



Ohio Occupational Therapy, Physical Therapy,  
and Athletic Trainers Board

*Physical Therapy Section*  
*September 11, 2014*  
*9:30 a.m.*

**Members Present**

Lynn Busdeker  
Matthew Creed  
Karen Holtgreffe, Secretary  
Ronald Kleinman, Chair  
James Lee  
Chad Miller  
Trevor Vessels, Public Member

**Staff Present**

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

**Guests**

Halle Runion, OPTA  
Carolyn Towner, OPTA  
Raymond Bilecky  
Thomas Caldwell

**Legal Counsel**

Melissa Wilburn, Assistant Attorney General

**Call to Order**

Ronald Kleinman, Chair, called the meeting to order at 9:34 a.m. The Section welcomed Melissa Wilburn, the new Assistant Attorney General.

**Approval of Minutes**

**Action:** James Lee moved that the minutes from the July 10, 2014, meeting be approved as amended. Chad Miller seconded the motion. The motion carried.

**Special Orders**

*Election of Officers*

**Action:** Karen Holtgreffe nominated Ronald Kleinman to be Section Chairperson for the period beginning September 11, 2014 and ending immediately following the September 2015 Section meeting. The nominations were closed. All members present voted to elect Ronald Kleinman Section Chairperson.

**Action:** Karen Holtgreffe nominated James Lee to be Section Secretary for the period beginning September 11, 2014 and ending immediately following the September 2015 Section meeting. The nominations were closed. All members present voted to elect James Lee Section Secretary.

**Action:** James Lee nominated Lynn Busdeker to serve as Ohio's delegate to the 2015 FSBPT Delegate Assembly. The nominations were closed. All members present voted to elect Lynn Busdeker FSBPT delegate.

**Action:** Karen Holtgreffe nominated Matthew Creed to serve as Ohio's alternate delegate to the 2015 FSBPT Delegate Assembly. The nominations were closed. All members present voted to elect Matthew Creed as the FSBPT alternate delegate.

**Liaison Appointments**

The liaison appointments beginning September 11, 2014 and ending September 30, 2015 are:

Enforcement Division Liaisons:	Karen Holtgreffe and Chad Miller
Licensure Liaison:	Chad Miller
Continuing Education Liaison:	Ronald Kleinman
Correspondence Liaisons:	Lynn Busdeker and Matthew Creed
Rules Liaison	James Lee

**Action:** James Lee moved to authorize the Executive Director to accept or reject consent agreements on the Section's behalf for the period beginning September 11, 2014 and ending on September 30, 2015. Lynn Busdeker seconded the motion. The motion carried.

**Action:** James Lee moved to authorize the use of signature stamps or electronic signatures by the Section Chairperson, Section Secretary, and the Executive Director for the period beginning September 11, 2014 and ending on September 30, 2015. Karen Holtgreffe seconded the motion. The motion carried.

**Action:** James Lee moved to authorize the Executive Director to make editorial changes to motions for the period beginning September 11, 2014 and ending on September 30, 2015. Chad Miller seconded the motion. The motion carried.

**Action:** James Lee moved to authorize the use of hearing officers for the period beginning September 11, 2014 and ending on September 30, 2015. Karen Holtgreffe seconded the motion. The motion carried.

**Action:** James Lee moved to authorize the staff to issue licenses to applicants with completed applications and that the Section ratify the licenses issued by the staff at the Section meeting following issuance of license for the period beginning September 11, 2014 and ending on September 30, 2015. Matthew Creed seconded the motion.

### **Discussion of Law and Rule Changes**

There were no items discussed.

### **Administrative Reports**

#### **Licensure Applications**

**Action:** Chad Miller 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 July 10, 2014 through September 11, 2014, taking into account those individuals subject to discipline, surrender, or non-renewal. Mr. Miller 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. James Lee seconded the motion. The motion carried.

#### **Physical Therapist – Examination**

Bachmayer, Amanda  
Barto, Amethyst  
Boehler, Mark  
Chavan, Priti  
Davis, Autumn  
Dray, Daniel  
Eickelman, Angela  
Flaschberger, Lisa  
Fullenkamp, Courtney  
Glass, Paul  
Hershey, Katie  
Knopf, Ellen  
Loar, Margaret  
Manley, Katelyn  
McBride, Erin  
Mikesell, Addie  
Montgomery, Nichole  
O'Rear, Stephen  
Ream, Alexander  
Rozeski, Brynn  
Scott, Anna  
Smith, Monica  
Subler, Kevin

Ballman, Matthew  
Bint, Ashley  
Bogner, Kerry  
Cole, Melanie  
Davis, Autumn  
Edgehouse, Thomas  
Ely, Matthew  
Francia, Joseph  
Galyas, Elizabeth  
Grubbs, David  
Hopkins, Sherrice  
Kramer, Hannah  
Luthman, Tyler  
Martien, David  
Meeks, Kayla  
Miller, David  
Mowrer, Megan  
Powers, Juliette  
Roberge, Kylee  
Schomaeker, Justin  
Shroll, Kyle  
Spriggs, Kyle  
Terken, Tonya

Barnett, Raina  
Blosser, Erika  
Chandler, Aaron  
Cowden, Brittany  
Decates, Aliya  
Eichelberger, Courtney  
Etler, Nathan  
Frelek, Malgorzata  
Gardner, Maura  
Hall, Emma  
Kinn, Michelle  
Krishnan, Lakshmi  
Mangiarelli, Robert  
May, Meghan  
Messina, Caitlin  
Mong, Rachael  
Nielsen, Matthew  
Rawlins, Kirby  
Roberts, Michael  
Schumann, Sarah  
Smith, Alisha  
Subler, Kevin  
Walthour, Colin

White, David

Witt, Heather

Zimmermann, Christine

Physical Therapist Assistant – Examination

Albright, Twyla  
Bach, Laura  
Berry, Sean  
Boyer, Derek  
Bromley, Caitlyn  
Buhrow, Danielle  
Case, Brittany  
Clark, Abigail  
Daniel, Samantha  
Detwiler, Calvin  
Evans, Bethany  
Garey, Daniel  
Gerlach, Paige  
Girard, Joel  
Greathouse, Beth  
Harris, Alexis  
Hastings, Taryn  
Herman, Kelly  
James, Tamika  
Kangas, Charles  
Krisjanis, Ursula  
Lawson, Danielle  
Lenhart, Jessica  
Maresch, Maria Del Val  
Martin, Justin  
McClintic, Eric  
Morton, Nicholas  
Nauta, Wesley  
Oney, Joseph  
Palmer, Autumn  
Poling, Emily  
Rice, Patrick  
Robertson, Shileigh  
Scherger, Matthew  
Schweitzer, Julee  
Shirey, Danell  
Sigler, Bryant  
Spence, Jennifer  
Tareke, Haregeweyni  
Valentine, Alexandra  
Wagner, Stephen  
Wergers, Christina  
Williams, Kylee  
Zimmerman, Tara

Ashworth, Justin  
Barnes, Alisha  
Beyke, Nichole  
Brackett, James  
Brooks, Nycole  
Burton, Matthew  
Cheney, Scott  
Coder, Megan  
Delzeith, Teresa  
Eakins, Richard  
Fisher, Denise  
Garrett, Megan  
Gill, Nicholas  
Goossens, Mitchell  
Griggs, Schanelle  
Haser, Brittany  
Heaton, Debra  
Hughes, Alecia  
Jefferson, Coleen  
Kangas, Charles  
Lake, Casey  
Lefever, Jared  
Lockso, Andrew  
Markin, Trisha  
Marvel, Nathaniel  
Mendoza, Maribel  
Moyer, Kara  
Nichols, Jordan  
Ostrander, Dorina  
Papst, Stephanie  
Ray, Garrett  
Riedel, Montgomery  
Romeo, Natalie  
Schlachter, James  
Sferra, Alison  
Shoup, Andrew  
Smead, Michael  
Splitstone, Stacy  
Thiel, Michelle  
Vonaschen, Chelsea  
Wahl, Devinn  
White, Melody  
Wright, Andrew

Axford, Liza  
Barr, Brandon  
Boyd, Robert  
Brandon, Alyssa  
Brush, Rhonda  
Camp, Kristin  
Chumley, Michael  
Dabbs, Robert  
Denniston, Rachel  
Engster, Megan  
Frey, Alyssa  
Gerlach, Paige  
Girard, Joel  
Goossens, Mitchell  
Hahn, Christy  
Haser, Brittany  
Hendrix, Linda  
James, Stanley  
Johnston, Katherine  
Kocka, Bethan  
Laman, Jillian  
Legraen, Garrett  
Lump, Corey  
Martin, Brandon  
May, Jessica  
Miller, Katrina  
Murdock, Jeffrey  
Nord, Scott  
Ousley, Joshua  
Penrod, Robert  
Resatar, Felicia  
Riffle, Brian  
Satterwhite, Sherae  
Schmackers, Jessica  
Sheets, Leann  
Sigler, Bryant  
Smith, Melinda  
Stone, Wendy  
Trace, Kelly  
Wagner, Michelle  
Warner, Macie  
Wilburn, Sara  
Wright, Andrew

**Action:** Chad Miller 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 July 10, 2014 through September 11, 2014, taking into account those licenses subject to discipline, surrender, or non-renewal. Karen Holtgreffe seconded the motion. The motion carried.

Physical Therapist – Endorsement

Albright, Andrew

Altobello, Mollie

Ashton, Jeffrey

Brancaleone, Matthew  
Bursley, Brett  
Conraguerro, April  
Dodo, Saratu  
Hernandez, Emily  
Kapupara, Manisha  
Narra, Sai Shanthi  
Post, Peter  
Read, Briana  
Schwebler, Stephanie  
Tracey, Sean  
Wesselman, Elizabeth

Breton, Caroline  
Chatarkar, Kanchan  
Cornell, Andrea  
Donnelly, Meghan  
Hoppe, Michelle  
Kiefer, Michael  
Patel, Vishal  
Quincy, Richard  
Ritzline, Pamela  
Smith, Dorothy  
Tucci, Alexandra  
Wright, Lydia

Bryant, Stefanie  
Cherne, Michelle  
Crouse, Timothy  
Gianni, Anthony  
Jia, Sharon  
Miller, Arlene  
Pipkin, Michael  
Rainey, Bobby  
Schearer, Susan  
Thomas, Rene  
Wayner, Robert  
Zoltowski, Shannon

Physical Therapist Assistant – Endorsement

Atkinson, Darlie  
Drennen, Brooke  
McDonald, Shellie  
Turner, Karen

Bailey, Willard  
Earley, Mary  
Rosenbeck, Michael  
West, Casey

Boardley, Karen  
Matson, Ashley  
Spears, Melissa

Physical Therapist Reinstatement

Boles, Trent

Jansen, Edward

Kerns, David

Physical Therapist Assistant Reinstatement

Robinson, Jennifer

Chad Miller recommended that the Section require physical therapist endorsement applicant #5401910 to retake the National Physical Therapy Examination based on the documentation provided. **Action:** James Lee moved that the Section require physical therapist endorsement applicant #5401910 to retake the National Physical Therapy Examination based on the documentation provided. Karen Holtgreffe seconded the motion Chad Miller abstained from voting. The motion carried. The Section will require William Gregory Oliver to retake the National Physical Therapy Examination.

The Section reviewed the additional education documents submitted for physical therapist examination file #5397092. After review of the educational documents, Chad Miller recommended that the Section uphold the Section's previous directives for the physical therapist examination applicant #5397092 to complete coursework for the deficiencies previously identified in general education as well as professional education coursework in delegation, based on the documentation provided. **Action:** Karen Holtgreffe moved that the Section uphold the Section's previous directives for the physical therapist examination applicant #5397092 to complete coursework for the deficiencies previously identified in general education as well as professional education coursework in delegation, based on the documentation provided. Lynn Busdeker seconded the motion Chad Miller abstained from voting. The motion carried. The applicant's name is Adriel Nemecc.

Testing Accommodations Requests

Chad Miller recommended that the Section grant the testing accommodation of additional time: double time and a separate room for physical therapist examination file #5396821 based on the documentation provided. **Action:** Matthew Creed moved that the Section approve the testing accommodation of additional time: double time and a separate room for physical therapist examination file #5396821 based on the documentation provided. Karen Holtgreffe seconded the motion. Chad Miller abstained from voting. The motion carried. The Section granted the testing accommodation request for Marissa Ann Lampe.

Continuing Education Liaison Report

Ronald Kleinman will forward the draft revisions of the OPTA's proposed changes to the policy and procedures for continuing education approval to the Section members for review. Mr. Kleinman further reported that OPTA did not approve the continuing education request for a proposed pilot for Academic Sponsors. This pilot would allow students who are in their final rotation to earn CE by participating in in-services at the clinics.

### Assistant Attorney General's Report

Melissa Wilburn, AAG, had no formal report.

### Case Review Liaison Report

Karen Holtgreffe reported that the Enforcement Division closed five and opened nine new cases since the July 10, 2014 meeting. There are thirty-three cases currently open. There are four disciplinary consent agreements and one adjudication order being monitored.

Karen Holtgreffe informed the Section that Marybeth Romeo complied with all terms and conditions and was released from her disciplinary consent agreement.

### Enforcement Actions

Karen Holtgreffe recommended that the Section accept the consent agreement for case PT-FY14-024 in lieu of going to a hearing. **Action:** James Lee moved that the consent agreement for case PT-FY14-024 be accepted in lieu of going to a hearing. Lynn Busdeker seconded the motion. Karen Holtgreffe abstained from voting. The motion carried. The Section accepted the consent agreement for James Percy Long III, PT.

### Correspondence

1. **Patrick Murphy, PT:** Mr. Murphy asked the Section questions regarding supervision requirements for physical therapist assistants. **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.
2. **Katheryn Gorski, PT:** Ms. Gorski asked the Section questions regarding supportive staff can perform dry needling in a physical therapy setting and asked if individuals performing dry needling are required to be certified. **Reply:** It is the position of the Physical Therapy Section that nothing in the Ohio Physical Therapy Practice Act prohibits a physical therapist from performing dry needling techniques. As with any specialized procedure, the physical therapist must have training and demonstrate competency in the modality. The manner in which the training is obtained and competency demonstrated are not addressed in the Practice Act. The Section recommends you contact the OPTA for approved coursework in dry needling at [www.ohiopt.org](http://www.ohiopt.org). In response to your question regarding if supportive staff are allowed to perform dry needling, it is the position of the Ohio Physical Therapy Section that physical therapists assistants, other unlicensed staff, or unlicensed staff cannot legally perform dry needling under the Ohio Physical Therapy Practice Act, as it requires activities that are evaluative in nature and outside the scope of practice of those individuals.
3. **Janice Cox, PTA:** Ms. Cox asked the Section questions regarding whether a physical therapist assistant can also work as a corrective exercise instructor for the same employer. **Reply:** It is the position of the Physical Therapy Section that a physical therapist/physical therapist assistant who is also practicing as another unlicensed personnel would not be governed by the Ohio Physical Therapy Practice Act provided that the therapist was not holding himself out as a physical therapist, and so long as the therapist was not billing or being reimbursed for physical therapy services. In providing services other than physical therapy, the physical therapist or physical therapist assistant must make it clear to the client or family that the therapist is acting only in this other capacity. That is, communication must be done in such a way that if the client or family is asked, he/she could clearly testify in a legal proceeding as to the role of the individual who was providing treatment. The facility must also not represent this role as being more skilled due to additional education/credentials than required for that job description. You may also wish to note that your professional liability policy (if you have one) would not cover you while acting in any capacity other than as a licensed physical therapist or physical therapist assistant. Also, Rule 4755-27-05 of the Ohio Administrative Code establishes the code of ethical conduct for physical therapists and physical therapist assistants. Paragraph (A)(5) of this rule states that "A licensee shall not influence a patient or the patient's family to utilize, purchase, or rent any equipment based on the direct or indirect financial interests of the licensee. Recommendations of equipment must be based solely on the therapeutic value of that equipment to the patient. A licensee who owns or has a direct financial interest in an equipment or supply company must disclose the financial interest to the patient if the licensee sells or rents, or intends to sell or rent, to the patient." While the licensee need not state "I'll be making a profit off your purchase," the licensee must

disclose that he/she has a financial interest in the sale of equipment. The Physical Therapy Section recommends that disclosure be provided orally and in writing and that the patient be told that the equipment is available from other vendors.

4. **Denise Balish, OTR/L:** Ms. Balish asked the Section questions regarding physical therapist assistants can perform home safety visits/home evaluations. **Reply:** A home assessment is the sole responsibility of the physical therapist. However, prior to the completion of a home assessment, the physical therapist assistant may go into the home, without patient involvement, to perform an environmental survey (architectural barriers, floor plan, etc.). If the patient is going into his/her home environment and his/her function in the home is being assessed, this assessment must be performed by a physical therapist. A physical therapist assistant may continue an established treatment plan of functional activities in the home or other non-clinical environment or may complete an environmental checklist once the patient assessment has been completed.
5. **Jason Sabo, PT, DPT:** Dr. Sabo asked the Section questions regarding whether physical therapists can fill a patient's home medication pillbox and take medication orders from a physician or a physician agent over the phone or through other electronic communications. **Reply: In response to your first question,** 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. **In response to your second question,** it is the position of the Physical Therapy Section that taking phone orders for prescription medications does not fall within the scope of physical therapy practice. You may also wish to contact the Ohio Nursing Board at [www.nursing.ohio.gov](http://www.nursing.ohio.gov) for information regarding nursing involvement in this issue.
6. **Alana Hohman:** Ms. Hohman asked the Section questions regarding billing codes. **Reply:** Your questions relate to payer policies and not to the Ohio Physical Therapy Practice Act. It is the position of the Physical Therapy Section that any service should be billed under the most descriptive intervention and diagnostic codes available. Please check with Medicare, third-party payers and, and insurance policies to address your specific questions. You may also get information from the Reimbursement Department or Ohio chapter of the APTA.
7. **Diane Cocoran , PT,:** Ms. Corcoran asked the Section questions regarding whether a physical therapist can treat a student who is a family member. **Reply:** There is nothing in the Ohio Physical Therapy Practice Act that prohibits treating a family member. However, there may be agency or insurance payer policies regarding treatment and billing for services for a family member that you should clarify prior to providing these services.
8. **Amy Brehm, PTA:** Ms. Brehm asked the Section questions regarding whether physical therapist assistants can update a short term goal. **Reply:** No, a physical therapist assistant is unable to document the status of a goal as met or not met since this constitutes an assessment.
9. **Vicky Humphrey, PT:** Ms. Humphrey asked the Section questions regarding whether cupping/massage cupping is within the scope of practice of physical therapy in Ohio. **Reply:** There is nothing in the Ohio Physical Therapy Practice Act that addresses this topic. As part of the ongoing effort to promote evidence based practice, the Physical Therapy Section suggests that when undertaking a new treatment method, you should be able to present a reasonable rationale that includes safety and effectiveness for the selection of that procedure. Your other 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.
10. **Tonya Taylor, PTA:** Ms. Taylor asked the Section questions regarding whether physical therapist assistants can perform restorative programs for client's who are not in therapy. **Reply:** It is the position of the Physical Therapy Section that a physical therapist may provide input into the development of a restorative/mobility/maintenance program under a "screening model." The physical therapist would be providing general awareness information to the Nursing Department after the completion of a screening. An example of general information would be that a resident's sitting posture might be enhanced by the use of either a solid seat insert or a wedge cushion in the resident's wheelchair. Recommendations that are more specific in nature and that could only be made after a patient evaluation is completed would require

that the physical therapist function under the provisions of sections 4755.48(G) and/or 4755.481 of the Revised Code. It is the position of the Physical Therapy Section that a physical therapist or physical therapist assistant may provide administrative oversight of an unlicensed person who is providing maintenance care after the termination of a physical therapy plan of care. Such services must not be represented as physical therapy. As long as the procedures performed are not represented as physical therapy or billed as physical therapy then this is not physical therapy and does not fall under the Ohio Physical Therapy Practice Act.

11. **Melissa Kerr, PT:** Ms. Kerr asked the Section questions regarding cash based therapy for purposes of general musculoskeletal injuries, dry needling, and or wellness/fitness. **Reply: In response to your first question**, you are correct that the appropriate provider would need to be notified that a physical therapy evaluation took place within 5 business days. The Ohio Physical Therapy Practice Act is silent on the method of this notification. However, best practice would be documentation that this notification took place. **In response to your second question**, in accordance with the laws governing provision of physical therapy services under direct access, a physical therapist may see a patient who does not wish to have a physician or other practitioner notified. The Physical Therapy Section recommends that the patient be asked to sign a document declining notification of the physician. **In response to your third question** and the subsequent follow up, you are correct that Medicare does not allow for reimbursement with direct access. 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. **In response to your fourth question**, the Ohio Physical Therapy Practice act is silent on the topic of liability insurance coverage. **In response to your final question**, the Physical Therapy Section does not dictate the format of clinical notes. The Section recommends you contact the Ohio Chapter or Reimbursement Department of the American Physical Therapy Association for information on documentation.
12. **Cheryl Burns, PTA:** Ms. Burns asked the Section questions regarding following employer requirements that are not in compliance with the State regulations on who can perform discharge summaries in a physical therapy setting. **Reply:** Rule 4755-27-03 (B)(5) of the Ohio Administrative Code states that physical therapist assistants are NOT qualified to perform the discharge evaluation and complete the final discharge summary. Discharge planning and the completion of the discharge evaluation are the responsibility of the supervising physical therapist and may be performed and documented by the physical therapist in a reasonable timeframe prior to discharge. The physical therapist assistant may provide care per that discharge assessment and plan and may document objective information about that care, but the physical therapist must then complete the final discharge summary. It is the position of the Physical Therapy Section that physical therapist assistants may gather and summarize objective information; however, they may not interpret this data. It is the responsibility of the physical therapist to interpret and make recommendations for the purpose of discharge development. If there is collaboration between the physical therapist and the physical therapist assistant, the collaboration must be reflected in the patient documentation, but only the physical therapist may document the discharge evaluation and recommendations in the discharge summary. Even if the discharge evaluation and recommendations for follow-up care are included in the initial evaluation, a discharge summary must still be completed to document final discharge date and disposition. The discharge summary may refer to the last treatment note for patient status. The ultimate responsibility for care of the patient lies with the evaluating physical therapist. Relying solely on information gathered by the physical therapist assistant during treatment does not constitute a reassessment, and may not fulfill the physical therapist's obligation to provide the appropriate standard of care. Likewise, the physical therapist assistant has a legal obligation, in the overall care of the patient, to make sure the review and assessment is performed by the physical therapist to meet the same standard of care. Best practice in the situation described, would be to have the physical therapist or therapists, involved review each previous case and write the appropriate discharge summary if was not performed previously. It is the physical therapists' duty to make sure the appropriate documentation is completed, it is also the physical therapist assistant's duty to make sure this is carried out by the physical therapist. If the supervising physical therapist or management is requesting you do otherwise and the physical therapist does not perform the appropriate re-evaluation or discharge summary, it is the supervising physical therapist who would be at fault and may receive disciplinary action. However if the physical therapist assistant is knowingly performing activities that are outside of their scope of practice then they would also be at fault and may receive disciplinary action. A licensee shall report to the physical therapy section any unprofessional, incompetent, or illegal

behavior of a physical therapist or physical therapist assistant of which the licensee has knowledge. Ethical conduct includes conforming to the minimal standards of acceptable and prevailing physical therapy practice. Conduct may be considered unethical regardless of whether or not actual injury to a patient occurred. Failure to comply may be grounds for disciplinary action pursuant to section 4755.47 of the Revised Code and in accordance with Chapter 119. of the Revised Code.

13. **Debbie Link, PT:** Ms. Link asked the Section questions regarding procedures for termination a physical therapy patient practitioner relationship. **Reply:** If a patient creates an unsafe practice situation, there is no reason why early termination would be inappropriate, as long as the situation/behavior was documented. The provider should attempt to educate/discuss the inappropriate behavior with the patient with goal of resolving the situation without early termination. However, if patient education is unsuccessful or if unable to be performed due to the severity of the situation, a discharge summary, including the reason for early discharge, should be sufficient. A formal discharge involving the patient returning to clinic for assessment should not be required.
14. **Richard Bell:** Mr. Bell asked the Section questions regarding whether physical therapists can perform EMG testing. **Reply:** It is the position of the Physical Therapy Section that nothing in the Ohio Physical Therapy Practice Act prohibits a physical therapist from performing electromyography (EMG). Performance and interpretation of EMG is consistent with the knowledge and skills of licensed physical therapists. As with any specialized procedure, the physical therapist must have training and demonstrate competency in the modality. The Physical Therapy Section recommends that you refer to payer policies regarding physical therapist performance of EMG since Medicare or other payers may require advance credentials for reimbursement.
15. **Cindy Gensamer:** Ms. Gensamer asked the Section questions regarding whether physical therapist assistants can complete an environmental survey of a patient's home prior to discharging a client. **Reply:** You are correct that the physical therapist assistant may collect data from an environmental survey of the patient's home and the physical therapist will then interpret this data. A home assessment is the sole responsibility of the physical therapist. However, prior to the completion of a home assessment, the physical therapist assistant may go into the home, without patient involvement, to perform an environmental survey (architectural barriers, floor plan, etc.). If the patient is going into his/her home environment and his/her function in the home is being assessed, this assessment must be performed by a physical therapist. A physical therapist assistant may continue an established treatment plan of functional activities in the home or other non-clinical environment or may complete an environmental checklist once the patient assessment has been completed. It is the position of the Physical Therapy Section that documentation must clearly reflect who performed the service and when the services were provided. The Ohio Physical Therapy Practice Act does not dictate the format of documentation. The Physical Therapy Section recommends that you consult payer policies, facility or agency policies, or the American Physical Therapy Association for information on documentation. 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 name tag 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.
16. **Teresa Podracky, PT:** Ms. Podracky asked the Sections questions regarding physical therapist assistants attending interdisciplinary patient rounds and reporting to the team (PT/OT/SLP). **Reply: In response to your first question,** a physical therapist assistant (PTA) may gather and report on previously submitted documentation by the therapy team members. As long as the PTA is reporting in the way described, i.e.: the speech therapist has documented nectar thickened liquids; the occupational therapist has documented moderate assistance required with bathing; and the patient has been walking 50 feet as documented in the physical therapy notes. The Medicare regulations state that the interdisciplinary team meetings in inpatient rehab must focus on assessing the patient's progress toward the rehabilitation goals; considering possible resolutions to any problems that could impede progress toward the goals; reassessing the validity of the rehabilitation goals previously established; and monitoring and revising the treatment plan, as needed. Since rule 4755-27-03(C) of the Ohio Administrative Code requires that only a physical therapist may evaluate and re-evaluate a patient or establish and adjust the plan of care, a physical therapist assistant may

not represent the physical therapy discipline in the team meeting. Nothing would preclude the physical therapist assistant from attending or reporting in the meeting as long as the physical therapist is also present. **In response to your second question**, given the scenario stated, the physical therapist assistant is unable to perform an assessment. Your understanding of rules 4755-27-03 (E)(5) and 4755-27-02 (C) of the Administrative Code with respect to physical therapist assistant's abilities to gather and provide information to the physical therapist are correct. Any physical therapy related questions from the patient/nurse should be directed to the physical therapist or primary care physician on the interdisciplinary team. Ultimately, the physician involved in the particular patient's care should be notified of any change in functional status possibly indicating the need for physical therapy as it would be the physician who would likely be entering orders for physical therapy if needed in this setting.

### Joint Correspondence

- JB1. Vikki Spencer:** Ms. Spencer asked the Occupational and Physical Therapy Sections questions regarding requirements addressing the availability of a social worker in an outpatient occupational and physical therapy setting. **Reply:** Your questions relate to issues that are outside the Ohio Physical Therapy Practice Act. The Physical Therapy Section recommends that you contact the Ohio Chapter or Reimbursement Department of the American Physical Therapy Association. The Sections recommend that you contact the Counselor, Social Worker and Marriage and Family Therapist Board at [cswmft.info@cswb.ohio.gov](mailto:cswmft.info@cswb.ohio.gov) to address your questions regarding requirements for social workers in outpatient settings.
- JB2. Mary-Ann Plitt, PTA:** Ms. Plitt asked the Occupational and Physical Therapy Sections questions regarding requirements for occupational therapists being a clinical instructor and questions regarding physical therapist assistant's ability to carrying over continuing education to the next renewal period. **Reply:** It is unclear from your email if the student is a student occupational therapist or student occupational therapy assistant. It is also unclear if the student is completing Level I or Level II clinicals. The Section recommends that you review the Accreditation Council for Occupational Therapy Education (ACOTE) Standards regarding supervision of students. You may also want to contact the institution you will be receiving students from and contact the academic field work coordinator to review their guidelines for student placement. **In response to your second question**, any courses taken beyond the required number of continuing education credits cannot be utilized for the next approval period.
- JB3. Heather Jennings, PT, DPT:** Dr. Jennings asked the Athletic Trainers and Physical Therapy Sections questions regarding athletic trainers treating and billing in a physical therapy setting. **Reply:** Clinic-based athletic trainers may provide athletic training services upon physician referral for athletic training evaluation and treatment. The prescription by the referring medical practitioner must state the referral is for athletic training. Under an athletic training referral, the athletic trainer functions independently and is responsible for documentation. Pursuant to rule 4755-46-01 of the Administrative Code, unlicensed individuals functioning under the supervision of a licensed athletic trainer may perform designated routine tasks related to the operation of athletic training provided that the supervising athletic trainer is on-site to supervise the delegated tasks. If the patient receives a prescription for physical therapy and during care the physical therapist determines he/she may benefit from athletic training services, i.e. a patient's condition is an athletic injury, then the physical therapist may refer that particular patient to an athletic trainer. This transfer of care from a physical therapist must be documented in the patient's medical record. In addition, the athletic trainer must now obtain physician approval and prescription for an athletic training evaluation and treatment as described above. If this procedure is followed, the athletic trainer must perform an injury assessment and determine the athletic training plan of care. The patient is no longer under the care of the physical therapist. The physical therapist may also refer the patient to the care of the athletic trainer but have the patient still remain under the care of the physical therapist. In this non-transfer scenario, a physician prescription for athletic training is not required. Rule 4755-27-01 (C) of the Ohio Administrative Code defines "other licensed personnel" as "any person holding an Ohio license to practice as a health care practitioner in a profession other than physical therapy . . . who is working under the direct supervision of a physical therapist or physical therapist assistant, as delegated by the physical therapist, and is performing tasks and duties related to the delivery of physical therapy." When acting under the direction of a physical therapist, licensed athletic trainers are considered other licensed personnel. In accordance with rule 4755-27-04 of the Administrative Code, the supervising physical therapist or physical therapist assistant is accountable and responsible at all times for the direction of the actions of the persons supervised, including other licensed personnel. A physical therapist assistant can provide direct supervision of other licensed

personnel even if the physical therapist is not on-site but is available by telecommunication at all times and able to respond appropriately to the needs of the patient. However, only a physical therapist can determine that a patient may be delegated to other licensed personnel. Other licensed personnel cannot be assigned their own physical therapy caseload without the supervising physical therapist or physical therapist assistant having direct contact with each patient during each visit. It is the responsibility of the physical therapist to determine and document the extent of contact necessary to assure safe patient care. Pursuant to rule 4755-27-03 (F) of the Ohio Administrative Code, "Delegation of tasks related to the operation and delivery of physical therapy to other licensed personnel must be done in accordance with the scope of practice of the other licensed personnel's professional license, education and training, the level of competence as determined by the supervising physical therapist, and in consideration of the patient's overall needs and medical status." The patient contact by the delegating physical therapist or supervising physical therapist assistant may be to provide portions of treatment or to assess the patient's progress within the existing plan of care. When needed, only the physical therapist may make adjustments to the plan of care. Please refer to Medicare rules or other payer policies about reimbursement for treatment by other licensed personnel since some insurers do not cover services other than those provided by a physical therapist or physical therapist assistant. You may also get information from the Reimbursement Department or Ohio chapter of the APTA. It is the position of the Physical Therapy Section that when a patient presents with a prescription or referral for both physical therapy and athletic training, each professional shall complete their own evaluation. In addition, each professional should make every reasonable attempt to consult with the other and thereby coordinate the treatment program for the benefit of the patient. 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.

#### **Old Business**

##### **Review Other Jurisdictions' Regulations regarding the Use of Credentials when Conducting Health/Wellness Programs**

The Executive Director had no new information to report.

##### **Review Other Jurisdictions' Regulations regarding Offering Incentives for Referrals**

The Executive Director had no new information to report.

##### **Other Board's Rules on Advertising**

The Executive Director had no new information to report.

#### **New Business**

None

#### **Open Forum**

The Section gave a special recognition to Thomas Caldwell and Raymond Bilecky for their nine years of service on the Physical Therapy Section.

The Executive Director informed the Section that the 2016 FSBPT Annual Meeting will be held in Columbus, Ohio.

#### **Ohio Physical Therapy Association (OPTA) Report**

The Section reviewed OPTA's 2013 income and expense report related to the continuing education review process. Halle Runion reported that OPTA is in the final stages of revising the policy and procedures for continuing education approval. Ms. Runion also reported that the Scientific Symposium will be held on October 10, 2014. Carolyn Towner, gave a brief legislative report.

#### **Federation of State Boards for Physical Therapy (FSBPT) Report**

The Section discussed the motions for the upcoming FSBPT Annual Conference. Raymond Bilecky will be running for a seat on the FSBPT Nominating Committee.

**Items for Next Meeting**

- Use of Credentials when Conducting Health/Wellness Programs
- Rules Re-Numbering Project

**Next Meeting Date**

The next regular meeting date of the Physical Therapy Section is scheduled for Thursday, November 6, 2014.

**Adjournment**

Chad Miller moved that the meeting be adjourned. Lynn Busdeker seconded the motion. The motion carried. The meeting adjourned at 1:28 p.m.

Respectfully submitted,  
*Diane Moore*

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Ronald Kleinman, PT, Chair  
Ohio Occupational Therapy, Physical Therapy,  
and Athletic Trainers Board, PT Section

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Karen Holtgreffe, PT, Secretary  
Ohio Occupational Therapy, Physical Therapy,  
and Athletic Trainers Board, PT Section

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

**KH:jmr:dm**