



October 17, 2011

Regulatory Unit Counsel,  
Department of State  
P.O. Box 2649  
Harrisburg, PA 17105-2649

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Dear Regulatory Unit Counsel,

In reference to the proposed rulemakings for the State Board of Physical Therapy I would ask that you reconsider the following items:

1. The qualification for the physical therapist assistant includes a stipulation (40.162(a)(1)) that applicants be at least 20 years of age and "an applicant who is at least 18 years of age shall have proved to the Board the capability to accept and handle the responsibilities appurtenant to certification." Why is this increase in age requirement been proposed when it previously had been lowered to 18? In my role as a PTA Program Director, it has never been clear to me why I have to provide justification for a graduate who is a few months shy of age 20, versus the 20 year old who is assumed to have the capability and responsibility to handle the responsibilities of a physical therapist assistant. What does age have to do with the capability to accept and handle responsibilities? Typically this involves only a few applicants, as noted in the proposed rule, and is usually the individual who has graduated high school at age 17. Would the Board consider lowering the age to 19 or 19 & 1/2, which would most likely eliminate the need for the exceptions?
2. The continuing education section for physical therapists and physical therapist assistants details a variety of methods that the physical therapist could satisfy the con ed requirements. One example is the PT licensee who becomes a Credentialed Clinical Instructor or Credentialed Clinical Instructor Trainer would be eligible for contact hours. What is not clear, at least to me, is whether the PTA who is a credentialed Clinical Instructor or Credentialed Clinical Instructor Trainer would also be eligible for contact hours. The language for the physical therapist assistant continuing education states that "the Board proposed similar continuing education provisions for physical therapist assistants in 40.192 and 40.193. Does this include all of the relevant activities identified in the physical therapist section? If yes, then my request is limited to making sure this is clear. If the language doesn't apply to the physical therapist assistant then I would ask that the Board identify appropriate continuing activities that will also apply to the physical therapist assistant, and include the list of activities in the PTA section.

Thanks for your attention to these items,

*Thomas Glumac*  
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