

From: [Sunset Advisory Commission](#)
To: [Cecelia Hartley](#)
Subject: FW: TBPTE Sunset Review Comments
Date: Monday, November 28, 2016 11:40:40 AM

From: Lois Stickley
Sent: Monday, November 28, 2016 11:36 AM
To: Sunset Advisory Commission
Subject: TBPTE Sunset Review Comments

I am submitting these comments as an individual physical therapist and concerned citizen of Texas. I have been licensed as a physical therapist in Texas since 1982 and in that time have never had a concern or problem in dealing with the Texas Board of Physical Therapy Examiners (TBPTE). In fact, I have found them to be extremely efficient both in licensing and investigating complaints. I am writing to strongly oppose the consolidation of the TBPTE into the TDLR and to urge that the TBPTE be retained as an independent state agency for the next 12 years. This is in alignment with recommendations previously made by Sunset staff on numerous occasions. The TBPTE is a fiscally-sound and efficient agency that deals effectively with the administrative oversight of a doctorally-prepared profession. After reading the Sunset Staff Report, it appears that the TBPTE and TBOTE combined have 20 staff members, which is just 5 less than the definition of a larger agency which would not be considered for consolidation. It seems that being efficient with staffing is being considered a negative in this report.

Consolidation into the TDLR will cost more, deliver less, and reduce the standard of patient safety in Texas. Regarding costs savings, the table on p 15 shows that the projected costs for FY 2020 for an independent TBPTOTE would be \$252,086 LESS than consolidating this board into the TDLR. For FY 2021-2022, there is a projected cost savings, but that is purely conjectural and assumes a \$500,000 cost savings in a single year, which is unrealistic. Regarding complaint history, the Sunset Staff Report lists long complaint investigation and resolution timeliness as a concern. In this same report it is stated that TDLR resolves complaints in 217 days as opposed to the TBPTE's resolution of 127 days (Appendix A). Finally on page 1 of the report, it is stated "Texas is far behind most states that have consolidated their health occupational licensing in various forms." The American Physical Therapy Association has found no other state that has consolidated a PT board into a mix of other healthcare occupations. So not only would Texas be one of the only states not to have an independent board, but it is also one of the few states that does not provide patients with direct access to physical therapists. These two conditions combined will make Texas less appealing to physical therapists and may create a shortage of qualified physical therapists in the state.

In summary, the TBPTE has an outstanding record of protecting public safety and administering the regulation of the physical therapy profession in Texas. It is efficient both financially and in providing services. I urge you to retain the TBPTE as an independent agency. Thank you for your time and consideration. Lois Stickley, PT, PhD