



Public comment as read by Karen Atlas, President of Animal Physical Therapy Coalition to the Physical Therapy Board of California at the November 19, 2025 Board meeting as it related to the draft Sunset Review Report to the Legislature.

November 19, 2025

President Brandon and distinguished members of the Board,

My name is Karen Atlas, a physical therapist licensed in California for nearly 30 years and President of the Animal Physical Therapy Coalition (APTC).

The APTC is a multi-stakeholder coalition of physical therapists, veterinarians, RVTs, working dog handlers—including law enforcement, search-and-rescue, and military—and consumers. We are supported by major animal welfare organizations, rescue groups, and veterinary general and specialty practices statewide. Our mission is to ensure safe, accessible, high-quality rehabilitation care for California's animals.

It is important to note that many veterinarians in California do not share the position of their trade association, the CVMA. While the CVMA supports a strictly hierarchical model requiring direct, onsite vet supervision for all rehabilitation, most veterinarians want the flexibility and choice to refer to and collaborate with qualified animal PTs under their indirect supervision. The APTC brings these collaborative voices together.

For more than two decades, California has struggled to regulate animal physical therapy and veterinary rehabilitation. Stakeholder's Task forces, decades of PT and Vet Board discussions, multiple legislative bill runs, and most recently, the Senate Business, Professions and Economic Development Committee hosted an Informational Hearing on this issue have attempted to clarify a practice that has long been delivered safely. Yet the regulatory gap persists—and has recently deepened.

In 2022, the Veterinary Medical Board required that an *unlicensed assistant*—the category assigned to licensed PTs treating animals—may only provide rehabilitation under direct, on site veterinary supervision. Previously, PTs could work under direct or indirect supervision. This shift pushed previously legal PT-owned practices out of compliance, reduced consumer access, and essentially created a monopoly on animal healthcare in an area where other non-vet licensees are qualified to perform. The deleterious regulations created unnecessary barriers for qualified professionals and limited access to needed rehabilitative care for animals.

Today, through the Sunset Review process, this Board can correct that. Specifically, page 83, item 59 of the draft report asks to describe any barriers to licensure and/or employment the board believes exists. The PTBC says it has not identified any barriers to licensure or employment.

We respectfully request that the Board include Animal Physical Therapy in its Sunset Review Report to address these specific barriers to practice and recommend a statutory amendment authorizing qualified physical therapists to treat animals under veterinary clearance and supervision.

This request is fully supported by national regulatory leaders. The Federation of State Boards of Physical Therapy (FSBPT) recognizes that PTs may work with animals when appropriately trained, and released Model Regulations in 2025 that provide adoptable language for safe, interprofessional collaboration.

Here in California, the PT Practice Act applies only to human patients, even though FSBPT defines animal PT as the practice of physical therapy. And that is where the current Sunset draft lacks inclusion. Including this issue into the Sunset Report could be appropriate in two areas within the current draft document—either within item 59 on page 83 or under Section 10 in New Issues not previously discussed in this report.

We respectfully request that the Board specifically include the following into its Sunset Review Report:

- 1. Acknowledge Animal Physical Therapy as a growing practice area needing regulatory clarity.**
- 2. Recommend statutory authority for this Board to regulate qualified PTs treating animals with defined training and veterinary oversight. This would provide the authority to remedy those barriers to licensure to allow for the safe practice for qualified licensees.**
- 3. Endorse FSBPT's 2025 Model Regulations as the framework for California.**

These steps align California with national best practices and preserve veterinarian authority within a workable, collaborative model.

Thank you for your time and consideration.

Karen Atlas

Public comment as read by Dr. Jenny Moe, Treasurer of the Animal Physical Therapy Coalition (and Vice President of the American Physical Therapy Association's Animal Physical Therapy Group) to the Physical Therapy Board of California at the November 19, 2025 Board meeting as it related to the draft Sunset Review Report to the Legislature.

Good morning President Brandon and members of the Board, and thank you for the opportunity to speak today. My name is Dr. Jenny Moe, and I am speaking on behalf of the Animal Physical Therapy Coalition.

Today, I respectfully request that the Board include Animal Physical Therapy within its Sunset Review Report, and recommend that the Legislature provide this Board with explicit statutory authority to regulate animal physical therapy performed by qualified physical therapists under the supervision and clearance of licensed veterinarians.

This request is simple, reasonable, and overdue. Most importantly, it provides **transparency and accountability** for the public. Pet owners deserve to know that their providers are licensed, trained, and operating within a clear regulatory framework.

This is not merely a professional issue—it is an access-to-care issue for Californians.

I have been a licensed PT in California for nearly 23 years and certified to work with animals for 15. I have held the office of vice president of the APTA Animal Physical Therapy Special Interest Group since 2020. I initially worked in a specialty veterinary practice alongside brilliant and supportive surgeons, neurologists, and other specialists. Collaboration on cases for the benefit of the patient was welcome and easy. Veterinarians in the community quickly found value in the expertise of a physical therapist for their patients. I stayed for over 10 years, but left in search of my own practice. This was unattainable in California, so I moved to Tahoe.

I opened my own practice in Stateline, Nevada, holding licenses from both the PT and veterinary board. Business should have been easy due to the Nevada practice guidelines, but was complicated by veterinarians' inability in South Lake Tahoe to refer directly to me. Patients instead had to be evaluated and referred by a Nevada veterinarian, often doubling the cost for clients and delaying access to services.

I moved back to San Francisco and have since been unable to freely practice animal physical therapy unless I work for a veterinarian. Clients openly express the need for home-based services, but PTs cannot help them under the current veterinary practice act's language. There is a gap in rehabilitation services that could be uniquely filled by physical therapists. Our expertise in neurological and orthopedic rehabilitation, manual therapy, and so much more is complimentary to the services rehabilitation veterinarians provide.

The average wait time to get a rehab evaluation is 3 months in the San Francisco Bay Area. This excessive wait may be detrimental to animals and their caregivers. The condition or disability may

worsen, which could lead to declining quality of life and ability of the family to care for a disabled pet. It is physically and emotionally taxing for caregivers to juggle a struggling pet with family, work, and expenses. At the worst, animals may face a shortened life span due to lack of access to rehabilitation services. Veterinarians who want their patients to get better cannot find available providers, and clients to search high and low to find help. They may turn to online resources which may not provide accurate or safe recommendations for their pet's condition.

From my experience, veterinarians very much want to collaborate with appropriately certified PTs such as myself. I have heard time and again how much knowledge and expertise we bring to the field of animal rehabilitation, and how much their patients benefit from our services.

California can—and should—lead in protecting both consumers and animals.

The APTC is ready to support the Board with model language, training outlines, and national comparisons at any time. We deeply value your leadership and your thoughtful consideration of this important public protection issue.

Thank you for your time and your service.

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PT Board Sunset Review Meeting – Animal Physical Therapy Comments

Physical therapists are experts in rehabilitation for movement-related dysfunctions. Animals often develop injuries and medical conditions that can be effectively addressed with many of the same techniques used in human physical therapy. Physical therapists with advanced training in animal rehabilitation are among the most qualified professionals to provide this care.

In many jurisdictions, both the veterinary and physical therapy board practice acts and regulations work together to establish and enforce requirements for the practice of animal physical therapy, demonstrating that a shared regulatory framework can effectively protect animals while expanding access to care.

A framework in which veterinarians determine the appropriate level of supervision for each case appropriately balances professional expertise, liability considerations, and the veterinarian's clinical judgment. However, clear legislative action is needed to formally establish this collaborative model, ensure consistent standards, and provide clarity for all professionals involved.

Allowing physical therapists to participate in animal rehabilitation under a clear, collaborative legislative framework would provide the appropriate level of oversight necessary to ensure safe treatment of animals, just as has been performed in other states. It very effectively increases access to care for more animals needing these essential and specialized services. Improving veterinary and physical therapy collaboration will benefit both professions, but most importantly, will benefit the people and animals of California.

Stacy DeFoe
Executive Director
California Physical Therapy Association