



STATE OF WISCONSIN
Department of Safety and Professional Services
1400 E Washington Ave.
Madison WI 53703

Mail to:
PO Box 8935
Madison WI 53708-8935

Email: dsps@wisconsin.gov
Web: <http://dsps.wi.gov>
Phone: 608-266-2112

Governor Scott Walker Secretary Dave Ross

PHYSICAL THERAPY EXAMINING BOARD
Room 121A, 1400 E. Washington Avenue, Madison
Contact: Tom Ryan (608) 266-2112
December 5, 2013

The following agenda describes the issues that the Board plans to consider at the meeting. At the time of the meeting, items may be removed from the agenda. Please consult the meeting minutes for a description of the actions of the Board.

AGENDA

8:30 A.M.

OPEN SESSION – CALL TO ORDER – ROLL CALL

- A. Welcome New Board Member(s)**
- B. Recognition of Board Member(s)**
- C. Adoption of Agenda (1-4)**
- D. Approval of Minutes – September 26, 2013 (5-10)**
- E. Administrative Updates**
 - 1) Staff Updates
 - a. Introduction of Greg Gasper, Administrator, Division of Policy Development
 - b. Introduction of Greg DiMiceli, Executive Director
 - 2) Possible Agency Merger **(11-12)**
 - 3) 2014 Meeting Dates **(13-14)**
 - 4) Other
- F. Education and Examination Matters**
 - 1) **APPEARANCE – Aaron Knautz, Examinations Specialist –**
 - a. Information about FSBPT Exam Retake Policies **(15-18)**
 - b. Update on Oral Exam Item Review **(19-20)**
 - c. Update on Foreign Trained Education Evaluation Services **(21-22)**
 - 2) Proposed NPTE Eligibility Requirements **(23-26)**
- G. Credentialing Matters**
 - 1) FSBPT Supervised Clinical Practice as a Requirement for Licensure **(27-32)**
 - 2) Provisional Licenses for Applicants Who Failed the National Exam **(33-34)**
- H. Practice Matters**
 - 1) Physical Therapists Ordering X-Rays **(35-36)**

I. Legislation/Administrative Rules Matters

- 1) Executive Order 50 – Review of Position Statements – Update from Shari Berry (37-40)

J. Report from FSBPT Annual Meeting

K. DLSC Matters

L. Informational Items

M. Items Added After Preparation of Agenda:

- 1) Introductions, Announcements and Recognition
- 2) Presentations of Petition(s) for Summary Suspension
- 3) Presentation of Proposed Stipulation(s), Final Decision(s) and Order(s)
- 4) Presentation of Final Decisions
- 5) Disciplinary Matters
- 6) Executive Director Matters
- 7) Education and Examination Matters
- 8) Credentialing Matters
- 9) Class 1 Hearing(s)
- 10) Practice Matters
- 11) Legislation/Administrative Rule Matters
- 12) Liaison Report(s)
- 13) Informational Item(s)
- 14) Speaking Engagement(s), Travel, or Public Relation Request(s)

N. Public Comments

CONVENE TO CLOSED SESSION to deliberate on cases following hearing (Wis. Stat. s. 19.85(1) (a)); consider closing disciplinary investigation with administrative warning(s) (Wis. Stat. s. 19.85(1)(b) and Wis. Stat. s. 440.205)), to consider individual histories or disciplinary data (Wis. Stat. s. 19.85 (1)(f)); and, to confer with legal counsel (Wis. Stat. s. 19.85(1)(g))

O. Presentation and Deliberation on Proposed Stipulations, Final Decisions and Orders by the Division of Legal Services and Compliance (DLSC):

P. Presentation and Deliberation on Proposed Administrative Warning(s)

- 1) 12 PHT 021 (M.A.P., PT) (41-44)

Q. DLSC Matters:

- 1) Case Status Report (45-46)
- 2) Case Closing(s)
 - a. 13 PHT 012 (B.K.C.) (47-50)

R. Credentialing Matters:

S. Deliberation of Items Received After Printing of the Agenda

- 1) Disciplinary Matters
- 2) Education and Examination Matters
- 3) Credentialing Matters
- 4) Class 1 Hearings
- 5) Monitoring Matters
- 6) Professional Assistance Procedure (PAP) Matters

- 7) Petition(s) for Summary Suspensions
- 8) Petition(s) for Extension of Time
- 9) Proposed Stipulations, Final Decisions and Orders
- 10) Administrative Warnings
- 11) Proposed Decisions
- 12) Matters Relating to Costs
- 13) Motions
- 14) Petitions for Rehearing
- 15) Formal Complaints
- 16) Case Closings
- 17) Appearances from Requests Received or Renewed

T. Consulting with Legal Counsel

- 1) Update on Needle EMG Litigation

RECONVENE TO OPEN SESSION IMMEDIATELY FOLLOWING CLOSED SESSION

U. Vote on Items Considered or Deliberated Upon in Closed Session, if Voting is Appropriate

ADJOURNMENT

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**PHYSICAL THERAPY EXAMINING BOARD
SEPTEMBER 26, 2013
MINUTES**

PRESENT: Shari Berry, PT; Lori Dominiczak, PT; Thomas Murphy; Jane Stroede, PTA;
Michele Thorman, PT

STAFF: Tom Ryan, Executive Director; Karen Rude-Evans, Bureau Assistant

CALL TO ORDER

Michele Thorman, Chair, called the meeting to order at 8:30 a.m. A quorum of five (5) members was present.

ADOPTION OF AGENDA

Amendments:

- X-Ray Orders by Physical Therapists (open) – Board Discussion – insert after Item J, page 26

MOTION: Shari Berry moved, seconded by Lori Dominiczak, to adopt the agenda as amended. Motion carried unanimously.

APPROVAL OF MINUTES OF JUNE 27, 2013

MOTION: Jane Stroede moved, seconded by Shari Berry, to approve the minutes of June 27, 2013 as written. Motion carried unanimously.

**PRESENTATIONS IN THE MATTER OF THE DISCIPLINARY PROCEEDINGS
AGAINST LUKE W. HAYES, PT**

DLSC Attorney Kim Kluck, Respondent's Attorney Timothy Yanacheck and Luke W. Hayes, PT, appeared before the Board. This matter will be deliberated in closed session.

LEGISLATION/ADMINISTRATIVE RULES MATTERS**Adoption of Rulemaking Order CR 13-007 Relating to Unprofessional Conduct and Biennial Renewal Date**

MOTION: Shari Berry moved, seconded by Jane Stroede, to adopt Rulemaking Order CR 13-007 relating to unprofessional conduct and biennial renewal. Motion carried unanimously.

Executive Order 50 – Review of Position Statements

MOTION: Shari Berry moved, seconded by Lori Dominiczak, to remove the position statement entitled “Can a Wisconsin Physical Therapist or Physical Therapist Assistant Do INR (International Normalized Ratio) Monitoring?” from the DSPTS website and to have Shari Berry bring proposed new language back to the next meeting. Motion carried unanimously.

MOTION: Shari Berry moved, seconded by Lori Dominiczak, to remove the position statement entitled “Are Wisconsin Physical Therapists Allowed to Provide Injections as Being Within the Scope of Their License?” from the DSPTS website and to have Shari Berry bring proposed new language back to the next meeting. Motion carried unanimously.

MOTION: Shari Berry moved, seconded by Jane Stroede, to remove the position statement entitled “May a Physical Therapist Assistant Licensed in Wisconsin Perform Joint Mobilization and Muscle Energy Techniques Under the Direct Supervision of a Licensed Physical Therapist?” from the DSPTS website and to have Shari Berry bring proposed new language back to the next meeting. Motion carried unanimously.

MOTION: Shari Berry moved, seconded by Thomas Murphy, to remove the position statement entitled “In the State of Wisconsin Can a Physical Therapist Assistant Supervise a PT Aide?” from the DSPTS website and to have Shari Berry bring proposed new language back to the next meeting. Motion carried unanimously.

MOTION: Shari Berry moved, seconded by Thomas Murphy, to remove the position statement entitled “Is Rehabilitative Ultrasound Imaging (RUSI) Considered Within the Scope of Practice for Physical Therapists Licensed in the State of Wisconsin?” from the DSPS website and to have Shari Berry bring proposed new language back to the next meeting. Motion carried unanimously.

MOTION: Lori Dominiczak moved, seconded by Jane Stroede, to remove the position statement entitled “Who Can Supervise a PT/PTA With a Temporary License?” from the DSPS website and to have Shari Berry bring proposed new language back to the next meeting. Motion carried unanimously.

MOTION: Shari Berry moved, seconded by Jane Stroede, to remove the position statement entitled “Can a PT/PTA With a Temporary License Have More Than One Supervising PT?” from the DSPS website and to have Shari Berry bring proposed new language back to the next meeting. Motion carried unanimously.

CLOSED SESSION

Chair Michele Thorman read the motion to convene to closed session.

MOTION: Michele Thorman moved, seconded Shari Berry, to convene to closed session to deliberate on cases following hearing (Wis. Stat. § 19.85 (1) (a)); consider closing disciplinary investigation with administrative warning (Wis. Stat. § 19.85 (1) (b), and Wis. Stat. § 440.205); consider individual histories or disciplinary data (Wis. Stat. § 19.85 (1) (f)); and to confer with legal counsel (Wis. Stat. § 19.85 (1) (g)). Roll call vote: Shari Berry-yes; Lori Dominiczak-yes; Thomas Murphy-yes; Jane Stroede-yes; and Michele Thorman-yes. Motion carried unanimously.

The Board convened into closed session at 10:02 a.m.

RECONVENE INTO OPEN SESSION

MOTION: Thomas Murphy moved, seconded by Shari Berry, to reconvene into open session at 12:55 p.m. Motion carried unanimously.

VOTING ON ITEMS CONSIDERED OR DELIBERATED IN CLOSED SESSION

REAFFIRM ALL VOTES TAKEN IN CLOSED SESSION

MOTION: Shari Berry moved, seconded by Jane Stroede, to reaffirm all votes made in closed session. Motion carried unanimously.

PROPOSED DECISION AND ORDER AND CONSIDERATION OF OBJECTIONS

MOTION: Shari Berry moved, seconded by Jane Stroede, to adopt the Findings of Fact, Conclusions of Law and the Decision and Order in the matter of disciplinary proceedings, with variance (paragraph 24 stricken from the record), against **Luke W. Hayes, PT (DHA Case # SPS-12-0055, DLSC Case # 10 PHT 019)**. Motion carried unanimously. Lori Dominiczak was excused during deliberation and voting.

PROPOSED STIPULATION(S), FINAL DECISION(S) AND ORDER(S)

MOTION: Lori Dominiczak moved, seconded by Thomas Murphy, to adopt the Findings of Fact, Conclusions of Law, Final Decision and Order in the matter of disciplinary proceedings against **Karen Jaeger, PT (13 PHT 006)**. Motion carried unanimously.

MOTION: Shari Berry moved, seconded by Jane Stroede, to adopt the Findings of Fact, Conclusions of Law, Final Decision and Order in the matter of disciplinary proceedings against **Vincent J. Kabbaz, PT (13 PHT 005)**. Motion carried unanimously.

PROPOSED ADMINISTRATIVE WARNINGS

MOTION: Shari Berry moved, seconded by Lori Dominiczak, to issue the administrative warning in **case 12 PHT 021 (B.R.K., PT)**. Motion carried unanimously.

MOTION: Shari Berry moved, seconded by Thomas Murphy, to issue the administrative warning in **case 12 PHT 021 (M.A.P., PT)**. Motion carried unanimously.

MOTION: Shari Berry moved, seconded by Lori Dominiczak, to issue the administrative warning in **case 13 PHT 007 (B.L.A., PTA)**. Motion carried unanimously.

RATIFICATION OF LICENSES

MOTION: Jane Stroede moved, seconded by Shari Berry, to ratify the examination scores for the candidates today and to delegate to the Department the ratification of all licenses issued. Motion carried unanimously.

DELEGATION OF SIGNATURES

MOTION: Michele Thorman moved, seconded by Jane Stroede, to delegate to Department Staff signature authority for all documents in the matter relating to Luke W. Hayes. Motion carried unanimously.

ADJOURNMENT

MOTION: Thomas Murphy moved, seconded by Lori Dominiczak, to adjourn the meeting at 1:30 p.m. Motion carried unanimously.

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**State of Wisconsin
Department of Safety & Professional Services**

AGENDA REQUEST FORM

1) Name and Title of Person Submitting the Request: Karen Rude-Evans, Bureau Assistant, On Behalf of Executive Director Tom Ryan		2) Date When Request Submitted: 11/13/2013 Items will be considered late if submitted after 4:30 p.m. on the deadline date: <ul style="list-style-type: none"> ▪ 8 business days before the meeting for paperless boards ▪ 14 business days before the meeting for all others 	
3) Name of Board, Committee, Council, Sections: Physical Therapy Examining Board			
4) Meeting Date: December 5, 2013	5) Attachments: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	6) How should the item be titled on the agenda page? Potential Agency Merger	
7) Place Item in: <input checked="" type="checkbox"/> Open Session <input type="checkbox"/> Closed Session <input type="checkbox"/> Both	8) Is an appearance before the Board being scheduled? <input type="checkbox"/> Yes (Fill out Board Appearance Request) <input checked="" type="checkbox"/> No	9) Name of Case Advisor(s), if required:	
10) Describe the issue and action that should be addressed: Review and discuss the potential agency merger.			
11) Authorization			
Signature of person making this request		Date	
Supervisor (if required)		Date	
Executive Director signature (indicates approval to add post agenda deadline item to agenda) Date			
Directions for including supporting documents: 1. This form should be attached to any documents submitted to the agenda. 2. Post Agenda Deadline items must be authorized by a Supervisor and the Policy Development Executive Director. 3. If necessary, Provide original documents needing Board Chairperson signature to the Bureau Assistant prior to the start of a meeting.			

We are contacting you today as we would appreciate your feedback (including feedback from your organizations board and members) about possibly merging the Department of Safety and Professional Services (DSPS) and the Department of Agriculture, Trade and Consumer Protection (DATCP). Your input about how this consolidation may impact you is very valuable to us.

The 2013-15 state budget calls for a study about consolidating these two agencies. DSPS manages the licensing and regulation of professions in health, business and construction trades. They also oversee state building safety codes and provide services related to plan review, permit issuance, building and component inspection, and safety codes. DATCP is responsible for the promotion and regulation of Wisconsin's agriculture industry, including Agriculture Resource Management and Animal Health, as well as the oversight of food safety and consumer protection.

We ask that you complete the survey and forward this email to your members for their response so we can better understand how a potential consolidation may affect you. Your answers and contact information will be kept confidential and will not be used outside of the scope of this survey. All survey results will be tallied for any reporting purposes.

[TAKE THE SURVEY – your answers will be kept confidential](#)

Thank you in advance for your participation and input.
Office of Business Development

Note: throughout the survey, you will see the term 'license' which refers to any license, credential, certification, registration or permit. Please view the term to mean the document a state agency issues as a requirement to do business, perform an occupation or specific work activity in the State of Wisconsin.

**State of Wisconsin
Department of Safety & Professional Services**

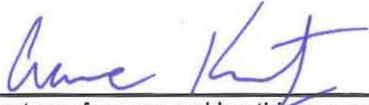
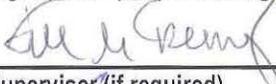
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4) Meeting Date: December 5, 2013	5) Attachments: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	6) How should the item be titled on the agenda page? 2014 Meeting Dates	
7) Place Item in: <input checked="" type="checkbox"/> Open Session <input type="checkbox"/> Closed Session <input type="checkbox"/> Both	8) Is an appearance before the Board being scheduled? <input type="checkbox"/> Yes (Fill out Board Appearance Request) <input checked="" type="checkbox"/> No	9) Name of Case Advisor(s), if required:	
10) Describe the issue and action that should be addressed: Review of 2014 meeting dates. February 27 May 29 September 11 December 11			
11) Authorization			
Signature of person making this request		Date	
Supervisor (if required)		Date	
Executive Director signature (indicates approval to add post agenda deadline item to agenda)			
Date			
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3) Name of Board, Committee, Council, Sections: Physical Therapists Board			
4) Meeting Date: 12/5/13	5) Attachments: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	6) How should the item be titled on the agenda page? Information about FSBPT exam retake policies	
7) Place Item in: <input checked="" type="checkbox"/> Open Session <input type="checkbox"/> Closed Session <input type="checkbox"/> Both	8) Is an appearance before the Board being scheduled? <input checked="" type="checkbox"/> Yes (Fill out Board Appearance Request) <input type="checkbox"/> No	9) Name of Case Advisor(s), if required:	
10) Describe the issue and action that should be addressed: Review communication from the FSBPT and discuss possible feedback to the FSBPT.			
11) Authorization			
 Signature of person making this request		11/25/13 Date	
 Supervisor (if required)		11/25/13 Date	
 Executive Director signature (indicates approval to add post agenda deadline item to agenda)		11/25/12 Date	
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BOARD APPEARANCE REQUEST FORM

Appearance Information

Board Name: Physical Therapists Board

Board Meeting Date: 12/5/13

Person Submitting Agenda Request: Aaron Knautz

Person(s) requesting an appearance: Aaron Knautz

(NOTE: Contact information is not required for Department staff.)

Reason for Appearance: Discuss the 3 exam/education topics listed on the agenda

AppearanceContact Information

(NOTE: If the appearing party is represented by an attorney skip the "AppearanceContact Information" section and complete the "Attorney Contact Information" section.)

Mailing address:

Email address:

Telephone #:

Attorney Contact Information

Attorney Name:

Attorney's mailing address:

Attorney's e-mail address:

Attorney's telephone #:

DRAFT

Eligibility Motions Passed - What You Need to Know

After receiving input from the 2013 Delegate Assembly, the FSBPT Board of Directors is moving forward with implementing new eligibility requirements to access the NPTE.

New Eligibility Requirements:

Lifetime limit – Candidates will be able to take the exam a maximum of 6 times. An individual can take the NPTE for PTs 6 times and also take the NPTE for PTAs 6 times if he or she is otherwise qualified to do so. Candidates will still be allowed up to 3 attempts per year but now will have a 6 time total limit.

Low score limit – Candidates who receive two very low scores on the exam, currently defined as performing at or close to chance level (scale scores 400 and below), will not be allowed to test again. Candidates receiving one very low score on the exam will be notified that their performance is so far away from the minimal competence level that they will need to engage in serious remediation, like enrolling in another PT educational program, before attempting the NPTE again and that another score that is very low (400 or below) will result in a lifetime ban.

English Language Proficiency – Most foreign-educated physical therapists/assistants will need to pass the TOEFL and meet FSBPT's current score requirements. TOEFL scores will be reported directly to FSBPT for purposes of determining eligibility for the NPTE. Candidates will be notified that states may have different requirements for licensure and submitting their scores to the FSBPT does not mean that they have met licensure requirements.

Substantial Educational Equivalence – Graduates from non-CAPTE accredited institutions will need to demonstrate their education is equivalent to a CAPTE accredited education by having an authorized agency complete an evaluation using the FSBPT's Coursework Tool (CWT).

Timing:

The new eligibility requirements as described above will go into effect as of January 1, 2015. This means any candidate taking an exam in 2015 must meet the new eligibility requirements regardless of when they register for the exam. FSBPT will not be "grandfathering" any candidates. Rather, we are providing significant advance notice so that candidates can consider the new requirements, remediate if necessary to improve performance, and take advantage of a maximum of 3 additional attempts (per exam level) during the 2014 calendar year.

Implementation:

FSBPT will be responsible for ensuring that candidates have met all the eligibility requirements prior to presenting a candidate to a state for approval. This means FSBPT will receive information directly from

ETS regarding TOEFL scores and directly from authorized agencies that perform CWT evaluations. A candidate will only show up in the online processing system (OPS) jurisdiction approval queue when the candidate has met all FSBPT eligibility requirements. The jurisdiction will then be responsible for going through its standard approval process. Once FSBPT eligibility requirements have been met and the state has approved the individual as a bona fide candidate for licensure, the candidate will receive an Authorization to Test (ATT) letter.

Communication:

From FSBPT - FSBPT has been in communication with its members and other stakeholders on eligibility topics since the 2011 NPTE Summit. The candidate population, however, has not had the same exposure to this issue. FSBPT is doing several things to communicate with candidates. First, all candidates who have tested prior to January 2014 will receive a customized letter from FSBPT explaining the new requirements and how they will affect the individual. FSBPT is also updating the candidate handbook to explain the changes. Lastly, we have created a web page on fsbpt.org to explain the changes in detail so that candidates and jurisdictions have a single, accurate source of information - www.fsbpt.org/eligibility.

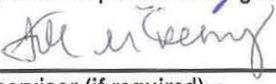
From Jurisdictions – The changes that will go into effect are directly related to exam eligibility, not requirements for licensure. While there is likely some overlap in what FSBPT requires and what a state requires, it's important to be clear that these are changes that FSBPT is implementing in order for an individual to gain access to the exam and not a requirement that the jurisdiction is implementing for licensure. As such, jurisdictions need to understand the new requirements, timeline, and implementation issues but do not need to communicate with the candidates directly since FSBPT has a comprehensive communication plan. If you would like to inform candidates of the changes in FSBPT's policies related to exam eligibility we'd ask that you point people to www.fsbpt.org/eligibility.

Questions?

If you have questions about the upcoming changes, please contact Susan Layton at slayton@fsbpt.org.

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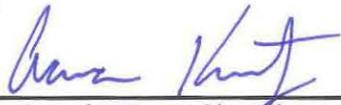
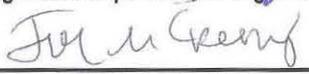
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4) Meeting Date: 12/5/13	5) Attachments: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	6) How should the item be titled on the agenda page? Update about oral exam item review	
7) Place Item in: <input checked="" type="checkbox"/> Open Session <input type="checkbox"/> Closed Session <input type="checkbox"/> Both	8) Is an appearance before the Board being scheduled? <input checked="" type="checkbox"/> Yes (<u>Fill out Board Appearance Request</u>) <input type="checkbox"/> No	9) Name of Case Advisor(s), if required:	
10) Describe the issue and action that should be addressed: Information update.			
11) Authorization			
 Signature of person making this request		11/25/13 Date	
 Supervisor (if required)		11/25/13 Date	
Executive Director signature (indicates approval to add post agenda deadline item to agenda) Date			
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4) Meeting Date: 12/5/13	5) Attachments: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	6) How should the item be titled on the agenda page? Update about foreign trained education evaluation services	
7) Place Item in: <input checked="" type="checkbox"/> Open Session <input type="checkbox"/> Closed Session <input type="checkbox"/> Both	8) Is an appearance before the Board being scheduled? <input checked="" type="checkbox"/> Yes (Fill out Board Appearance Request) <input type="checkbox"/> No	9) Name of Case Advisor(s), if required:	
10) Describe the issue and action that should be addressed: Information update.			
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3) Name of Board, Committee, Council, Sections: Physical Therapy Examining Board			
4) Meeting Date: December 5, 2013	5) Attachments: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	6) How should the item be titled on the agenda page? Proposed NPTE Eligibility Requirements	
7) Place Item in: <input checked="" type="checkbox"/> Open Session <input type="checkbox"/> Closed Session <input type="checkbox"/> Both	8) Is an appearance before the Board being scheduled? <input type="checkbox"/> Yes (Fill out Board Appearance Request) <input checked="" type="checkbox"/> No	9) Name of Case Advisor(s), if required:	
10) Describe the issue and action that should be addressed: Review and discuss the proposed NPTE eligibility requirements.			
11) Authorization			
Signature of person making this request		Date	
Supervisor (if required)		Date	
Executive Director signature (indicates approval to add post agenda deadline item to agenda) Date			
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NPTE Eligibility Requirements – What is the status of proposed changes?

November 22, 2013

After receiving input on proposed changes to NPTE eligibility requirements from the 2013 Delegate Assembly, the Leadership Issues Forum and the NPTE Summit, the FSBPT Board of Directors has instructed staff to solicit additional information from member boards. The focus will be to understand any concerns on each of the requirements and discuss specific implementation strategies.

Proposed Eligibility Requirements:

Lifetime limit – Candidates will be able to take the exam a maximum of 6 times. An individual can take the NPTE for PTs 6 times and also take the NPTE for PTAs 6 times if he or she is otherwise qualified to do so. Candidates will still be allowed up to 3 attempts per year but now will have a 6 time total limit.

Low score limit – Candidates who receive two very low scores on the exam, currently defined as performing at or close to chance level (scale scores 400 and below), will not be allowed to test again. Candidates receiving one very low score on the exam will be notified that their performance is so far away from the minimal competence level that they will need to engage in serious remediation, like enrolling in another PT educational program, before attempting the NPTE again and that another score that is very low (400 or below) will result in a lifetime ban.

English Language Proficiency – Most foreign-educated physical therapists/assistants will need to pass the TOEFL and meet FSBPT's current score requirements. There will be some exemptions based on country of education. TOEFL scores will be reported directly to FSBPT for purposes of determining eligibility for the NPTE. Candidates will be notified that states may have different requirements for licensure and submitting their scores to the FSBPT does not mean that they have met licensure requirements.

Substantial Equivalence – Graduates from non-CAPTE accredited institutions will need to demonstrate their education is equivalent to a CAPTE accredited education by having an authorized agency complete an evaluation using the FSBPT's Coursework Tool (CWT). A list of authorized agencies is available on <https://www.fsbpt.org/FreeResources/CredentialingOrganizationsforNonUSCandidates.aspx>.

Proposed Implementation:

FSBPT will be responsible for ensuring that candidates have met all the eligibility requirements prior to presenting a candidate to a state for approval. This means FSBPT will receive information directly from ETS regarding TOEFL scores and directly from authorized agencies that perform CWT evaluations. A candidate will only show up in the online processing system (OPS) jurisdiction approval queue when the candidate has met all FSBPT

eligibility requirements. The jurisdiction will then be responsible for going through its standard approval process. Once FSBPT eligibility requirements have been met and the state has approved the individual as a bona fide candidate for licensure, the candidate will receive an Authorization to Test (ATT) letter.

Timing:

A date for implementation has not been set. The FSBPT Board of Directors will be taking into consideration the challenges for member boards when determining the timeline. We feel it is important to give candidates an appropriate notice period, not less than a year, before the new requirements go into effect. This would allow candidates time to meet the new requirements and take advantage of a maximum of 3 additional exam attempts from the time notice is given.

Next Steps:

FSBPT needs to hear from all of our members as we move forward with these new requirements. The board administrator for your state will be receiving a link to a survey to collect information on how the eligibility requirements can be implemented in your state. When additional information is required, an FSBPT staff person will follow-up with a phone call. If you prefer to provide your comments directly to a staff member instead of completing the survey, please contact Susan Layton at slayton@fsbpt.org or 703-299-3100 x224.

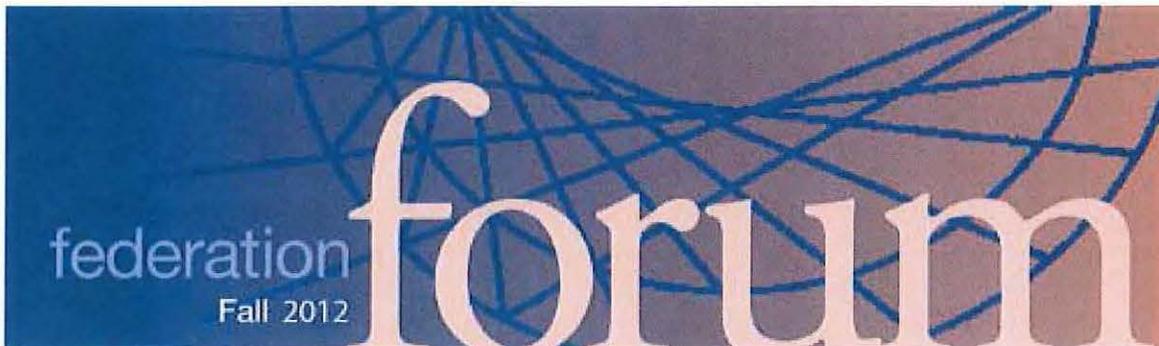
Distribution: Jurisdiction board members and administrators; board of directors

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**State of Wisconsin
Department of Safety & Professional Services**

AGENDA REQUEST FORM

1) Name and Title of Person Submitting the Request: Karen Rude-Evans, Bureau Assistant, On Behalf of Executive Director Tom Ryan		2) Date When Request Submitted: 11/13/2013 Items will be considered late if submitted after 4:30 p.m. on the deadline date: <ul style="list-style-type: none"> ▪ 8 business days before the meeting for paperless boards ▪ 14 business days before the meeting for all others 	
3) Name of Board, Committee, Council, Sections: Physical Therapy Examining Board			
4) Meeting Date: December 5, 2013	5) Attachments: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	6) How should the item be titled on the agenda page? FSBPT Supervised Clinical Practice as a Requirement for Licensure	
7) Place Item in: <input checked="" type="checkbox"/> Open Session <input type="checkbox"/> Closed Session <input type="checkbox"/> Both	8) Is an appearance before the Board being scheduled? <input type="checkbox"/> Yes (Fill out Board Appearance Request) <input checked="" type="checkbox"/> No	9) Name of Case Advisor(s), if required:	
10) Describe the issue and action that should be addressed: Review and discuss the FSBPT supervised clinical practice as a requirement for licesure.			
11) Authorization			
Signature of person making this request		Date	
Supervisor (if required)		Date	
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Coming to America: Supervised clinical practice as a requirement for licensure

Joni Kalis, PT and Mary Keehn, PT, FSBPT Foreign Educated Standards Committee

Note: The following article was developed from an educational session at the 2012 FSBPT annual meeting.

In January 2010, the Foreign Educated Standards Committee (FES) began creating tools for supervised clinical practice (SCP). The committee believes SCP is a very important component of ensuring competence of foreign-educated physical therapists (FEPT).

Our rationale is that most foreign programs are not accredited. Accreditation programs look at an overall curriculum plan, faculty and expected outcomes and sets quality standards for programs. India, for instance, has more than 200 approved programs, but they are not the same as an accreditation process. There is no way to determine if the program is excellent or weak.

We have a lack of knowledge of the breadth, depth and content of the foreign-educated PT's clinical experience. The Coursework Tool (CWT-5) requires that the foreign-educated must complete 800 clinical hours in their country, but we don't know the quality of the supervisor, types of patients they are seeing, the level of autonomy and we don't even know how they are evaluated.

There are also limitations to the credentialing process, as much of the information we use to determine qualifications rely on transcripts from their schools.

Professional expectations and responsibilities in the United States may be different from the applicant's country of education. Not every country has the equivalent of an assistant. There are complexities of documentation and differences in supervisory expectations. There are variations in the level of English proficiency – we still have nine jurisdictions that do not require applicants to demonstrate English language proficiency. The rationale is that if they can pass an exam, it is good enough. But that does not address speaking skills.

Overall, there is a lack of exposure to the U.S. healthcare system, which is rather complicated and seems to change on a daily basis. It involves federal and state regulations, insurance, co-pays and authorization for visits, among other items.

The numbers

In 2011, first-time NPTE test-takers included 901 people from the Philippines, 831 from India, 29 from the UK and Ireland, 28 from other European Union countries, 13 from Canada, 6 from Australia/ New Zealand and 193 from other countries. First-time pass rates for six fixed-date exams for the past two years averaged between 20% and 29% for foreign-educated students.

Here are some other revealing statistics:

- 97% of U.S. educated take the NPTE within one year of graduation
- 98% of non-U.S. educated take the NPTE more than two years after graduation
- 58% of non-U.S. educated take the NPTE more than five years after graduation

What are these candidates doing professionally during this time period? Jurisdictions may get that information by asking for the candidate's work history. But jurisdictions may not feel comfortable licensing a person if they haven't worked in years. Supervised Clinical Practice could provide the bridge.

We believe SCP benefits both the FEPT and the jurisdiction. Completion of the SCP will better prepare a FEPT for successful entry into the U.S. workforce. The goal is to ensure that licensed foreign-educated PTs perform at the same level at U.S. graduates.

The SCP promotes clinical competence and the delivery of safe and effective care. It also promotes cultural competence, allowing candidates to adjust to US verbal and non-verbal communication and navigate interpersonal relationships.

The SCP also protects the public by assuring that the FEPT can successfully practice within the U.S. healthcare system.

State by state

Fourteen states requires SCP – Alaska, Arizona, California, Georgia, Kentucky, Louisiana, Minnesota, North Dakota, Oklahoma, Pennsylvania, South Carolina, Tennessee, Virginia and Wyoming. However, under certain circumstances, those requirements may be waived in some states.

The SCP Model

We are proposing a statutory authority with these prerequisites.

- A substantially equivalent education
- Demonstration of English proficiency
- Passing the NPTE
- Obtaining a provisional or restricted license for the purpose of completing the SCP

The duration would be 1,000 hours; essentially six months of full-time clinical practice. We also expect the facility to provide a broad range of experience with adequate staffing, an adequate number and variety of patients and a variety of diagnoses. The board would review each of these items with the applicant.

The supervisor would be a currently practicing physical therapist clinician with 3+ years of experience. We recommend continuous onsite supervision and continued involvement in all aspects of patient care. The supervisor would also have to be immediately available to the applicant.

We would expect full disclosure from the supervisor, including their intent to hire the applicant, their relationship to the applicant and whether there is a salary or stipend involved.

We would expect a midterm and final report as well as informal feedback provided throughout the experience.

The SCP Performance Evaluation Tool being developed would:

- Be written specifically for the FEPT completing a SCP
- Be a single tool intended to be used in any clinical setting
- Have a rating scale that will result in a numeric score for the midterm and final
- Have an objective numeric score that gives the clinician and jurisdiction greater ease in determining if the applicant has met a minimum standard
- Be a tool tested for reliability and validity

The pilot tool, which currently has 72 different items, would include items in examination, evaluation and clinical assessment, federal and state regulations, insurance, direct access and autonomous practice, collaboration, billing, coding documentation, language and communication skills (speaking, writing, listening) and professional behaviors such as safe practice and professional demeanor.

What's next

A survey regarding the performance evaluation tool has been sent to a large stakeholder group; the feedback is essential to the development of this tool. We will also identify jurisdictions interested in piloting the tool; Virginia has indicated such an interest.

We believe supervised clinical practice is a feasible way for jurisdictions to bridge potential gaps in knowledge and clinical skills, to provide the needed education on the U.S. healthcare system and assure the competence of FEPTs.

Panel discussion

Questions posed to individual members of the panel:



Chuck Brown, Executive Director, Arizona

Q: Logistically, how difficult is it from an administrator's perspective to manage the supervised clinical practice program? What presents the biggest challenge for you in administering the supervised clinical practice? Do your applicants have a difficult time finding placements and/or appropriate supervisors?

A: We have a pretty low volume in Arizona. Managing that low volume has been fairly easy. Making sure the facilities that are chosen have the right number of supervisors is the biggest challenge. The board has to approve each supervisor. We have no difficulty in finding placements. We have rigorous process for foreign-educated applicants; they have to be dedicated.

Q: Do you see candidates actually fail the SCP, or is licensure simply delayed until all applicants eventually successfully complete the SCP?

A: Initially, they have 90 days or 500 hours to complete the process. The supervisor must submit a mid-term examination, and that is where issues are identified and brought to the board for appropriate action. Delegation seems to be a big issue. Sometimes we have to add another 500 hours to complete the process.



Nina Hurter, Administrator, Texas

Q: Can you please discuss what stage Texas is in regarding implementing mandatory supervised clinical practice? What promoted the interest and discussion initially? Were you aware of FSBPT's model?

A: We are just in the talking stage and not even committed to implementing one of these programs. It is overwhelming. Over the past five years, we have made it less restrictive for foreign-educated PTs to come to our state. We need therapists. As the number goes up, it has become more of a concern. Should we worry more about differences in clinical skills? I was aware of the FSBPT model. We do have a coursework tool, which addresses education. Content areas are rather vague.

Q: What are the most significant concerns of the board and the staff as supervised clinical practice for foreign educated therapists is discussed?

A: We had 89 applicants go through process in the past year, including current applicants and those who failed the test during that timeframe. We don't know that we've seen much documentation that foreign-trained PTs are not up to par. We don't want to make foreign-trained applicants do more than U.S. applicants if it is not justified. We want some assurance that SCP will be useful, and it appears that it will be useful. Our other concern is how to choose the right supervisors and how to find enough of them. In Texas, it will be a hurdle because we have so many applicants.



George Maihafer, Board President, Virginia

Q: In Virginia, has supervised clinical practice been an effective way to evaluate a person's ability to perform in the clinic? What is the greatest benefit you see to requiring the supervised clinical practice?

A: Yes, it has been effective; we've been doing this for 20 years. It is important to get an assessment of navigating the U.S. healthcare system, delegation, documentation and billing and cultural competency. Our numbers are foreign-educated applicants are low, so they are easy to track.

Q: What current tool do you use for performance evaluation?

A: In the 80s, we evaluated various tools, and with our limited funds adopted the New England consortium tool. It was one of the best tools out there. But times have changed. We realize our current tool is designed for entry-level U.S. students, not foreign trained students.

Q: What is prompting your board's search for a new performance evaluation tool? What factors do you feel will most impact your choice of a new tool?

We realize our current tool does not provide what is necessary to improve performance. The tool also did not look at cultural competence, billing, delegation or direct access.



Joni Kalis, PT, Chair of the Foreign Educated Standards Committee

Joni Kalis is a physical therapist and has been involved with the Federation since 2002. She has served as an item writer, a delegate, chaired the 2009 Bylaws Task force, was a member of the Foreign Educated Standards subcommittee that led to the development of Quality Standards for credentialing agencies and received the Federation's outstanding service award in 2009. Joni is the current chair of the Foreign Educated Standards Committee and is the past president of the Arizona Board of Physical Therapy.



Mary T. Keehn PT, DPT, MHPE

Mary T. Keehn, PT, DPT, MHPE received her Physical Therapy degree and a Master's Degree in Health Professions Education from the University of Illinois at Chicago (UIC), and a Doctor of Physical Therapy from the Massachusetts General Hospital Institute of Health Professions. She was a faculty member and Director of Rehabilitation Services at the University of Illinois at Chicago for over 30 years. Dr. Keehn has served on the Illinois Physical Therapy Licensing and Disciplinary Board since 2007 and is now a PhD student at UIC. Other professional activities include serving as a commissioner and on site visitor for CAPTE, and private practice as a practice, education and administration consultant. Mary serves on the Foreign Education Physical Therapy Committee for FSBPT.

**State of Wisconsin
Department of Safety & Professional Services**

AGENDA REQUEST FORM

1) Name and Title of Person Submitting the Request: Karen Rude-Evans, Bureau Assistant, On Behalf of Legal Counsel Gretchen Mrozinski		2) Date When Request Submitted: 11/25/2013 Items will be considered late if submitted after 4:30 p.m. on the deadline date: <ul style="list-style-type: none"> ▪ 8 business days before the meeting for paperless boards ▪ 14 business days before the meeting for all others 	
3) Name of Board, Committee, Council, Sections: Physical Therapy Examining Board			
4) Meeting Date: December 5, 2013	5) Attachments: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	6) How should the item be titled on the agenda page? Provisional Licenses for Applicants Who Failed the National Exam	
7) Place Item in: <input checked="" type="checkbox"/> Open Session <input type="checkbox"/> Closed Session <input type="checkbox"/> Both	8) Is an appearance before the Board being scheduled? <input type="checkbox"/> Yes (Fill out Board Appearance Request) <input checked="" type="checkbox"/> No	9) Name of Case Advisor(s), if required:	
10) Describe the issue and action that should be addressed: Review and discuss the memo regarding provisional licenses for applicants who failed the national exam.			
11) Authorization			
Signature of person making this request		Date	
Supervisor (if required)		Date	
Executive Director signature (indicates approval to add post agenda deadline item to agenda) Date			
Directions for including supporting documents: 1. This form should be attached to any documents submitted to the agenda. 2. Post Agenda Deadline items must be authorized by a Supervisor and the Policy Development Executive Director. 3. If necessary, Provide original documents needing Board Chairperson signature to the Bureau Assistant prior to the start of a meeting.			

MEMORANDUM

Date: November 25, 2013
To: Physical Therapy Examining Board
Cc: Thomas Ryan, Executive Director
From: Gretchen Mrozinski, Legal Counsel
Subject: Provisional licenses for applicants who failed the National exam

At the last Physical Therapy Examining Board (Board) meeting, you asked me to research whether an applicant who has failed the National Physical Therapist exam or National Physical Therapist Assistant exam, would be eligible for a provisional (temporary) license.

Short Answer: Yes, if the applicant meets specific requirements.

Long Answer: Wisconsin Stat. § 448.53(2) provides that the Board may promulgate rules providing for various classes of temporary licenses to practice physical therapy. The Board did just that when they wrote Wis. Admin. Code ch. PT 3. Wisconsin Admin. Code § PT 3.01 provides for a temporary license for a physical therapist (PT) and/or a physical therapist assistant (PTA). In order to receive such a temporary license, the following requirements must be met:

1. The applicant must have filed an application for a regular license.
2. The applicant has not previously been licensed to practice as a PT or a PTA in Wisconsin.
3. The applicant must be a graduate of an approved school of physical therapy or a physical therapist assistant educational program.
4. The applicant has applied to take the National exam.
5. The applicant has not yet received the results of the National exam and is instead, waiting for such results.
6. The applicant is not required to take the oral exam.
7. The applicant must be qualified for admission to take the National exam.

If all of the requirements are met, the Board has discretion to grant or deny a temporary license as the applicable language in Wis. Admin. Code § PT 3.01(1) provides that the applicant “may apply” to the Board for a temporary license and that the Board “may issue” a temporary license. A temporary license begins with a duration of three months and cannot exceed nine months in total (through extensions and renewals). I read and interpret Wis. Admin. Code § PT 3.01 as allowing for a temporary license even if the applicant failed the National exam. The requirements do not specify that they are only applicable to an applicant who has never taken the National exam. I find support for my opinion in Wis. Admin. Code § PT 3.01(5) which allows for an extension of the temporary license after the applicant receives failing examination results. I interpret number five above (in the above list of seven requirements) as pertaining to the current exam application—not the prior failed exam.

In sum, if an applicant fails the National exam but then reapplies to take the National exam again and meets all other requirements as listed above, it is my legal opinion that the Board may issue a temporary license per Wis. Admin. Code ch. PT 3.

**State of Wisconsin
Department of Safety & Professional Services**

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3) Name of Board, Committee, Council, Sections: Physical Therapy Examining Board			
4) Meeting Date: December 5, 2013	5) Attachments: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	6) How should the item be titled on the agenda page? PTs Ordering X-Rays	
7) Place Item in: <input checked="" type="checkbox"/> Open Session <input type="checkbox"/> Closed Session <input type="checkbox"/> Both	8) Is an appearance before the Board being scheduled? <input type="checkbox"/> Yes (Fill out Board Appearance Request) <input checked="" type="checkbox"/> No	9) Name of Case Advisor(s), if required:	
10) Describe the issue and action that should be addressed: Review and discuss whether physical therapists may order x-rays.			
11) Authorization			
Signature of person making this request		Date	
Supervisor (if required)		Date	
Executive Director signature (indicates approval to add post agenda deadline item to agenda)			
Date			
Directions for including supporting documents: 1. This form should be attached to any documents submitted to the agenda. 2. Post Agenda Deadline items must be authorized by a Supervisor and the Policy Development Executive Director. 3. If necessary, Provide original documents needing Board Chairperson signature to the Bureau Assistant prior to the start of a meeting.			

MEMORANDUM

Date: November 25, 2013
To: Physical Therapy Examining Board
Cc: Thomas Ryan, Executive Director
From: Gretchen Mrozinski, Legal Counsel
Subject: Whether Physical Therapists may order x-rays.

When the Physical Therapy Examining Board (Board) last met, Tom Ryan asked me to research the following issue: Whether Wisconsin law allows licensed Physical Therapists (PT) to order x-rays.

Short Answer. While Wis. Stat. § 448.50(4)—read alone—may allow PTs to order x-rays, various other legal provisions do not. More specifically, Wis. Stat. § 462.04, will not allow a radiographer or x-ray machine operator to perform an x-ray unless authorized/prescribed by specific licensed practitioners which do not include a PT.

Long Answer. It appears that sometime in 2005, Board legal counsel advised the Board that PTs have the authority to order x-rays (I am not in possession of such a letter nor have I viewed this letter). It appears that this legal opinion was based upon Wis. Stat. § 448.50(4) which defines the practice of physical therapy and states that physical therapy does not include “using” x-rays. Since this section did not specifically prohibit the ordering of x-rays for diagnostic or treatment purposes, it looks like Board legal counsel found it legally acceptable for PTs to order x-rays as part of the PT’s examination and evaluation of the patient.

I cannot say that I concur with the 2005 legal opinion because I do not believe that Wis. Stat. § 448.50(4) can be read alone or operate in a vacuum. There are additional statutory and code provisions to consider that specifically provide who may order an x-ray. Wisconsin Admin. Code ch. DHS 157 pertains to “Radiation Protection.” Wisconsin Admin. Code § DHS 157.03(191) defines a licensed practitioner to include “a chiropractor, dentist, physician, podiatrist, physician assistant, nurse practitioner or radiologist’s assistant licensed in the state of Wisconsin.” Wisconsin Admin. Code § DHS 157.74(2)(f) only allows licensed practitioners to order an x-ray. Finally, Wis. Stat. § 462.04 confirms the language found in ch. DHS 157 by repeating that only physicians, dentists, podiatrists, chiropractors, advanced practice nurses and physician assistants can order x-rays. More specifically, Wis. Stat. § 462.04 will not allow a radiographer or x-ray machine operator to perform an x-ray when ordered by a physical therapist. If the radiographer or x-ray machine operator performs an x-ray ordered by a PT, that radiographer or x-ray machine operator may be subject to discipline under their statutes and code.

In sum, while Wis. Stat. § 448.50(4), read alone, may not specifically prohibit a PT from ordering an x-ray, other more persuasive statutory and code provisions do. Wisconsin Admin. Code §§ DHS 157.03 and 157.74, clearly advise that only licensed practitioners (which do not include a PT) may authorize an x-ray. In addition, Wis. Stat. § 462.04 does not allow a radiographer or x-ray machine operator from performing an x-ray ordered or authorized by a PT. Accordingly, a law change is necessary in order for PTs to order x-rays.

**State of Wisconsin
Department of Safety & Professional Services**

AGENDA REQUEST FORM

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3) Name of Board, Committee, Council, Sections: Physical Therapy Examining Board			
4) Meeting Date: December 5, 2013	5) Attachments: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	6) How should the item be titled on the agenda page? Review of Proposed Changes to Position Statements	
7) Place Item in: <input checked="" type="checkbox"/> Open Session <input type="checkbox"/> Closed Session <input type="checkbox"/> Both	8) Is an appearance before the Board being scheduled? <input type="checkbox"/> Yes (Fill out Board Appearance Request) <input checked="" type="checkbox"/> No	9) Name of Case Advisor(s), if required:	
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**Positions Statements Related to Physical Therapy
Issued by the Physical Therapy Examining Board**

CAN A PHYSICAL THERAPIST IN WISCONSIN EVALUATE AND TREAT A PATIENT WITHOUT A REFERRAL?

Yes. Wisconsin is considered a Direct Access state. As per Chapter PT 6.01 a written referral is not required for the following physical therapy services related to the work, home, leisure, recreational and educational environments: conditioning, injury prevention and application of biomechanics and treatment of musculoskeletal injuries with the exception of acute fractures or soft tissue avulsions. Per Wis. Stat. s. 448.56 a written referral is also not required if a physical therapist provides services in schools to children with disabilities, as part of a home health care agency, to a patient in a nursing home or to an individual for a previously diagnosed medical condition after informing the individual's health care practitioner who made the diagnosis.

MAY A PHYSICAL THERAPIST NOT LICENSED IN THE STATE OF WISCONSIN PERFORM A HOME EVALUATION?

No. Per Wis. Stat. s. 448.51(1) and 448.51 (2)(b) no person may practice physical therapy unless the person is licensed as a physical therapist under this subchapter and no person may claim to render physical therapy or physiotherapy services unless the person is licensed as a physical therapist under this subchapter.

MAY A PHYSICAL THERAPIST ASSISTANT LICENSED IN WISCONSIN PERFORM JOINT MOBILIZATION AND MUSCLE ENERGY TECHNIQUES UNDER THE DIRECT SUPERVISION OF A LICENSED PHYSICAL THERAPIST?

Per Wis. Stat. s. 448.56(6) a physical therapist is responsible for managing all aspects of the physical therapy care of each patient under his or her care. Chapter PT 5.01 describes the practice and supervision of physical therapist assistants. Physical therapists need to consider all legal standards and professional standards of practice in delegating intervention to the physical therapist assistant.

HOW MANY PHYSICAL THERAPIST ASSISTANTS MAY PRACTICE UNDER THE GENERAL SUPERVISION OF A PHYSICAL THERAPIST IN WISCONSIN?

Per Chapter PT 5.01(2)(j), limit the number of physical therapist assistants practicing under general supervision to a number appropriate to the setting in which physical therapy is administered, to ensure that all patients under the care of the physical therapist receive services that are consistent with accepted standards of care and consistent with all other requirements under this chapter. No physical therapist may at any time supervise more than 2 physical therapist assistants full-time equivalents practicing under general supervision. Additionally, per Chapter PT 5.02(k) the total number of physical therapist assistants providing physical therapy services and unlicensed personnel performing patient related tasks under supervision may not exceed a combined total of 4. This number shall be reduced by the number of physical therapists and physical therapist assistants holding temporary licenses who are being supervised under s. [PT 3.01 \(6\)](#).

CAN A PT /PTA WITH A TEMPORARY LICENSE HAVE MORE THAN ONE SUPERVISING PT?

The PT who signs the temporary license application is considered the primary PT for purposes of supervision. In the event that the primary PT is absent (illness, vacation, etc), another primary PT must be identified to supervise the temporary licensed PT or PTA. The important issue is that at any point in time, a primary supervising PT is formally identified within the practice. The PTEB does not need to be informed of changes in supervising PTs, however it may be prudent to document the change in supervisors. It is the responsibility of the temporary licensed PT /PTA and primary PT to assure that supervisory rules are satisfied.

WHAT ARE THE SUPERVISORY REQUIREMENTS OF A PT /PTA WITH A TEMPORARY LICENSE?

As per Chapter PT 3.01 (3) (4) The holder of a temporary license to practice physical therapy or to practice as a physical therapist assistant under supervision may provide physical therapy services as defined by s. [448.50 \(4\)](#), Stats., providing that the entire practice is under the supervision of a person validly holding a regular license as a physical therapist. The supervision shall be direct, immediate, and on premises.

CAN A PTA WITH A TEMPORARY LICENSE WORK UNDER GENERAL SUPERVISION?

No. As per Chapter PT 3.01 (4) the holder of a temporary license to practice as a physical therapist assistant under supervision may provide physical therapy services as defined by s. [448.50 \(4\)](#), Stats., providing that the entire practice is under the supervision of a person validly holding a regular license as a physical therapist. The supervision shall be direct, immediate, and on premises.

CAN A TEMPORARY LICENSED PT SUPERVISE A LICENSED PTA?

A temporary licensed PT can supervise a licensed PTA on premise as long as a validly licensed PT provides direct, immediate and on site supervision of the temporary licensed PT.

A temporary licensed PT can supervise a licensed PTA off premise as long as a validly licensed PT provides direct, immediate and on site supervision of the temporary licensed PT. In this case, the regularly licensed PT is supervising the licensed PTA under general supervision "one step removed" through the temporary licensed PT. While this is a legally acceptable practice, it is advised that the regularly licensed PT clearly understand their responsibility under these circumstances and be secure in the skills of all personnel who they are supervising.

CAN A PHYSICAL THERAPIST PRACTICING IN A SCHOOL IN THE STATE OF WISCONSIN PROVIDE SERVICES AT A UNIVERSAL LEVEL (I.E. OFFER INTERVENTION STRATEGIES FOR STUDENTS NOT IDENTIFIED AS STUDENTS WITH DISABILITIES OR PROVIDING SERVICES RELATED TO PREVENTION, FITNESS AND WELLNESS)?

Wisconsin 448.50(4)(a)3 supports the meaning of physical therapy in the context of reducing risk of injury, impairment, functional limitation, or disability, including the promotion or maintenance of fitness, health, or quality of life in all age populations. Written referral for physical therapy services for children with disabilities in schools is not required as stated in Wisconsin 448.56(1) The statutes

do not address the need for written referral when providing services to individuals without disabilities that are meant to address fitness, health or quality of life.