

From: [Sunset Advisory Commission](#)
To: [Janet Wood](#)
Subject: FW: Sunset Advisory Commission - April 2016 - Physical Therapy
Date: Monday, April 18, 2016 8:11:21 AM

From: barry
Sent: Saturday, April 16, 2016 8:43 PM
To: Sunset Advisory Commission
Cc: smather@tpta.org; Mike Connors
Subject: Sunset Advisory Commission - April 2016 - Physical Therapy

To the Texas Sunset Advisory Commission,

As a Physical Therapist practicing in Texas for 25 years, I feel it is my duty to comment on the recommendations found in your April 2016 report.

Issue 1: I agree with the recommendation to discontinue the registration need for facilities providing physical or occupational therapy in Texas. Conversation with my peers over the years finds this appears to be an opportunity to collect registration fees with no real consequences for the organizations; the responsibility of safe/ethical practice falls solely on the shoulders of the therapist, not the organization. There is significant revenue generated through the clinician licensing fees so this extra cost appears unnecessary.

Issue 2: I agree with the recommendation to adopt the Physical Therapy Licensure Compact. The need to adhere to each state's licensure requirement to provide the service of physical therapy creates an unnecessary burden on the clinician that practices in multiple jurisdictions. Similar to driving across state lines and agreeing to adhere to that state's established rules and regulations, the physical therapist can assume the professional responsibility of adhering to requirements in the state where they opt to offer services without having to complete multiple and varying state requirements for multiple licensure renewals.

An inherent dilemma to Compact Licensure is the requirement to adhere to each state's continuing education requirements for practicing in that state -- all states have varying levels of education requirements so consistency in continuing education competence offerings in varying jurisdictions would be beneficial/ideal. Although licensure maintenance is expected for the "Home" state for the therapist, this creates a potential dilemma with Issue 3.

Issue 3: I commend the TPTA for taking the initiative in assuring educational opportunities are adequate for maintaining professional licensure standards. I feel they are still working on the process since it still takes several months for approval and still there are courses that are questionable at best when approved - at least the TPTA collected their application fees. I am not sure how closely the Executive Council of Physical and Occupational Therapy Examiners monitors this process. But there are other options that can be considered, especially if Issue 2 is accepted, that recognize educational opportunities in multiple jurisdictions.

Currently the TPTA does not have reciprocal recognition of continuing education offerings from other states. They do have a short list of nationally recognized vendors that have paid for the right to provide educational offerings in Texas. But similar to the comments by the Sunset Advisory Commission on how facility registration becomes a burden to the solo

practitioner or small business owner, there are multiple courses that have been identified to be above standard in other jurisdictions that cannot be recognized for licensure requirements only because they have not paid a fee to be approved by the TPTA - the same fee across multiple jurisdictions is not feasible by a small business owner.

Therefore, if a Texas physical therapist exercises the ability to travel to another Compact participating jurisdiction for an extended period of time and participates in continuing education offerings in that state, it is likely Texas will not recognize that educational offering.

This will result in the therapist either paying fees to have a course recognized in Texas or having to return to Texas to take the recognized courses to meet licensure needs.

Example: ProCert is a service of the Federation of State Boards of Physical Therapy that currently provides the service of completing a thorough review of a vendors educational offerings at pre established rates and in a timely manner (weeks instead of months).

Currently recognized in over 20 United States jurisdictions, it appears using ProCert would complement the Physical Therapy Licensure Compact recommendation if Issue 2 is approved.

This will likely be discouraged by the TPTA since it removes a revenue source from their financial statement, but the volunteer Board of Directors and voting members should focus on what is best for the membership, especially if the Licensure Compact is approved. It would be ideal to complete an educational offering in a Compact Licensure state and apply it to educational requirements for licensure maintenance. Use of ProCert can allow this if utilized.

Issue 4: I strongly agree that the Texas State Board of Physical Therapy and Occupational Therapy Examiners should remain under the administration of the Executive Council of Physical and Occupational Therapy Examiners. Just like other health care services, there currently is not another 'umbrella' agency that best understands the services provided by these disciplines.

Thank you for the opportunity to provide feedback on the Sunset Advisory Commission's April 2016 report.

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Texas Physical Therapist since 1991

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