

**From:** [Sunset Advisory Commission](#)  
**To:** [Janet Wood](#)  
**Subject:** FW: Public Input Form for Agencies Under Review (Public/After Publication)  
**Date:** Friday, June 24, 2016 1:58:20 PM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]  
Sent: Friday, June 24, 2016 10:23 AM  
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: Dana

Last Name: Tew PT, DPT

Title: Physical Therapist

Organization you are affiliated with: Harris Health System, OPTIM Manual Therapy

Email: dana.tew@harrishealth.org

City: Houston

State: Texas

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

Issue #1: I support the recommendation to discontinue registration of facilities. It was hoped that registration would deter non-physical therapists and non-occupational therapists from calling what they do physical or occupational therapy, but as the report notes, this regulation has not had the intended effect and is in fact burdensome on physical therapist practice

Issue #4: I strongly support the recommendation to maintain the Texas Board of Physical Therapy Examiners under the administration of the Executive Council of Physical and Occupational Therapy Examiners.

Issue #2: I support the recommendation to adopt the physical therapy licensure compact and to provide for licensure by endorsement. We live in a mobile world and the effort to re-license in another state is unreasonably burdensome on the licensee and does little to protect the public, and has impeded patient access.

Issue #3: I DO NOT support the recommendation to remove the board's authority to delegate to other entities the responsibility of approving continuing education and continuing competence. Since PTs and PT As are required by law to earn continuing competence units each biennium, there must be a process in place to judge the quality of the activities that qualify.

Without this important quality assurance step, continuing competence becomes a money-making scheme for the providers of continuing education courses and the quality suffers. When I take a low quality course, I waste my time and money and it does nothing to assure that I provide safe and effective services for the public. I think what the SAC should ensure is that the licensing board uses an open, transparent and fair bidding process to outsource this task. The licensing board clearly and historically does not have the resources to do it, so the best option is to subcontract it out. I think there could be multiple entities that provide this service -as long as each entity that does it meets a minimal set of qualifications as the TPTA currently does. There are numerous states around the country that outsource their continuing competence program to either the state physical therapy organization in that state or to

the Federation of State Boards of Physical Therapy, or to both. It's a process and relationship that works

Any Alternative or New Recommendations on This Agency: I believe that the physical therapy licensing act should be revised to allow physical therapists to evaluate and treat patients without a physician referral. The citizens of Texas are burdened by the requirement to see a physician prior to a physical therapist and the state and federal governments and private insurers saddled with increased costs that they should not have to incur. There is zero evidence that physical therapists harm the public when they are given the statutory ability to treat patients without a referral. Moreover, health care costs have been shown to increase when patients are required to see a physician first (Physical Therapy, 1997;77:10-18; Health Services Research, 2012;2:633-654). I believe that the shortage of physical therapists in the state will worsen if the law does not change soon, as physical therapists will chose to work elsewhere because of this nonsensical and out of date restriction.

My Comment Will Be Made Public: I agree