapy and Occupational Therapy Examiners. I am a Physical Therapist Assistant of 20 years that currently practices in Corpus Christi, Texas. As background, I would also tell you that I teach Continuing Education courses to various Rehab professionals and have done so for 9 years, as well as being a clinician. I have also had licensure in 9 different states in the past as a traveling PTA.

Issue 1

The Requirement to Register Physical Therapy and Occupational Therapy Facilities Is Unnecessary.

I agree with this recommendation and understand how it does not protect our patients nor further our profession. Although it may bring in funds, it certainly does not seem functional to protect our target population or our practice.

Issue 2

The Physical and Occupational Therapy Statutes Unnecessarily Impede Increasingly Mobile Workforces.

I agree with recommendations for both adopting the Physical Therapy Compact and providing clear statutory authority for licensure by endorsement. I have a history of travel therapy and it would be a blessing to allow therapists to float to where they are needed without the burden of time and paperwork—plus it would seem this *may* streamline the work for our board.

Issue 3

Key Elements of the Boards' Statutes, Rules, and Policies Do Not Conform to Common Licensing Standards.

3.1 I agree with the recommendations for this sub-section.

3.2 I do not agree with the suggestion to remove the boards' authority to delegate to other entities the responsibility of approving continuing education and continuing competence. The issue with this is that our board is already under threat to cut staff due to a budget that does not increase while the number of patients/therapists they serve continues (and will continue) to increase. The PT Board simply does not have the infrastructure, expertise or time to do this task. It is my understanding that the board continues to monitor the TPTA's Continuing Competency Approval Program (CCAP) and may mandate changes as they see fit—this program was a product of the board and a professional organization's collaboration (circa 1999). The current emphasis on evidence-based practice and specialty areas could/would not be addressed by an unskilled administrative staff member who is already over-burdened with licensure and regulatory tasks. I would also note here that the TOTA also approves continued competency and courses and has modeled its program similar to TPTA. As an alternate suggestion, I might say that changing the way non-approved courses are approved by review (including the cost) could help to decrease financial burden on people attending courses that may or may not be relevant to the PT profession.

3.3-3.8 I agree with all suggested changes for these subsections.

Issue 4

The State Has a Continuing Need to Regulate Physical Therapy and Occupational Therapy.

I agree with your recommendation to continue with the joint board due to fiscal and regulatory considerations. I applaud your thorough research and comparisons and would suggest that the ECPTOTE be given a matrix budget that considers the number of licensees and tasks that they are required to accomplish. The concern of a trip hazard due to worn carpet or poor, outdated computers seems a travesty when this agency does plenty in terms of additions to the Texas State budget annually. It is no surprise that our agency is struggling when their out-dated budget does not reflect the numbers of license applications/renewals, and the corresponding number of complaints associated with the increased number of licensees- expanding yearly.

In summary, I thank the Commission for it's out-reach requesting comment and suggestions and would love to stay in the loop. I also volunteer to teach Ethics to PT/PTAs and treasure our PT Board's information on the status of PT in the great State of Texas. As aforementioned, I have a history of traveling therapy, but I always came back to Texas- until I stayed over 10 years ago- and it's not just because I was born here.

Very truly yours,

“Dee” Virginia Ellis, PTA, LMT, CKTI