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**Philadelphia Consortium
of Academic Coordinators
of Clinical Education**

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October 11, 2011

Regulatory Unit Counsel
State Board of Physical Therapy
P.O. Box 2649
Harrisburg, PA 17105-2649

Reference Number – 16A-6514 (Act 38 of 2008)

Dear Board Members:

In reviewing the proposed rules by the State Board of Physical Therapy, the Philadelphia Consortium of Academic Coordinators of Clinical Education (PCACCE) would like to ask the Board to consider additional language pertaining to the proposed section 40.68(c). In March of 2010, we wrote to request consideration of clinical instruction for continuing education units (CEUs). Our support of this effort continues.

Increasingly clinical instructors (CIs) are being awarded CEUs from state licensing authorities for teaching students in the clinical setting. The PCACCE wishes to advocate for the clinical instructors in Pennsylvania to be afforded the same recognition. Listed below is information to support our request as you consider comments on the new regulations for CEU requirements in Pennsylvania.

As you may know, there are 16 physical therapy programs and 13 physical therapist assistant programs in Pennsylvania. According to the Commission on Physical Therapy Education (CAPTE), the mean for physical therapy programs is 35.9 weeks of full-time clinical education. This accounts for an average of 20.1% of the total education time of physical therapy students (CAPTE, 2010-2011 Fact Sheet Physical Therapist Education Programs). The average for physical therapist assistant programs is 14.9 weeks of full-time clinical education (CAPTE, 2010-2011 Fact Sheet Physical Therapist Assistant Education Programs). CAPTE recognizes that CIs are a critical component of educational programs and requires Physical Therapist and Physical Therapist Assistant educational programs to provide evidence of the qualifications of CIs to support their role in providing education for students. Historically our profession has relied on the volunteer model of clinical education to sustain itself. Even though many CIs are still quite willing to accommodate students, as time demands on clinicians increase, clinicians are looking for ways to meet more than one goal at a time. Awarding CEUs to these CIs would validate the important role they play.

When comparing the CEU requirements in Pennsylvania to those in other states, there are at least 39 other states that require CEUs for licensure renewal. Of those 39, at least 19 offer CEUs for being a CI. The neighboring states of Delaware, New York, and Ohio all offer CEUs for clinical instructors. There are a variety of guidelines governing the



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process. Most CEUs awarded are calculated based on the number of hours or weeks of clinical instruction. Some states limit the number of credits that may be awarded per clinical instructor. A few states require the CI to be credentialed through the American Physical Therapy Association's Clinical Instructor Education and Credentialing Program thus further elevating the qualifications of the CI. Usually the academic program issues a certificate to serve as documentation of instruction and the members of PCACCE would be willing to perform this task.

We trust that you acknowledge the need for highly qualified CIs to appropriately train future clinicians who will provide physical therapy services to the residents of Pennsylvania. Clinical instructors must continue their professional advancement to work with a student in the clinic, and we appreciate the variety of continuing competence activities that would qualify for CEUs under the new proposal. Clinical instructors also gain professional advancement as a result of mentoring students in the clinic. Specifically, CIs must prepare educational opportunities for students; examine and interpret the literature for the most current evidence in practice; discuss theory/rationale for examination and intervention; and they must also develop skills in communication, mentoring and feedback. Awarding CEUs to recognize this advancement is valuable to the CI and thus the profession as a whole.

We ask that the board consider adding language that would award CEUs to recognize the contribution and the professional development that is associated with being a CI.

~~Please let us know if there is anything else we as a Consortium can do to advance this cause.~~ We look forward to hearing your response.

Sincerely,

Brigette Cuffia PT, JD
Chair, PCACCE
Physical Therapy Program
Neumann University
1 Neumann Drive
Aston, PA 19014
cuffiab@neumann.edu

Susan Tomlinson, PT, DPT
Secretary, PCACCE
Physical Therapy Department
Arcadia University
450 S. Easton Road
Glenside, PA 19038
tomlinsons@arcadia.edu

Margaret Rinehart-Ayres, PT, PhD
Vice-Chair, PCACCE
Thomas Jefferson University
Physical Therapy Department
130 S. 9th Street, Suite 830
Philadelphia, PA 19107
Margaret.Ayres@jefferson.edu

Sandra Campbell, PT, MBA
Treasurer, PCACCE
Widener University
One University Place
Institute for Physical Therapy Education
Chester, PA 19013
slcampbell@widener.edu