



Ohio Occupational Therapy, Physical Therapy,
and Athletic Trainers Board

Physical Therapy Section
March 8, 2012
9:30 a.m.

Members Present

Raymond Bilecky
Lynn Busdeker
Thomas Caldwell, Chair
Sam Coppoletti, Secretary
Mary Kay Eastman
Karen Holtgrefe
Ronald Kleinman
James Lee

Legal Counsel

Yvonne Tertel, Assistant Attorney General

Staff Present

H. Jeffery Barker, Investigator
Diane Moore, Executive Assistant
Jeffrey Rosa, Executive Director

Call to Order

The meeting was called to order by the Chair, Thomas Caldwell, at 9:34 a.m.

The Section welcomed the physical therapy students from Ohio University.

Thomas Caldwell introduced the new Board member Ronald Kleinman, PT from Fairlawn, Ohio.

Approval of Minutes

Action: Karen Holtgrefe moved that the minutes from the January 19, 2012, meeting be approved as submitted. James Lee seconded the motion. The motion carried.

Administrative Reports

Licensure Applications

Action: James Lee moved that the Physical Therapy Section ratify, as submitted, the individuals approved by the Occupational Therapy, Physical Therapy, and Athletic Trainers Board to sit for the National Physical Therapy Examination for physical therapists and physical therapist assistants from January 19, 2012 through, March 8, 2012, taking into account those individuals subject to discipline, surrender, or non-renewal. Mr. Lee further moved that the following persons be licensed as physical therapists/physical therapist assistants pending passage of the National Physical Therapy Examination and Ohio Jurisprudence Examination. Mary Kay Eastman seconded the motion. Ronald Kleinman abstained from voting. The motion carried.

Physical Therapist – Examination

Coate, Roger
Ge, Weiqing
Godfrey, Laine
Palani, Thendral
Tripodis, Stamatios
Whitehead, Natasha

Deitz, Ashley
Giacomo, Gretchen
Kozak, Katherine
Shah, Mital
Venezia, Rachel

Fitzgerald, Jennifer
Giddens, Amanda
O'Neill, Thomas
Soltesz, Dedra
Walter, Timothy

Physical Therapist Assistant – Examination

Azzarello, Samantha
Choi, Michael
Debruine, Kendra
Ford, Shawn
Hardy, Amber
Koelsch, Kelly
Myers, David
Treen, Lindsey

Ballhaus, Eric
Crook, Tokchanahe
Diehl, Whitney
Fox, Mark
Hartley, Melanie
Merricle, Richard
Robinson, Jeffrey
Walker, Mindy

Black, Nancy
Cruea, Michelle
Felver, Amanda
Fulton, Brian
Hutchings, Thomas
Muckleroy, Michael
Smith, Holly

Action: James Lee moved that the Physical Therapy Section ratify, as submitted, the physical therapist and physical therapist assistant licenses issued by endorsement and reinstatement by the Ohio Occupational Therapy, Physical Therapy, and Athletic Trainers Board from January 19, 2012 through, March 8, 2012, taking into account those licenses subject to discipline, surrender, or non-renewal. Raymond Bilecky seconded the motion. Ronald Kleinman abstained from voting. The motion carried.

Physical Therapist – Endorsement

Altubasi, Ibrahim
Duffy, Brian
Harrits, Sarah
Krajcik, Stephanie
Mariacher, Aaryn
McLean, Wendy
Morphy, Aaron
Sharp, Jamie

Bosken, Laura
Ferrara, Alison
Hopkins, Donna
Krason, Matthew
Mathews, Colleen
Miers, David
Motimaya, Karen
Ujek-Nardo, Tiffany

Cooper, Ian
Fields, Sydney
Kaminska, Michael
Kvitko, Melinda
McGarry, Susan
Morgan, Lucas
Prickett, Andrew

Physical Therapist Assistant – Endorsement

Brown, Amy

Davidson, Melinda

Zmina, Lianna

Physical Therapist Reinstatement

Brattin, Lisa
Geletka, Bryan
Lynch, Cameron
Wyman, Gordon

Breedlove, Gerald
George, Sharon
Meehan, Karli

Cody, Brad
Harr, Heather
Sandy, Daniel

Physical Therapist Assistant Reinstatement

Brennan, Mary
Streets, Ginger

Greco, Valerie

Harrison, Sandi

Testing Accommodations Requests

Action: James Lee moved that the Section grant the testing accommodation of additional time: time and a half and deny the request for a paper examination for the National Physical Therapy Examination and Ohio Jurisprudence Examination for physical therapist assistant examination file #5147924 based on the documentation provided. Karen Holtgreffe seconded the motion. James Lee and Ronald Kleinman abstained from voting. The motion carried. The Section granted the testing accommodation request for Sarah Rush

Action: James Lee moved that the Section grant the testing accommodation of additional time: time and a half for the National Physical Therapy Examination and Ohio Jurisprudence Examination for physical therapist assistant examination file #5148881 based on the documentation provided. Raymond Bilecky seconded the motion. James Lee and Ronald Kleinman abstained from voting. The motion carried. The Section granted the testing accommodation request for Heidi Perry.

Action: James Lee moved that the Section grant the testing accommodation of additional time: time and a half and separate testing room for the National Physical Therapy Examination and Ohio Jurisprudence Examination for physical therapist assistant examination file #5156507 based on the documentation provided. Mary Kay Eastman seconded the motion. James Lee and Ronald Kleinman abstained from voting. The motion carried. The Section granted the testing accommodation request for Brian Fulton.

Request for Waiver of English Equivalency Examinations for Licensure

Action: James Lee moved that the Section to grant a waiver of the TOEFL requirement for the physical therapist endorsement file #5148463 based on the documentation provided. Karen Holtgreffe seconded the motion. James Lee and Ronald Kleinman abstained from voting. The motion carried. The Section granted a waiver of the TOEFL requirement for Michelle E. Arbesman.

Action: James Lee moved that the Section grant a waiver of the TOEFL requirement for the physical therapist endorsement file #5038048 based on the documentation provided. Mary Kay Eastman seconded the motion. James Lee and Ronald Kleinman abstained from voting. The motion carried. The Section granted a waiver of the TOEFL requirement for Cheryl O. Tan.

Continuing Education Approval Request

Action: Sam Coppoletti moved that the Section grant a waiver of 24 hours of continuing education for the 2014 licensure renewal for physical therapist file #4194026 based on the documentation provided. Raymond Bilecky seconded the motion. Zero members voted for the motion, six members voted against the motion. Sam Coppoletti and Ronald Kleinman abstained from voting. The motion was defeated. As a result, the continuing education waiver request was denied. Sam Coppoletti will contact the licensee to explain the options for completing the CE requirements.

Action: Sam Coppoletti moved that the Section grant approval to use a course taken on January 18, 2011 towards the continuing education requirement for the 2013 renewal for physical therapist assistant file #4857724 based on the documentation presented and provided that the course has a valid Ohio Approval Number. Raymond Bilecky seconded the motion. Sam Coppoletti abstained from voting. The motion carried. The Section granted approval to use a course taken on January 18, 2011 towards the continuing education requirement for the 2013 renewal for William Bartsch PTA.

Action: Sam Coppoletti moved that the Section deny the waiver of 24 hours of continuing education for the 2012 licensure renewal for physical therapist file #4197322 based on the documentation provided. Mary Kay Eastman seconded the motion. Sam Coppoletti abstained from voting. The motion carried. The Section denied the continuing education waiver request for Harold Welner, PT.

Action: Sam Coppoletti moved that the Section deny the continuing education activity for physical therapist file #4198408 based on the documentation provided. Mary Kay Eastman seconded the motion. Sam Coppoletti and Ronald Kleinman abstained from voting. The motion carried. The Section denied the request for continuing education approval for Kimberly Mullholand, PT.

Assistant Attorney General's Report

Yvonne Tertel, AAG, had no formal report for the Section.

Case Review Liaison Report

Raymond Bilecky reported that the Enforcement Division closed six and opened nine new cases since the January 19, 2012 meeting. There are nineteen cases currently open. There are three disciplinary consent agreements, two adjudication orders, and one non-disciplinary agreement being monitored.

Enforcement Actions

Thomas Caldwell recommended that a notice of opportunity for a hearing be issued for case PT-FY12-021 for physically striking a patient, a violation of rule 4755-27-05 of the Administrative Code. **Action:** Sam Coppoletti moved that a notice of opportunity for a hearing be issued for case PT-FY12-021 for physically striking a patient, a violation of rule 4755-27-05 of the Administrative Code. Mary Kay Eastman seconded the motion. Thomas Caldwell, Raymond Bilecky and Ronald Kleinman abstained from voting. The motion carried.

Thomas Caldwell recommended that a notice of opportunity for a hearing be issued for case PT-FY12-023 for pending criminal charges for falsification of prescription medication documents, a violation of rule 4755-27-05 of the Administrative Code. **Action:** Karen Holtgreffe moved that a notice of opportunity for a hearing be issued for case PT-FY12-023 for pending criminal charges for falsification of prescription medication documents, a violation

of rule 4755-27-05 of the Administrative Code. Lynn Busdeker seconded the motion. Thomas Caldwell, Raymond Bilecky and Ronald Kleinman abstained from voting. The motion carried.

Correspondence

- 1. David Zwack:** Mr. Zwack asked the Section what references in the Ohio Physical Therapy Practice Act that a physical therapist can demonstrate that wound care is within the scope of practice for physical therapy. **Reply:** It is the position of the Physical Therapy Section that physical therapy includes wound and burn care with appropriate dressing and administration of topical drugs. Physical therapy also includes sharp wound debridement providing the physical therapist has been trained in the procedure. Wound management and care of the integumentary system is an integral component in physical therapy practice, as noted in the *Guide to Physical Therapist Practice, Second Edition* (pp. S116-117 and S587-S673).
- 2. Bethany Barker:** Ms. Barker asked the Section how many physical therapist assistants can a physical therapist supervise. **Reply:** The Ohio Physical Therapy Practice Act is silent on the supervision ratio for physical therapist assistants and does not regulate caseloads. However, the Section requires the physical therapist to ensure appropriate patient management based on the unique needs of the clients, taking into account the complexity of the patient population and the skills of the physical therapist assistants. The ultimate responsibility for care of the patient lies with the evaluating physical therapist regardless of whether the therapist or physical therapist assistant provide follow-up treatment. In any given period of time, a physical therapist must not provide or supervise care for a higher number of patients than that for which skilled care by licensed practitioners can be delivered.
- 3. Bob Swinehart:** Mr. Swinehart asked the Section whether it would be inappropriate for a physical therapy clinic can advertise that they can perform both physical therapy services and chiropractic care services. **Reply:** A physical therapy clinic that did not employ a licensed chiropractor that advertised that it can perform chiropractic care services would appear to violate the Ohio Chiropractic Practice Act (ORC 4734.14 (A)(1) and (3)), which states that “No person shall engage in the practice of chiropractic without a current, valid license issued by the state chiropractic board under this chapter, and no person shall open or conduct an office or other place for the practice of chiropractic without a license from the board.” It is the position of the Physical Therapy Section that a physical therapy practice stating that it performs chiropractic care services may be a violation of section 4755.47(A)(12) of the Ohio Revised Code, which states that a licensee can be subject to disciplinary action for “making a false, fraudulent, deceptive, or misleading statement in the solicitation of or advertising for patients in relation to the practice of physical therapy.”
- 4. Julie Fernandez:** Ms. Fernandez asked the Section a question regarding transferring care to another physical therapist. **Reply:** No, a formal transfer is not needed. It is the opinion of the Physical Therapy Section that if two or more physical therapists are participating in a job-sharing caseload, and if they are assuming collective responsibility for a patient's care each day, then their working would not require a transfer of care since they are not terminating the physical therapist/patient relationship. This information is available on the Board's website in the Frequently Asked Questions section. In the example you have given it is not necessary to complete a transfer of care when someone takes a few days off. The rule is for other situations where a PRN therapist completes the examination and evaluation but will not provide any further care of the patient.
- 5. Jackie Williams:** Ms. Williams asked the Section questions regarding the legality of providing a restorative program for clients who are unable to continue a home exercise program. **Reply:** There is nothing in the Ohio Physical Therapy Practice Act that prohibits a physical therapist or physical therapist assistant from giving health and wellness lectures, demonstrations, or general information on the benefits of different types of exercise provided the practitioner is knowledgeable in the content. However, under current Ohio law, a physical therapy practitioner providing fitness or wellness services to individual clients or groups must follow regulations for physical therapy practice if the services are represented as physical therapy, if the provider is identified as a physical therapist or physical therapist assistant, or if he/she signs “PT” or “PTA” after his/her name. If any of these conditions exists, the physical therapist must perform an evaluation prior to providing services, must maintain documentation of care provided, and must notify the client's primary physician if working without a physician referral. If physical therapist assistants, other licensed personnel, or students are involved in providing fitness or wellness services as physical therapy, rules in the Ohio Administrative Code for delegation and supervision apply. No part of these services may

be delegated to unlicensed personnel. If fitness or wellness programs or group exercises are not represented as physical therapy, they do not fall under the jurisdiction of the Physical Therapy Practice Act. While physical therapists or physical therapist assistants providing such services may include their educational degrees in published materials, they should not use the credentials "PT" or "PTA" and should not state that the programs are led by physical therapists or physical therapist assistants. The Physical Therapy Section recommends that the appropriate medical screenings are in place prior to exercise to ensure the safety of the participants, but the fitness/wellness records should be stored separately from physical therapy or medical records. Your second question, relates to your ability to treat patients who previously participated in your exercise group. While it is not against the law to treat these patients, the situation could potentially violate rule 4755-27-05 (A)(4) of the Administrative Code. This provision of the code of ethical conduct for physical therapists and physical therapist assistants states that a licensee shall not intentionally or knowingly offer to pay or agree to accept any compensation, directly or indirectly, overtly or covertly, in cash or in kind, to or from any person or entity for receiving or soliciting patients or patronage, regardless of the source of the compensation.

6. **William Benoit**: Mr. Benoit asked the Section for reconsideration on the Section's opinion from January 2012, on whether physical therapist assistant can determine and document that a client's goal has been met. **Reply**: Thank you for your comments. The Board reviewed the information you provided from APTA and feel it agrees with our position. The physical therapist assistant cannot formally reassess if goals are met but can collect the data for review and interpretation by the physical therapist. When the Board reviews this rule in the future, we recommend that you provide your comments during the rule review process.
7. **Jamie Geese**: Ms. Geese asked the Section whether physical therapy practitioners are legally allowed to mix prescriptions or over the counter drugs with ultrasound gel to perform phonophoresis with a physician prescription. **Reply**: Please review the *Guidelines for Use of Pharmaceuticals in Physical Therapy* document, which you can download from the Board's website (<http://otptat.ohio.gov/PhysicalTherapy/Publications.aspx>). Per this guidelines outlined in this document, a physical therapist or physical therapist assistant cannot mix prescription medications with ultrasound gel. It should be noted, however, that a cream itself (not an ointment) is sufficient and does not require ultrasound gel for transmission of the sound wave.
8. **Melissa Mitchell, PT, DPT**: Dr. Mitchell, PT, asked the Section whether a physical therapist assistant may be supervised by a physical therapist that works for a different company. **Reply**: It is the position of the Physical Therapy Section that nothing in the Ohio Physical Therapy Practice Act prohibits a physical therapist employed by one agency from supervising a physical therapist assistant employed by a different agency. The Section suggests that the two agencies may want to have a written agreement that specifies how the differing agency policies and procedures are to be followed. Regardless of employers, the physical therapist must have the authority to direct and correct patient care services provided by a physical therapist assistant. The physical therapist has the ultimate responsibility for the patient care and must assure that the care is provided in accordance with rules 4755-27-01 to 4755-27-05 of the Ohio Administrative Code, that treatments are rendered according to safe and ethical standards, and are of a type and quality to be effectual to the client's needs.
9. **Carina Siracusa, PT, DPT**: Dr. Siracusa, PT, asked the Section whether a physical therapist can pre mix medication for phonophoresis with instructions from the pharmacy or physician. **Reply**: Please review the *Guidelines for Use of Pharmaceuticals in Physical Therapy* document, which you can download from the Board's website (<http://otptat.ohio.gov/PhysicalTherapy/Publications.aspx>). Per this guidelines outlined in this document, a physical therapist or physical therapist assistant cannot mix prescription medications with ultrasound gel. It should be noted, however, that a cream itself (not an ointment) is sufficient and does not require ultrasound gel for transmission of the sound wave.
10. **Cassandra Zoll**: Ms. Zoll asked the Section if a physical therapist assistant can fill out the objective portion of a discharge summary, perform a massage, and malpractice insurance required to practice physical therapy. **Reply**: The Section will finalize the response at the May 24, 2012 Section meeting.
11. **Fadia Nader**: Ms. Nader asked the Section for clarification regarding the timeliness of documenting physical therapy recertification. **Reply**: Your questions relate to payer policies and not to the Ohio Physical Therapy Practice Act. The Physical Therapy Section recommends that you contact the appropriate insurance company or the Ohio Chapter or Reimbursement Department of the American Physical Therapy

Association. The Physical Therapy Section also suggests that you review “Defensible Documentation for Patient/Client Management” on the American Physical Therapy Association website (<http://www.apta.org>). It is based on APTA’s *Guidelines: Physical Therapy Documentation of Patient/Client Management*.

12. **Tonnie Waybright**: Ms. Waybright asked the Section if a physical therapist assistant can perform a timed up and go test independently as part of a balance clinic. **Reply**: If the balance clinic you are describing is a screening for balance issues and the individuals to be tested are not actively being seen by a physical therapist with an established plan of care, then you cannot do the timed up and go. On another topic, the Physical Therapy Section is working to educate physical therapists and physical therapist assistants in the correct credentials to use in professional signatures. Since PT or PTA is the regulatory designation allowing practice, rule 4755-27-07 of the Administrative Code requires that only those letters should immediately follow the person’s name. Academic degrees may then follow the regulatory credential. For example, a nametag or signature might read Pat Doe, PT, MS, OCS. “L” should not be used in front of “PT” or “PTA” since no one may use the “PT” or “PTA” credential in Ohio without a valid license.
13. **Anita Zeigler, PT, DPT**: Dr. Zeigler asked the Section for clarification on how a physical therapist can to demonstrate competence in casting AFO/DAFO for kids. **Reply**: It is the position of the Physical Therapy Section that a physical therapist may perform all services that are within the scope of practice of physical therapy. However, it is the individual physical therapist’s responsibility to produce evidence of appropriate training and demonstrate knowledge and competency in the delivery of any procedure, treatment, or service.
14. **Tandra Adams**: Ms. Adams asked the Section whether physical therapy practitioners can disconnect/reconnect a feeding tube if they are trained and can demonstrate competency in this procedure. **Reply**: There is nothing in the Physical Therapy Practice Act that prohibits a physical therapist from disconnecting/reconnecting feeding tubes. As you noted in your letter, no procedure should be performed by a physical therapist unless the practitioner demonstrates competence in that procedure.
15. **Myah Thies**: Ms. Thies asked the Section questions regarding clarification on billing for work conditioning clients. **Reply**: There is nothing in the Physical Therapy Practice Act that prohibits a physical therapist from disconnecting/reconnecting feeding tubes. As you noted in your letter, no procedure should be performed by a physical therapist unless the practitioner demonstrates competence in that procedure.
16. **Kristin Riebe**: Ms. Riebe asked the Section questions regarding whether it is legal for physical therapist to provide therapy services via skype. **Reply**: The Ohio Physical Therapy Practice Act is silent on the use of telerehabilitation in physical therapy practice.
17. **Heather Fenton-Campbell**: Ms. Fenton-Campbell asked the Section questions regarding whether it is required to list a specific goal or some reference in the physical therapy plan of care that the home visit can be completed by a physical therapist assistant. **Reply**: The Physical Therapy Section recommends that there be some reference in the plan of care for the need to complete a home assessment.
18. **Hugh Walker**: Mr. Walker asked the Section whether a physical therapist who holds a doctorate degree can write a prescription for cervical traction, tens, or nms. **Reply**: The Ohio Physical Therapy Practice Act is silent on the whether or not physical therapists may write prescriptions for DME. Insurance companies however might have different policies. Therefore, the Physical Therapy Section recommends that you contact the appropriate third party payer to address your specific question. You may also get information from the Reimbursement Department of the Ohio chapter of the American Physical Therapy Association.

OT/PT Joint Correspondence

- JB1. **Jean Wendland, PT**: Ms. Wendland asked the Occupational and Physical Therapy Sections whether a physician order is required to receive Medicare reimbursement for occupational and physical therapy services. **Reply**: Occupational therapists are not required to have a referral and/or prescription to evaluate or treat patients in the State of Ohio. However, hospital or facility policies, accrediting bodies, and/or reimbursement agencies may have other requirements and guidelines, including requiring a physician’s referral and/or prescription, which need to be met for accreditation and/or reimbursement of occupational therapy services. It is not within the jurisdiction of the Occupational Therapy Section to render billing and reimbursement advice. The Section recommends that you refer to payer policies for any specific billing and reimbursement requirements in your setting, specifically this regions Medicare intermediary. You might also contact the Ohio Occupational Therapy Association, or the Reimbursement Department of the

American Occupational Therapy Association. Section 4755.481 of the Revised Code permits a physical therapist to provide services without a physician order or referral. If a patient is seen under the direct access law, the Physical Therapy Section recommends that the patient be asked to sign a document declining notification of the physician. However, hospital or facility policies, accrediting bodies, and/or reimbursement agencies may have other requirements and guidelines, including requiring a physician's referral and/or prescription, which need to be met for accreditation and/or reimbursement of physical therapy services. The Sections recommend that you refer to Medicare, Medicaid, and/or payer policies for any specific billing and reimbursement requirements in your setting. You might also contact the Ohio Occupational Therapy Association, the Ohio Physical Therapy Association, or the Reimbursement Departments of the American Occupational Therapy Association and American Physical Therapy Association.

- JB2.** **Lyndi Schwab, PT:** Ms. Schwab asked the Occupational and Physical Therapy Sections whether it is acceptable for occupational and physical therapists to sign the medication sheets in a client's chart. **Reply:** There is nothing in the Ohio Occupational Therapy Practice Act that prohibits an occupational therapist from completing medication reconciliation provided that the occupational therapist has received training, demonstrated and documented competence in this activity. There is nothing in the Physical Therapy Practice Act that prohibits a physical therapist from performing a medication reconciliation that includes interviewing a patient about current medications, comparing those to the list of prescribed medications, and implementing a computerized program or referring the lists to other practitioners to identify suspected drug interactions. Even though not part of the physical therapy plan of care, the reconciliation may be performed as an administrative task of any health care professional. Other such administrative tasks that are not part of a physical therapy plan of care but that may be performed by physical therapy personnel include removal of staples, coaguchecks, listening for bowel sounds, and other patient assessments. However, no procedure should be performed by a physical therapist or physical therapist assistant unless the practitioner demonstrates competence in that procedure. You may also wish to view the APTA's Home Health Section FAQ regarding medication reviews.
- JB3.** **Joy Sims, PT:** Ms. Sims asked the Occupational and Physical Therapy Sections a question regarding how long a prescription for occupational and physical therapy is valid. **Reply:** Occupational therapists are not required to have a referral and/or prescription to evaluate or treat patients in the State of Ohio. However, hospital or facility policies, accrediting bodies, and/or reimbursement agencies may have other requirements and guidelines, including requiring a physician's referral and/or prescription, which need to be met for accreditation and/or reimbursement of occupational therapy services. Thus, any time limits on an occupational therapy order would be up to your facility or payer policy. There is nothing in the Ohio Physical Therapy Practice Act that dictates the length of time that a referral is valid. If you have a case or patient where a referral is required, the Physical Therapy Section recommends that, at a minimum, referrals be renewed annually. The Section recognizes that third party payers may require physical therapists to follow more specific requirements.
- JB4.** **Kathy Meyers, OT:** Ms. Meyers asked the Occupational and Physical Therapy Sections whether occupational and physical therapy practitioners in a school-based setting are required to print a hard copy of the results of the license lookup/verification in E-Licensing and file the results at each school where therapy is provided. **Reply:** Rules 4755-3-02 (B) and 4755-23-05 (B) of the Ohio Administrative Code requires all occupational therapy and physical therapy practitioners, respectively, to have available at all locations of service delivery a copy of his/her current license information from the Ohio e-License Center verification page (<https://license.ohio.gov/lookup>). If the verification can be accessed electronically at the school, the licensee is not required to print and file a hard copy of this page at each school. If there is no electronic access at a school, the licensee is permitted to print and file the copy with that school.
- JB5.** **Mary Stoffiere:** Ms. Stoffiere asked the Occupational and Physical Therapy Sections if occupational and physical therapy practitioners can disconnect/reconnect a feeding tube during transfers if they are trained and can demonstrate competency in this procedure. **Reply:** There is nothing in the Ohio Occupational Therapy Practice Act that prohibits an occupational therapist from disconnecting/reconnecting a feeding tube for transfers, provided that the occupational therapist has received training, demonstrated and documented competence in this activity. There is nothing in the Physical Therapy Practice Act that prohibits a physical therapist from disconnecting/reconnecting a feeding tubes, As you noted in your letter,

no procedure should be performed by a physical therapist unless the practitioner demonstrates competence in that procedure.

JB6. Janelle Gant, PT: Ms. Gant asked the Occupational and Physical Therapy Sections if there has been communication with the Board and ODE regarding best practices for documenting services provided by the assistants on IEP. **Reply:** This question relates to Ohio Department of Education (ODE) regulations and not to the laws and rules that regulate the practice of occupational therapy and physical therapy. The Sections recommend that you contact Cathy Csanyi, the Occupational Therapy/Physical Therapy Specialty Consultant with the Ohio Department of Education, Office for Exceptional Children at cathy.csanyi@ode.state.oh.us to address the situation described in your email. Regarding the position of the Occupational Therapy and Physical Therapy Sections on this issue, representatives from the Occupational Therapy and Physical Therapy Sections met with ODE Office for Exceptional Children administrators, including Kathe Shelby and Ann Guinan, in November 2009 and the issue of how to document therapy providers in Section 7 was discussed. At that time, the Board tried to make it clear that, while an OTA or PTA may be providing the majority of direct services to a student, the supervising therapist will be providing direct service at times as well. Listing the assistant alone on the provider line would not be accurate because the assistant cannot provide services without the supervising therapist. We agreed with ODE that it is important that parents and team members understand who will be providing the majority of direct services and the extent to which the therapist and assistant will be working with the student. In a follow-up letter to ODE sent on February 9, 2010, the Occupational Therapy and Physical Therapy Sections stated: The Board appreciates the concerns that the Department has about parents misinterpreting the information contained on the IEP. For this reason, we recommend that in section 7 of the IEP, when "occupational therapy services" or "physical therapy services" are listed under the "Types of Services" the "Provider Title" be "licensed occupational therapy practitioner" or "licensed physical therapy practitioner" instead of listing out the OT/PT or OTA/PTA. The amount of direct services would be the total amount of time the student is receiving from OT or PT services, either from the OT/PT or OTA/PTA. The Ohio Occupational Therapy Association's pediatrics member support group chair may be able to assist you with many of your questions regarding school based practice. You can contact the Ohio Occupational Therapy Association at www.oota.org.

JB7. Christa Thomas: Ms. Thomas asked the Section if occupational therapy assistants and physical therapist assistants can write order for therapy in patient charts. **Reply:** Occupational therapists are not required to have a referral and/or prescription to evaluate or treat patients in the State of Ohio. The decision whether an occupational therapy assistant or occupational therapist is permitted to write orders for therapy in patient charts is based on facility policy. Accrediting bodies and/or reimbursement agencies may have other requirements and guidelines, including requiring a physician's referral and/or prescription, which need to be met for accreditation and/or reimbursement of occupational therapy services. Please note that any documentation by an occupational therapist assistant must be co-signed by the supervising occupational therapist. It is the position of the Physical Therapy Section that a physical therapist assistant may enter a referral in the patient records. As with all documentation by a physical therapist assistant, these entries must be co-signed by the supervising physical therapist. The physical therapist is the individual responsible for receiving, interpreting, and accepting the directive or order as part of the care of the patient.

Old Business

Update on Dry Needling (Intramuscular Manual Therapy)

Karen Holtgreffe reported that she spoke with Frank Gargano, PT, from Solon, Ohio. Mr. Gargano is Mulligan certified in manual therapy and has used manual therapy in his practice for several years. It is the position of the Physical Therapy Section that intramuscular manual therapy should not be considered as entry level practice. It is a skill that is learned after practicing over a period of time.

Update on Concussion Management

There was no formal report given.

Continuing Competence Taskforce Update

There was no formal report given.

New Business

Retreat Planning

The Section retreat will be held on April 11, 2012 at the OSU Sports Medicine CarePoint at Gahanna. The retreat topics are: expungement of discipline, continued competency, teletherapy, accountable care organizations, FSBPT motions, fixed date testing update, and renewal grace periods.

Open Forum

The Section opened the floor for Ohio University physical therapy students to ask questions.

The Chair noted that the new Board Member, Ronald Kleinman turned in his remaining documentation to the Governor's Office. He is officially able to vote as of 11:00am today.

Ohio Physical Therapy Association (OPTA) Report

Shane Yates informed the Section that:

- OPTA Annual Conference will be held on March 29-31, 2012 at the Doubletree in Worthington.
- OPTA started the audit process for Continuing Education Committee.
- APTA Combined Sections Meeting will be held on January 21-24, 2013 in San Diego, CA
- OPTA is looking for new Chair and Secretary for Continuing Competence Taskforce.
- Advocacy Day will be held on May 1, 2012. Registration will open the end March 2012.
- James Lee is the recipient of OPTA's outstanding clinical service of the year award.

Federation of State Boards for Physical Therapy (FSBPT) Report

- National Physical Therapy Examination for physical therapist assistants began fixed date testing on March 1, 2012. FSBPT changed deadline for candidates to register for the NPTE to allow time to be approved by jurisdictions before the testing sets are released by Prometric.

Items for Next Meeting

- Update on Dry Needling
- Update on Concussion Management
- Update on Continuing Competence Task Force

Next Meeting Date

The next regular meeting date of the Physical Therapy Section is scheduled for Thursday, May 24, 2012.

Adjournment

Mary Kay Eastman moved that the meeting be adjourned. Karen Holtgreffe seconded the motion. The motion carried. The meeting adjourned at 3:13 p.m.

Respectfully submitted,
Diane Moore

Thomas Caldwell, PT, Chair
Ohio Occupational Therapy, Physical Therapy,
and Athletic Trainers Board, PT Section

Sam Coppoletti, PT, Secretary
Ohio Occupational Therapy, Physical Therapy,
and Athletic Trainers Board, PT Section

Jeffrey M. Rosa, Executive Director
Ohio Occupational Therapy, Physical Therapy
and Athletic Trainers Board

SC:jmr:dm