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

To All Interested Individuals,

As a representative of our 570 physical therapists and physical therapy assistants, the 6,800 commonwealth residents that receive their care and me, I am submitting the following comments to the Pa Act 38.

I commend the Board's development of the proposed regulations to Act 38 and complement the obvious focus on clinical competence. However, as it relates to the increasing demand for access to care, one area of the proposed regulations continues to pose an obstacle. Section 40.171 (c) Scope of Activities, requires a PT or PTA student to be added to the new 1:3 PT to PTA ratio. When looking at the raw numbers of licensed clinicians in the state, one may assume this not to be concern; nevertheless, some clinics will be able to accommodate that ratio. And, in these instances, a student would not be an option.

At a time when our population is aging, the economy is weak and the Affordable Care Act aims to assure coverage of everyone, the demand for skilled physical therapy services continues to rise. As our national organization investigates alternate care models and less expensive delivery options, PT's & PTA's risk erosion of the integrity of their profession. Given this, it certainly would be quite concerning for the commonwealth to concurrently implement a regulation that would potentially interfere with the supply of newly licensed clinicians.

I recommend that the board amends Section 40.171 (c) Scope of Activities in the final regulation by removing the inclusion of a student in the 1:3 PT to PTA ratio. By doing so, the regulations would facilitate the supply of licensed PT's and PTA's to the commonwealth and assure their ongoing clinical competence. And, from the perspective of the employees and patients that I represent that is exactly what the commonwealth needs.

Respectfully Submitted,

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