



Ohio Occupational Therapy, Physical Therapy and Athletic Trainers Board

77 South High Street 16th Floor
Columbus Ohio 43215-6108

PHYSICAL THERAPY SECTION

Most Frequently Asked Question:

Unlicensed Personnel as “Second Pair of Hands”

Question: Under the supervision and delegation rules, can an on-the-job trained aide apply a hot pack or ultrasound to a patient while the therapist is concurrently documenting on that patient in the same area?

Response: The rule on delegation to unlicensed personnel is intended to limit the involvement of unlicensed personnel in direct patient care to assisting the physical therapist or physical therapist assistant as “a second pair of hands on the same patient.” For example, the unlicensed aide may assist a physical therapist or physical therapist assistant in transferring a patient who requires the support of two people for a safe transfer, or the unlicensed aide may guard a patient while the therapist steps back to assess the patient’s gait pattern. It is NOT intended that unlicensed personnel provide a component of physical therapy treatment to patient A while the physical therapist or physical therapist assistant treats patient B or performs other activities, e.g. documentation.

Online Applications for Initial Licensure

In 2005, the Board implemented online license renewals through the Ohio e-License Center. The opportunity to renew online and pay with a credit card has been well received by licensees, with over 90% of individuals electing to use the online system. In light of the success of online renewals, the Board recently developed a method for individuals seeking an initial Ohio license to use the Ohio e-License Center to apply online and pay with a credit card.

Individuals seeking to apply for their Ohio physical therapist or physical therapist assistant license online should go to the Ohio e-License Center (<https://license.ohio.gov>) and select the Application Site option.

Special Note:

Visit the Board website for new rules, Board Sponsored Continuing Education Powerpoint Presentations, and ongoing Frequently Asked Questions.

Inside this edition

Delegation to Other Licensed Personnel	Page 2
Use of the Title Doctor by a Physical Therapist	Page 3
Board Sponsored Continuing Education	Page 6
Updating Your Contact Information	Page 7
Licensee Census	Page 8

PHYSICAL THERAPY

Frequently Asked Questions

Delegation to Other Licensed Personnel

Question: Can athletic trainers carry their own caseloads under the physical therapy delegation rules?

Response: Other licensed personnel, which includes athletic trainers, 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 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.

Physical Therapist Supervision of Unlicensed Personnel in Non-PT Activities

Question: Can a physical therapist or physical therapist assistant develop the

plan for a restorative aide to provide maintenance therapy in a nursing home?

Response: Yes, a physical therapist or physical therapist assistant may provide administrative oversight of an unlicensed aide who is providing restorative or maintenance care in a nursing home after the termination of a physical therapy plan of care.

Physical Therapy Documentation by Other Licensed Personnel

Question: Does the rule about “other licensed personnel” documenting only “an accounting of the activities provided” mean that other licensed personnel, including an athletic trainer, can write only in the objective section of a SOAP note?

Response: The Physical Therapy Section does not dictate the format of clinical notes. As long as the documentation by other licensed personnel is restricted to an accounting of the activities provided, descriptions of those activities and the patient’s comments may be in various sections of the documentation. The remainder of the documentation is the responsibility of the supervising physical therapist or supervising physical therapist assistant.

The rule limiting the documentation by other licensed personnel to “an accounting of the activities provided” is intended to include patient comments during those activities and a description of the patient’s response or ability/inability to perform specific components of the program. However, any assessment of a patient’s progress must be documented by the physical therapist or physical therapist assistant, and prognosis or plan revision must be documented by the physical therapist.

Use of Title “Dr.” by a Physical Therapist

Question: May I introduce myself and sign my notes as Dr. John Doe?

Response: Whenever a physical therapist uses the title “Doctor,” it is good practice for the therapist to make certain that other health

PHYSICAL THERAPY

professionals and the public know that the individual is a physical therapist. For example, the therapist might say “Hello, my name is Dr. Doe, Physical Therapist.” When a signature is required, the appropriate sequence for credentials is the therapist’s name, followed by the regulatory designation (PT), followed by the degree. For example, an ID badge might read “Jane Doe, PT, DPT.” A physical therapist who does not hold a doctoral degree as described above may not use the title “Doctor.”

Manual Therapy by a Physical Therapist Assistant

Question: *Is a physical therapist assistant allowed to do joint mobilization in Ohio?*

Response: Ohio law does not specifically refer to whether or not a physical therapist assistant may utilize manual therapy techniques. The Ohio Physical Therapy Practice Act states that for any procedure delegated to an assistant, the assistant must be able to produce evidence of appropriate training and demonstrate knowledge and competency in any procedure, treatment, or service that the supervising physical therapist delegates to the physical therapist assistant. The supervising physical therapist may not delegate treatments, procedures, or services to a physical therapist assistant if the supervising physical therapist cannot demonstrate knowledge and competency in the procedure, even if the physical therapist assistant can demonstrate knowledge and competency in the procedure.

While the Physical Therapy Section understands the position of the American Physical Therapy Association related to providers of manual therapy, that position has not been codified into the scope of practice in the Ohio Physical Therapy Practice Act. It is the position of the Physical Therapy Section that there may be some cases in which a physical therapist could safely delegate several treatments of low-grade mobilization to a physical therapist assistant.

Since the need for re-examination prior to treatment needs to be a clinical judgment of the physical therapist on a case-by-case basis and

since re-examination cannot be delegated, it is the responsibility of the physical therapist to determine if treatments can be delegated within the parameters of the Ohio Physical Therapy Practice Act. The Physical Therapy Section would expect a physical therapist delegating any intervention to a physical therapist assistant or other licensed personnel to be able to provide the rationale for such delegation.

Electronic Signatures and Co-signatures

Question: *Our new computerized medical record doesn't have a way for me to co-sign our assistants' notes. Can they use the online documentation system?*

Response: Should your computer system or program not permit counter-signature by the physical therapist for notes entered by a physical therapist assistant, then you need to make arrangements with your vendor for the computer system to be revised or improved to permit such counter-signature. Should you not electronically be capable of dual signatures, you may enter a separate note within the same documentation system, referencing the date of the note(s) being reviewed with documentation referencing the review, noting agreement, and/or changes needed in the treatment plan or you may produce a hard paper copy that is co-signed by the physical therapist.

A handwritten or electronic signature is acceptable by a physical therapist or physical therapist assistant. When using an electronic signature, a hard copy of the individual's printed name and handwritten signature must be kept

PHYSICAL THERAPY

on file at the practice location, and the physical therapist or physical therapist assistant must assure that the electronic signature can be tracked to a unique logon code used only by that individual.

Discharge Summary and the Physical Therapist Assistant

Question: If the physical therapist documents a discharge evaluation and recommendations two days prior to the patient's discharge from skilled nursing, may a physical therapist assistant provide and document treatment the next day? Can that information from the physical therapist assistant constitute the discharge summary?

Response: 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.

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.

Practice Without a Referral

Question: If a physical therapist provides merely an interview/consultation to evaluate a patient/client/child and provides recommendations for follow up, is a physician referral required?

Response: Please refer to section 4755.481 of the Ohio Revised Code to understand how a physical therapist may evaluate a patient without a prescription.

The physical therapist shall, upon consent of the patient, inform the patient's physician, chiropractor, dentist, podiatrist, certified registered nurse anesthetist, clinical nurse specialist, certified nurse-midwife, or certified nurse practitioner of the evaluation not later than five business days after the evaluation is made. If the physical therapist determines that no substantial progress has been made with respect to that patient during the thirty-day period immediately following the date of the patient's initial visit with the physical therapist, the physical therapist shall consult with or refer the patient to one of the practitioners listed above unless either of the following applies:

- (a) The evaluation, treatment, or services are being provided for fitness, wellness, or prevention purposes.
- (b) The patient previously was diagnosed

PHYSICAL THERAPY

with chronic, neuromuscular, or developmental conditions and the evaluation, treatment, or services are being provided for problems or symptoms associated with one or more of those previously diagnosed conditions.

Medication Reconciliation

Question: *Is it legal for a physical therapist or physical therapist assistant to document the medications that a patient is taking?*

Response: There is nothing in the Physical Therapy Practice Act that prohibits a physical therapist or physical therapist assistant from performing a medication reconciliation that includes interviewing a patient about current medications, comparing those to the list of prescribed medications, and referring the lists to other practitioners or to computerized programs to identify potential 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.

Signatures & Documentation

The Physical Therapy Section is currently proposing rule language specifying how licensees and students should sign their names in documentation. Under the draft rule, all physical therapists must use the credential "PT" following their signature to indicate licensure as a physical therapist. The initials "MPT" and "DPT" indicate academic degrees that may be used in conjunction with the "PT" credential. When documenting in patient records, a licensed physical therapist may not only use "MPT" or "DPT" alone to indicate licensure, but may use "PT, MPT" or "PT, DPT".

The rule also states that licensed physical therapist assistants must use the credential "PTA" following their signature. Licensees should no longer use the designation of "LPTA" to indicate licensure status.

Students may use one of the following to indicate their student status: student physical therapist, student PT, or SPT. A student may not simply use the word "student" without indicating if the individual is a student physical therapist or student physical therapist assistant.

Proposed Rules Changes

Each year, the Physical Therapy Section reviews its rules to determine if any changes are needed to reflect current practice. The rule review process starts during the summer when the Section makes an initial determination of any potential changes. The Section then seeks feedback on the initial language before formally filing the changes. The Section plans to hold a public hearing on the proposed rules changes at its March 12, 2009 meeting, with the goal of new language going into effect on May 1, 2009.

The current proposed changes include adding remediation requirements for individuals who fail the NPTE more than three times (4755-23-03) and remediation requirements for endorsement and reinstatement applicants who have been out of practice for more than three years (4755-23-04 and 4755-23-10). Other proposed changes include language granting continuing education credit without an Ohio Approval Number for completion of an ABPTS specialty examination, the Hand Therapy Certification Commission certification examination, an APTA credentialed residency or fellowship program, or a practice review tool of the Federation of State Boards of Physical Therapy (4755-23-08). Pursuant to a change contained in H.B. 403, the Section is proposing new rule 4755-23-13 outlining licensure requirements for teaching physical therapy. The Section is also proposing language specifying how licensees and students should sign their name in patient documentation (4755-27-07).

PHYSICAL THERAPY

Information Access

6

Winter 2008

Join the Listserv

To allow for a quick and inexpensive mechanism to notify licensees and other interested parties of news and other regulatory issues, the Board established a listserv. To join the listserv, send an email to board@otptat.ohio.gov. In the body of the email, please state that you'd like to join the listserv and also indicate which list(s) you'd like to join. The Board maintains a separate list for each of the three professions.



Board Sponsored Continuing Education Course

In April 2008, the Ohio Occupational Therapy, Physical Therapy, and Athletic Trainers Board sponsored its first continuing education activity in Columbus. This free 2.0 contact hour session included a general overview of the agency's role and functions. Following the completion of the general information session, individuals attended breakout sessions that were profession specific. These breakout sessions addressed specific areas of concern, trends in violations/discipline, recent laws and rules changes, a group ethical exercise, and frequently asked questions.

The second session was held in December in Findlay. In 2009, the Board plans on holding two or three additional sessions at different locations in the state, including Akron in April.

Duty to Report

Many licensees are aware that the rules governing the practice require them to report to the Board any felony convictions or substance abuse issues that the licensee may have (rule 4755-27-06). However, licensees may not be aware that rule 4755-27-05 (A)(10) also requires them to report "any unprofessional, incompetent, or illegal behavior of a physical therapist or physical therapist assistant of which the licensee has knowledge." If you are aware of any potential violations of the Physical Therapy Practice Act, please download and submit the Complaint Form, which is available on the Board's website (<http://otptat.ohio.gov>).



Required Release of Personal Information

All of the information in an individual's licensure file, except the Social Security Number, is a public record under Ohio's broad public records law. Therefore, the Board must release the information to anyone who submits a public records request. Unfortunately, part of the requirement to hold an Ohio license is to provide current mailing and employment addresses, and current home and employment phone numbers. If a licensee fails to provide that information, the Board will not issue or renew a license. Although we share licensees' concerns about phone numbers and email addresses being released to any party requesting a listing of information, the Board is unable to remove mailing addresses or phone numbers from our licensure database.

The Board recommends that licensees contact their State Senator and State Representative and ask the legislature to change the public records laws. A change in Ohio's public records law would be the only way the Board could legally not release your address, phone number, or email address to a public records requestor. The Board also suggests that licensees register their phone number with the National Do Not Call Registry (<https://www.donotcall.gov/default.aspx>).

Enforcement Division

You can view the enforcement webpage at <http://otptat.ohio.gov>. On the left hand column select the link titled "Enforcement." From the Enforcement page you learn about the complaint and investigative process, review disciplinary actions taken by the Section, and obtain a complaint form.



License Renewal

Please note, all licenses issued for physical therapists must be renewed by January 31st of even-numbered years. All licenses issued for physical therapist assistants must be renewed by January 31st of odd-numbered years.

Renewing your license online is the preferred method. However, you can request a paper renewal by contacting the Board.

Common Online Renewal Questions

Why is my phone number on the receipt listed as (555)555-5555? This is a security feature built in the system. The phone numbers you entered are stored in the system.

What should I do if I am unable to update my business address? If your business name and address are not modifiable in the renewal module, then email your business address for the Board staff to update your file.

If you are having Browser issues: Check your browser to see if you have enabled the feature to accept cookies. You may need to update your web browser.

PHYSICAL THERAPY

Updating Your Contact Information

Did you know that failure to notify the Board of an address change won't just lead to a delay in receiving your renewal application from the board, but it is also a violation of the Ohio PT Practice Act. Rule 4755-23-07 of the Administrative Code requires all licensees to notify the board "in writing" of any change of name, place of business or employment, or mailing address within thirty days after the change."

Many licensees incorrectly assume that notifying the post office of a new address is sufficient. The post office will not forward a renewal application to a new address. It is relatively easy to notify the Board of your new information. You can fax the information to (614) 995-0816 or send an email to board@otptat.ohio.gov. If you have your UserID and password from your online renewal, you can even log into the Ohio e-License Center (<https://license.ohio.gov>) and select the Update Address Information option to make the appropriate changes.



PHYSICAL THERAPY

Information Access

8

Winter 2008

Verificaiton of License

The Board receives many requests for verification of an Ohio license to another state licensing board. To officially verify your Ohio license to another entity, you must submit a written request that includes the following information:

1. Your name;
2. Your current mailing address;
3. Your daytime phone number;
4. Your Ohio license number and/or your Social Security Number;
5. The mailing address of the entity requiring the verification; and
6. The verification fee.

You may also send the Board a copy of the other entity's verification request form provided that it includes your name and Ohio license number, and you include the verification fee and a daytime phone number.

The fee to officially verify your license to another entity is \$30 per request. Please make your money order, cashier's check, or business check payable to "Treasurer State of Ohio" in the exact amount. Personal check, credit cards, and/or cash will not be accepted. Verification processing takes approximately 3 business days.

Please send the request and verification fee to:

License Verification Request
Ohio OTPTAT Board
77 S. High Street, 16th Floor
Columbus, OH 43215-6108

Section Meetings

All Board/Section meetings are open to the public and anyone is welcome to attend. Please contact the Board at (614) 466-3774 or board@otptat.ohio.gov to verify the time and meeting location if you would like to attend. The planned 2009 meetings are scheduled for:

January 15

March 12

May 7

June 18

August 6

September 17

November 19



Licensee Census

As of December 11, 2008 there are:

Physical Therapists	7035
Physical Therapist Assitants	5251
Occupational Therapists	4121
Occupational Therapists in Escrow	223
Occupational Therapy Assistants	2694
Occupational Therapy Assistants in Escrow	132
Athletic Trainers	1832

PHYSICAL THERAPY

PT Board Member	City	Term Expires*	Term [^]
Robert Frampton, Chair	Findlay	2009	2nd
Donna Baker	Hamilton	2009	5th
Raymond Bilecky	Columbia Station	2011	2nd
Thomas Caldwell	Galena	2011	2nd
Sam Coppoletti	South Webster	2009	1st
Dale Deubler	Columbus	2011	1st
Mary Kay Eastman	Athens	2010	1st
Marilyn Mount	Cleveland Heights	2010	1st
Kimberly Payne	Columbus	2011	1st

*All terms expire on August 27 of the designated year.

[^]Pursuant to ORC 4755.01, Board members shall not serve for more than three (3) consecutive terms.

Are you Ready to Serve?

Have you ever wondered what goes on during a Physical Therapy Section meeting? Do you ever think that you might be able to contribute to the profession of physical therapy by serving as a member of the regulatory board?

The Governor is responsible for appointing all members of the Board. Members are appointed for three year terms and may serve for up to three consecutive terms. There are approximately seven meetings each year and members are reimbursed for their time and travel expenses.

To be eligible to serve on the Board, each applicant must hold a current Ohio physical therapist license and have been actively engaged in or associated with the practice of physical therapy in Ohio for at least five years immediately preceding the appointment.

If you are interested in submitting your name for consideration by the Governor, please download the application from the Boards and Commissions section of the Governor's website (<http://governor.ohio.gov>).

Contact the Board

Ohio OTPTAT Board, 77 South High Street, 16th Floor, Columbus, Ohio 43215-6108

Phone: (614) 466-3774 Fax: (614) 995-0816 Website: <http://otptat.ohio.gov> Email: board@otptat.ohio.gov