



Physical Therapy Board of California

STATE AND CONSUMER SERVICES AGENCY - GOVERNOR EDMUND G. BROWN JR.

Physical Therapy Board of California

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Agenda Item #10

Briefing Paper

Date: January 3, 2012

Prepared for: PTBC Members

Prepared by: Sara Takii PT, DPT, CI

Subject:

Review of the Federation of State Boards of Physical Therapy's DRAFT MODEL for SUPERVISED CLINICAL PRACTICE for the foreign educated physical therapy applicant for state licensure.

Purpose:

To perform an initial review of the draft model and offer comments to the FSBPT. Perform an initial review of the draft model as compared to the guidelines in California.

Background:

FSBPT:

During 2011, the Federation of State Boards of Physical Therapy developed a draft of guidelines, regarding clinical supervision of the foreign educated physical therapist prior to licensure. The FSBPT has asked states to review the draft and comment. I have included the draft for your review.

APTA:

During 2004, the American Physical Therapy Association developed standards for training Center Clinical Coordinators of Education (CCCE) and Clinical Instructors (CI), leading to APTA certification. The APTA has developed objectives, procedures, and methods of evaluating US students and foreign educated PT applicants. In addition, the APTA has established extensive requirements for the facility, as well as for the personnel involved in the Supervised Clinical Practice (SCP).

California Code of Regulations, Section 1398.26.5 (c), effective 1/8/2005

This section has also been included in this paper for your review. The section requires, effective January 1, 2008, the CCCE to be certified by the APTA, and, effective January 1, 2010, all CIs to be certified by the APTA. It also indicates California's reporting requirements for the SCP.

Statistics:

Recent statistics of the National Physical Therapy Examination (NPTE) California and US foreign educated pass rates have been included with this paper.

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3 **Analysis:**
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5 The draft model is divided into different sections.
6 “Prerequisites”, bullet #2:

7 I would recommend the addition of “US”; i.e., “to a US accredited entry-level program”.
8

9 I disagree the SCP should take place prior to the NPTE. California requires the test be
10 taken before commencing the SCP. I feel there are two major reasons for this:

- 11 1. States should be confident the applicant has the required academic knowledge,
12 before allowing the applicant to be treating patients during the SCP. The evaluation
13 of transcripts and foreign programs is a preliminary step in the process, but the
14 applicant needs to prove his/her level of knowledge by taking the NPTE. California’s
15 requirement of passing the NPTE prior to allowing the applicant to begin the SCP
16 further protects the public.
17
- 18 2. Statistically, a very low percentage of foreign educated applicants pass the NPTE. If
19 a state allows the SCP to be conducted prior to the exam, a large percentage of
20 applicants, who eventually do NOT pass the examination, would be working with the
21 public with the CI “in the facility”. I do not feel this protects the public.
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23 “Disclosure of Conflict of Interest”

24 I feel this area is well addressed.
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26

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28 **Action Requested:**
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30 I am hopeful the PTBC will forward the above comments to the FSBPT and any other comments
31 the members may offer, after perusal of the information provided.
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34 **Further Considerations:**
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36 In addition, I feel the Board needs to review the following issues, regarding the California
37 regulation cited above:
38

- 39 1. The regulation requires the CI to utilize the APTA’s form of evaluation, dating from 1997. The
40 APTA recently has made substantial changes to the form, as well as the method of evaluating
41 and recording the applicant’s progress during the SCP. These issues are included in the APTA’s
42 training of CCCEs and CIs.
43
- 44 2. I disagree with waiving time to be spent in a SCP, as related to passing the Law and Ethics
45 courses. Time in clinic is critical for the foreign educated. The Law and Ethics courses should be
46 required in their own right, but total clinical time should not be compromised. An applicant, who
47 is deficient in skills may need to complete a full 9 months of patient care under supervision, in
48 spite of the individual’s knowledge of the laws, etc.
49
- 50 3. Licensed practice in another state should not automatically take precedence over our
51 requirements for the SCP. Each state has different requirements for licensure. Time served in
52 INDEPENDENT practice of PT (per the code of regulations) does not equate to clinical practice
53 supervised by a CI for an extended period of time. During the credential review, prior to

1 licensure in any state, quality or existence of supervised clinical practice outside the US is very
2 difficult to prove. Did the applicant perform a SCP under a CI or CCCE in another state?
3

4 During my period of training for the CI certification, I frequently heard comments from other CIs
5 and instructors, regarding difficulties encountered with foreign educated applicants.
6

7 (A) Although the applicant may have passed a language proficiency test to allow
8 involvement in an SCP, elements of personal communication may be deficient.
9 Problems often arise when the applicant communicates with the patient, family,
10 physician, staff, etc. These problems require "time" to improve.
11

12 (B) Applicants frequently are not familiar with the US Health Care system and
13 associated patient care and reporting requirements.
14

15 (C) In many countries, physical therapists work on a "technician level". They are unaware
16 of the expansion of the US field of practice; e.g. diagnostics of impairment and
17 function, independent patient care program planning and development, etc.
18

19 These are three concerns which may become evident during an applicant's SCP. The applicant
20 may require more time to perfect the level of care. These concerns support the issue of
21 completing a full 9 months participating in an SCP.
22

23 Therefore, I feel further review of California's regulation is warranted in the future.