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February 26, 2021

Honorable Zack Fields, Co-Chair and Honorable Ivy Spinholz, Co-Chair  
Alaska House Labor & Commerce Committee  
Alaska State Capitol  
Juneau, AK 99801

Cc: Jennifer Lynn Carlson, Chair Alaska State Physical Therapy & Occupational Therapy Board

RE: Support of HB 99

Dear Representatives Fields and Spinholz,

Thank you for the opportunity to write in support of HB99, which makes much needed updates to the statute impacting physical therapists and physical therapist assistants. I am writing on behalf of the Federation of State Boards of Physical Therapy (FSBPT), of which, the Alaska State Physical Therapy & Occupational Therapy Board is a member. FSBPT is an organization made up of the 53 physical therapy licensing jurisdictions within the United States whose mission is to protect the public by providing service and leadership that promote safe and competent physical therapy practice. FSBPT is the owner and developer of the National Physical Therapy Examination (NPTE).

The proposed practice act updates in HB99 include:

- Change in the board composition
- Change term physical therapy assistants to physical therapist assistants
- Licensure qualifications for physical therapists and physical therapist assistants
- Licensure qualifications for foreign educated physical therapists and physical therapist assistants

The proposed board composition will better reflect the licensees the board serves. Physical therapist assistant is the proper term accepted by both the American Physical Therapy Association and FSBPT. The change in the language to licensure qualifications provides improved clarity in the statute.

- (3) pass an examination recognized by the board that measures the competence of the applicant in the English language if the applicant's physical therapist or physical therapist assistant education program was not taught in English;
- (4) have met applicable requirements under 8 U.S.C. 1101 - 1503 (Immigration and Nationality Act) [THE FEDERAL MMIGRATION AND NATIONALITY ACT (8 U.S.C. 1101 ET SEQ.)], unless a United States citizen;

To be eligible to sit for the NPTE, FSBPT also requires demonstration of English proficiency. However, FSBPT's requirements are more stringent than federal requirements. An individual may meet the federal guidelines but still not be eligible to take the NPTE. FSBPT recommends replacing the current bill text with the following language from the Model Practice Act for Physical Therapy (MPA), the preeminent standard for revising and

modernizing physical therapy practice acts, to allow the Board greater flexibility to determine how English proficiency should be demonstrated:

3. Pass a board-approved English proficiency examination as required by the board as further established by rule.

The rules can then be more specific to the requirements:

English Language Proficiency Requirement

- (a) The approved English proficiency examination is the most recent Test of English as a Foreign Language (TOEFL);
- (b) The TOEFL minimum passing score is twenty-two (22) in writing; twenty-four (24) in speaking, twenty-two (22) in reading, and twenty-one (21) in listening. The minimum passing scores must be acquired in one test administration;
- (c) Applicants who graduated from an educational program accredited by CAPTE or a college, university, or professional training school located in Australia, Canada (except Quebec), Ireland, New Zealand, the United Kingdom, or the United States are exempt from the English proficiency requirement.

Per the Board's request, the FSBPT is happy to provide testimony via telephone during public testimony in support of HB99. These changes are necessary to update the physical therapy practice act in Alaska. Again thank you for the opportunity to comment.

Sincerely,



Nancy Kirsch, PT, DPT, PhD, FAPTA  
President  
Federation of State Boards of Physical Therapy

February 27, 2021

ATTN: House Labor and Commerce Committee  
RE: House Bill 99

I am writing in support of HB99: "An Act relating to the State Physical Therapy and Occupational Therapy Board; relating to the practice of physical therapy; and relating to the practice of occupational therapy." This bill provides many needed changes to the existing statutes and will bring Alaska in line with national standards and terminology.

Given that entry-level degrees for both physical and occupational therapy are doctorates, and that neither physical or occupational therapists are required to practice under a physician's supervision, it is appropriate to remove the physician from the Licensing Board and to replace that seat with another representative of occupational therapy.

This bill intends to remove some barriers to practice for people wishing to practice in Alaska, particularly graduates of foreign programs taught in English. In addition, giving the State Licensing Board more jurisdictional punitive power over licensees is a change that will give the public of Alaska an added layer of security and safety.

In all, I believe that the proposed changes will bring the terminology of the statutes up to modern language and ensure that those practicing physical therapy and occupational therapy will meet the standards that have been set forth.

Thanks again for your time and support of providing the public with a clear message on the qualifications of their providers.

Sincerely,



Meera Parekh, PT, DPT, OCS  
Southcentral Foundation, Physical Therapist  
Alaska Chapter of the American Physical Therapy  
Association, Secretary  
Mparekh428@gmail.com

Juliana Ament  
PO Box 57297 North Pole AK 99705  
907-978-5753  
jament@northpolept.com

**ATTN: House Labor and Commerce Committee**

RE: House Bill 99

February 28, 2021

Dear Committee members,

I am a physical therapist practicing within a private practice in North Pole Alaska. I am writing to support HB 99: "An act relating to the State Physical Therapy and Occupational Therapy Board; relating to the practice of physical therapy; and relating to the practice of occupational therapy."

This bill provides changes needed to existing statutes to bring our practice act in line with current terminology and national standards.

Providing a seat on the licensing board to another occupational therapy representative is appropriate to allow the licensing board to better represent the professions to the public. Additionally, allowing the State License Board more punitive power will provide more security for the public.

Otherwise, it is beneficial in transparent communication to modernize language to correctly describe the profession of assistants. Finally, removing the requirement for those foreign educated in the English language to take an English proficiency examination removes an unnecessary hurdle to licensure valuable professionals.

Thank you for your time and support of modernizing the language of our communicative document.

Sincerely,

**Juliana Ament. PT, DPT, MOMT, OCS**

## LeeAnne Carrothers, PT, PhD

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House Labor and Commerce Committee  
RE: House Bill 99

March 1, 2021

Representatives Fields and Spinholz, Co-chairs

I am writing in support of HP 99: "An Act relating to the State Physical Therapy and Occupational Therapy Board; relating to the practice of physical therapy; and relating to the practice of occupational therapy." This bill provides many needed changes to the existing statutes and will bring Alaska in line with national standards and terminology. Again, thank you very much for your hard work with us on this bill during a very busy legislative session.

I am particularly happy to see proposed changes to language referring to Physical Therapist Assistants. Currently, Alaskan Physical Therapist Assistants are referred to as Physical Therapy Assistants, a term that has not been used by the American Physical Therapy Association since 1969. Further, given that entry-level degrees for both Physical and Occupational Therapy are doctorates, and that neither Physical or Occupational Therapists are required to practice under a physician's supervision, it is appropriate to remove the physician from the Licensing Board and to replace that seat with another representative of Occupational Therapy.

In all, I believe that the proposed changes will not only bring the language in the statutes up to date, but will remove some barriers to practice for people wishing to practice in Alaska, particularly graduates of foreign programs taught in English. I am grateful for your sponsorship and support of this bill, and thank you for your work on behalf of Alaska's citizens.

Sincerely,

*LeeAnne Carrothers*

LeeAnne Carrothers, PT, PhD  
APTA Alaska Government Affairs Liaison  
[leeannecarrothers@aptaalaska.org](mailto:leeannecarrothers@aptaalaska.org)

CC: Alec Kay APTA Alaska President



THE STATE  
of **ALASKA**  
GOVERNOR MIKE DUNLEAVY

**Department of Commerce,  
Community  
and Economic Development**

State Physical Therapy and  
Occupational Therapy Board

PO Box 110806  
Juneau, Alaska 99811-0806  
Main: 907.465.2580  
Toll free FAX: 907.465.2674

March 1, 2021

The Honorable Representative Matt Claman  
Alaska State Legislature  
State Capitol Room 118  
Juneau AK, 99801

Dear Representative Claman,

The Alaska State Board of Physical Therapy and Occupational Therapy would like to thank you for introducing HB99. These changes have been a priority for the Board for many years, and will help the Board in our work to protect the public. The Board is in support of this legislation.

This bill provides for amendments to the governing statutes for physical therapy and occupational therapy professionals practicing or seeking licensure in Alaska. The amendments are primarily technical in nature and are designed to bring Alaska statutes in line with current national standards and terminology. This includes removal of organizations that no longer accredit the professional degree programs. HB99 recognizes that both professions have grown since these statutes were first enacted and are independent of physician supervision. This bill better prepares the Board as we move into the future.

The State Physical Therapy and Occupational Therapy Board members are in support of HB 99, and believes these statutory changes are in the best interests of Alaskans.

Sincerely,

*Keith Poorbaugh*

Keith Poorbaugh,  
Physical Therapist  
Board Member

CC: House and Labor and Commerce Committee  
Director Sara Chambers  
Deputy Director Sharon Walsh  
Glenn Hoskinson, Special Assistant to the Commissioner II  
Alaska State Physical Therapy Association

# ***Elite Rehabilitation***

## ***PHYSICAL THERAPY AND SPORTS HEALTH***

**Rebecca Byerley, PT, DPT, CAPP, CFT**  
**Physical Therapist**

**104 S. Binkley, Suite C**  
**Soldotna, AK 99669**  
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**House Labor and Commerce Committee**  
**Alaska State Capitol**  
**Juneau, AK 99801**

**March 2, 2021**  
**Regarding: HB 99**

**This letter is of support of HB99 ‘An Act relating to the State Physical Therapy and Occupational Therapy Board; relating to the practice of physical therapy; and relating to the practice of occupational therapy.’ This bill provides the timely changes to our existing professional statutes to bring Alaska in line with national standards and terminology.**

**In addition, Physical Therapy (PT) and Occupational Therapy (OT) are doctoring professions by which graduates have an entry-level doctorate degree. The timing is right to remove the physician from the Licensing Board. It is an antiquated model and time to replace the outgoing physician member with an OT board member creating equal representation between the two professions (PT and OT). The PT, PTA, OT, and OTA members on the Physical Therapy and Occupational Therapy Licensing Board will continue to ensure Board actions are carried out in an appropriate manner to ensure security and safety to the public of Alaska.**

**It is time to bring the antiquated language of the ‘Act’ into the 21<sup>st</sup> Century and to make changes as pertinent for the current Practice of PT and OT in Alaska and in providing the necessary security and safety for the public of Alaska.**

**Thank you for your consideration in supporting HB 99.**

**Respectfully,**

***Rebecca Byerley, PT, DPT***

**Rebecca Byerley, PT, DPT, CAPP, CFT**  
**Physical Therapy Private Practice Owner (Soldotna)**  
**Past Chair, Kenai Peninsula Therapist Group**  
**Past President, Alaska Physical Therapy Association**



ATTN: House Labor and Commerce Committee  
RE: House Bill 99

The Alaska Physical Therapy Association supports HB99: "An Act relating to the State Physical Therapy and Occupational Therapy Board; relating to the practice of physical therapy; and relating to the practice of occupational therapy." This association represents 450 physical therapist and physical therapist assistants in the state of Alaska. This bill provides many needed changes to the existing statutes and will bring Alaska in line with national standards and terminology.

Given that entry-level degrees for both physical and occupational therapy are doctorates, and that neither physical or occupational therapists are required to practice under a physician's supervision, it is appropriate to remove the physician from the Licensing Board and to replace that seat with another representative of occupational therapy.

Giving the State Licensing Board more jurisdictional punitive power over licensees is a change that will give the public of Alaska an added layer of security and safety.

In all, we believe that the proposed changes will not only bring the language in the statutes up to modern language, but will remove some barriers to practice for people wishing to practice in Alaska, particularly graduates of foreign programs taught in English.

Thanks again for your time and support of providing the public with a clear message on the qualifications of their providers.

Sincerely,

Alec Kay, PT, DMT, ATC, FAAOMPT  
Alaska Chapter of the American Physical Therapy Association, president  
[aleckay@akapta.org](mailto:aleckay@akapta.org)

ATTN: House Labor and Commerce Committee  
RE: House Bill 99

To Whom It May Concern,

I, Joseph Einhorn an Emergency Medicine Physician at Alaska Regional Hospital in Anchorage, would like to voice my support of HB99: "An Act relating to the State Physical Therapy and Occupational Therapy Board; relating to the practice of physical therapy; and relating to the practice of occupational therapy."

In my professional career, I have had the opportunity to work and collaborate with both physical and occupational therapists. I find the profession as a whole to provide high-quality care that is based on scientific principles. I regularly place the well-being of many patients in their hands.

I feel as though removing a physician from the Licensing Board is appropriate considering the level of education required of both physical and occupational therapists. The Licensing Board as revised in this bill is fully capable of governing the process and approval of professionals in their field.

I am also pleased that this bill requires professionals graduate from nationally accredited institution that require supervised field work. This gives me more confidence that this profession can operate independently, yet continue to collaborate with other medical professionals.

Thank you for your time and consideration of this bill.

Sincerely,



Joseph Einhorn, MD  
Alaska Regional Hospital  
[Jeinhorn14@gmail.com](mailto:Jeinhorn14@gmail.com)

ATTN: House Labor and Commerce Committee  
RE: House Bill 99

My name is Leah Einhorn, and I am a practicing Doctor of Physical Therapy in Anchorage, Alaska. I have been practicing for over ten years, almost four of which have been in Alaska. I am in wholehearted agreement with HB99: "An Act relating to the State Physical Therapy and Occupational Therapy Board; relating to the practice of physical therapy; and relating to the practice of occupational therapy."

Winston Churchill famously said, "to improve is to change, to be perfect is to change often." The time is long overdue for an update of our legislature in order for meaningful improvements to be made in our profession in the state of Alaska. This bill provides many necessary changes to modernize terminology related to the profession, and update regulations to be consistent with national guidelines.

While physical and occupational therapists routinely collaborate with physicians on matters related to patient care, it is no longer necessary to include a physician on the Licensing Board, as physical and occupational therapists receive doctoral degrees. It would be a better use of resources and more specific to our profession to include an additional occupational therapist. This will not change the relationship our profession and we as individuals have with physicians. We will continue to work alongside them, and seek their guidance and expertise when necessary.

This bill also elevates the standards of care for our profession by requiring that professionals be graduates of a nationally accredited institution which includes supervised field work. These are to be approved by our Licensing Board. It also provides updated guidelines for the transition of foreign-trained therapists that are reasonable and more efficient than the current standards.

Thank you for your consideration and support in making necessary updates to antiquated legislature.

Sincerely,



Leah Einhorn, PT, DPT, OCS, FAAOMPT  
[leah@unitedpt.com](mailto:leah@unitedpt.com)