

**From:** [Sunset Advisory Commission](#)  
**To:** [Janet Wood](#)  
**Subject:** FW: Comments: Physical Therapy Board Sunset Staff Report  
**Date:** Thursday, April 21, 2016 12:17:23 PM

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**From:** Tim Lyons  
**Sent:** Thursday, April 21, 2016 12:09 PM  
**To:** Sunset Advisory Commission  
**Subject:** Comments: Physical Therapy Board Sunset Staff Report

Staff....first, let me thank you for your time and due diligence in continuing to assure the safety of Texas citizens.

As a practicing physical therapist and a national leader in the physical therapy profession, **I oppose Recommendation 3.2: Remove the boards' authority to delegate to other entities the responsibility of approving continuing education and continuing competence while clarifying their authority to pre approve course providers.**

I recommend the Board retain current statutory authority to delegate review and approval of continuing competence activities to APPROPRIATE outside entities while maintaining ultimate authority for the continuing education program.

As a practicing physical therapist and TPTA Board member in the 1990's, the TPTA Board received multiple complaints from its members regarding the appropriateness and quality of approved continuing education activities. These complaints signaled a concern regarding the ability of the continuing education program to ensure continued competence of physical therapy practitioners and the ability to protect the public. At that time, the process for approving continuing education activities was the responsibility of a TBPE clerk with no experience or knowledge in physical therapy. In 1999, TPTA and TBPE worked together to develop a program for improving the process of approving continuing education activities which would benefit both the licensees and the public. The CCAP program that was developed was reviewed by the Texas Attorney Generals Office and meets the ongoing requirements for continued competence set forth by the TBPE.

The TBPE continues to maintain authority for continued competence of licensees through development of Board designated standards, approving the entity to administer the CCAP and auditing the CCAP entity to assure compliance with their stipulated standards.

Although TPTA is currently designated as the CCAP entity to approve continuing competence activities, the Board maintains the ability to/has considered other entities for this activity

To ensure quality review of continuing competency activities and to ensure compliance with Board standards for the program, TPTA maintains highly qualified physical therapy practitioner reviewers in 22 specialty areas to review proposed

activities. The review activity is a blinded process to avoid preferences and advantages to specific providers.

Although this program may not be the standard with other Texas agencies, this model is utilized by other states for approval of physical therapy continuing education activities.

The current program has decreased complaints and significantly increased the quality of continuing education activities being approved ultimately increasing public safety. Returning this responsibility to the agency would require a significant increase in both staff and fiscal resources to administer such a quality program, resources not currently available.

I am available to speak with staff if desired.

Respectfully,

Tim Lyons, PT

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***Tim Lyons, PT***

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