

From: [Sunset Advisory Commission](#)
To: [Janet Wood](#)
Subject: FW: Public Input Form for Agencies Under Review (Public/After Publication)
Date: Monday, June 20, 2016 8:18:03 AM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]
Sent: Sunday, June 19, 2016 11:15 PM
To: Sunset Advisory Commission
Subject: Public Input Form for Agencies Under Review (Public/After Publication)

Agency: TEXAS BOARD PHYSICAL THERAPY EXAMINERS

First Name: Amy

Last Name: Goddard

Title: Physical Therapist

Organization you are affiliated with: N/A

Email: amy@gosportstherapy.com

City: Coppel

State: Texas

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

My name is Amy Goddard, PT, DPT, OCS, CSCS. I have practiced physical therapy in Texas since 1995, and am representing only myself as a PT professional.

I fully support the Sunset Commission's recommendation that the Texas Board of PT Examiners join the national Licensure Compact for the following reasons: Allowing licensees in a compact member state to utilize "compact privilege" to practice in Texas without having to obtain and maintain a Texas license will help alleviate the shortage of PTs in Texas. Three other healthcare professions currently utilize "compact privilege" in TX--nurses (since 1999), advanced practice registered nurses (2006), and emergency medical services personnel (2015). The PT Licensure Compact will be enacted once 10 states adopt the compact. Those states will be invited to draft the regulations governing the compact, and Texas would be well-served if it were amongst the ten.

I oppose Recommendation 3.2 to Remove the TBPTE's Authority to Delegate Continuing Competence Approval for the following reason: The TBPTE and TPTA worked together in 1999 to develop the CCAP program, which was reviewed and approved by the Attorney General's office. Since 2000, the CCAP program has ensured that Continuing Competency courses meet Board-designated standards by utilizing 109 highly-qualified PT reviewers in 22 specialty areas that evaluate each proposed CC course. Other Continuing Competency programs were considered, but it was found that they did not meet the TBPTE standards.

They continue to consider new approval entities as they come forward. The CCAP is administered by TPTA on behalf of the TBPTE (and has for the last 16 years without questions or complaints), who lacks the resources, infrastructure, and clinical expertise to do so. It is common practice for CC approvals to be outsourced by Texas licensing boards. The TPTA's course provider status is reviewed and decided by TBPTE and not by the CCAP reviewers. All of these points demonstrate that the TBPTE is committed to protecting the public through stringent administration of licensees' CC requirements.

Thank you for your consideration,
Amy Godddard, PT, DPT, OCS, CSCS
Coppell, TX

Any Alternative or New Recommendations on This Agency: None.

My Comment Will Be Made Public: I agree