

2910
State Board of Physical Therapy
P.O. Box 2649
Harrisburg, PA 17105-2649

RECEIVED
IRRC

OCT 19 P 2 18

October 13, 2011

Dear Board Members,

As a licensed physical therapist and occupational therapist in the state of Pennsylvania I commend the Board on the work that they did in developing regulations that support Act 38 of 2008 Amendments.

The provisions of Act 38 of 2008 Amendments provides for an increase in the PT: PTA ratio and indirect supervision of the PTA which allows consumers in the state of Pennsylvania to have improved access to physical therapy care and supports an updated mode of delivery of physical therapy services that would more effectively meet the needs of the consumer within the new healthcare system. In addition, with the inclusion of continuing education and competency requirements it will insure the competence of the clinicians that are providing these services.

There are a few areas that I would like to comment on within these regulations and make recommendations for further review and consideration.

1. Continuing Education/Continuing Competence - Section 40.68 (c)

I commend the Board for the addition of continuing education requirements for therapists and assistants. These regulations allow the clinician to not only utilize educational courses to meet the continuing education requirement but also added continuing competence activities. Though the list of continuing competence activities appear very comprehensive, I would recommend that the Board consider including being a clinical instructor for students as an activity that qualify under this requirement. The Board has included the training to become a Credentialed Clinical Instructor (Section 40.68 (c) 6) but not the actual activity of having a student and providing the clinical experience. With the many changes in health care regulations, institutions have had increased difficulty in finding placements to meet the needs of student clinical experiences. This is a critical aspect in the development of qualified clinicians and the addition of continuing competency credit for those who accept students would be an additional incentive to the practicing clinicians who participate in these experiences.

2. Continuing Education Course Providers/Approval Process - Section 40.67 (d)

In this area I would also make the recommendation that courses that have active approvals from other state physical therapy licensing boards be considered as an approved course for CEU. This would streamline the process and allow ease of access to continuing education opportunities for the clinician.

3. PT – PTA Ratio – Section 40.171 (c)

Act 38 of 2008 Amendments provided for an increase in the ratio of therapist to assistant from a 1:2 ratio to a 1:3 ratio. This again was intended to assist in increasing the access to care for the consumer and also allowing adaptation to the ever changing healthcare environment. In reviewing the regulations I noted that PT and PTA students were added to the PT-PTA ratio of supervision. Though I am aware that the number of licensed assistant in the state is not at the level that would allow the 1:3 ratio in all settings, for those sites that can accommodate this it can be a limiting factor. The ability of the site to have a 1:3 ratio would also limit their ability to take students and as mentioned above in a time where student clinical placements have become more challenging this would add an additional barrier.

With the regulations that are put forth by most payer sources, students share the patient caseload of their supervisor. Having a student, therefore, does not substantially increase the number of patients that the physical therapist would be clinically responsible for. I would recommend that the PT: PTA ratio remains at 1:3 without inclusion of the PTA student as was the initial intent of Act 38 of 2008 Amendments.

Thank you for allowing me to comment on the State Board of Physical Therapy proposed regulations to implement the provisions of Act 38 of 2008 Amendments. I hope that you would consider these comments as you make your final decisions on these regulations.

Respectfully submitted,

LaVerne Russell, PT, OTR/L

LaVerne Russell, PT, OTR/L

PA PT License #: PT000526E

PA OT License#: OC000834L