

**From:** [Sunset Advisory Commission](#)  
**To:** [Janet Wood](#)  
**Subject:** FW: Public Input Form for Agencies Under Review (Public/After Publication)  
**Date:** Wednesday, April 20, 2016 1:58:19 PM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]  
Sent: Wednesday, April 20, 2016 1:52 PM  
To: Sunset Advisory Commission  
Subject: Public Input Form for Agencies Under Review (Public/After Publication)

Agency: EXECUTIVE COUNCIL PHYSICAL THERAPY AND OCCUPATIONAL THERAPY EXAMINERS

First Name: Karen

Last Name: Gardner

Title: Occupational Therapist

Organization you are affiliated with:

Email:

City: Leander

State: Texas

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

I have read the Commission's report on ECPTOTE, TBOTE, and TBPTE.

Issue 1: I absolutely agree that the registration of OT and PT facilities does not benefit the public and is an unnecessary burden on therapists and facility owners.

Issue 2: I agree that there is an urgent need to clarify and simplify the Texas licensure requirements. Therapists are required to be licensed by their national boards, for OTs that is the National Board for Certification in Occupational Therapy, Inc. (NBCOT). This agency regulates initial testing, licensing, and monitoring of ongoing continuing education. It is burdensome to have to duplicate this information and CEU tracking with two agencies. TBOTE should require proof of acceptable renewal with NBCOT and that should be sufficient!

Issue 3: I agree with the recommendation that TBPTE no longer be able to assign CEU approval to TPTA. It is an inappropriate relationship. While I am not a PT, I do teach continuing education courses around the US and Texas has a very complicated and expensive system for approval of CEUs. Most therapists comment that this is simply to get money and it is definitely not seen as a professional level regulation.

Not clear about the need for fingerprinting, unless that is a requirement for other health professionals. Again, a step that does not seem to improve public health care, so long as therapists can exhibit their licenses.

Issue 4: I accept (not agree) that there needs to be a continuance of these regulatory agencies until a new system can be in place, but there needs to be some requirement that a process for transition and accountability be in place to ensure that the end result will be successful.

Any Alternative or New Recommendations on This Agency:

The ECPTOTE, TBOTE, TBPTE are necessary for maintaining a register of licensed therapists, but their current level of oversight is unnecessary and burdensome.

Recommend creating a register of therapists who can provide proof of current licensure by their national organizations which includes acceptable continuing education that encourages ongoing professional development. This should be sufficient to increase access to care, clarify compliance and protect public health.

My Comment Will Be Made Public: I agree