

February 11, 2020

Honorable Cathy Giessel  
Senate President  
Alaska State Senate  
Juneau, Alaska

**SUBJECT: Opposition to Senate Bill 47, Sec. 11. AS 08.84.130(a): Including “Physiotherapist” as a synonym for Physical Therapist and Becoming Subject to Criminal Prosecution for use by any person other than a Licensed Physical Therapist in Alaska.**

Senator Giessel:

The Alaska Board of Chiropractic Examiners (ABOCE) has just recently become aware of wording in Senate Bill 47, Sec. 11. AS 08.84.130(a), currently in committee with Senate Finance, where the term “Physiotherapist” is being proposed as a legal synonym for Physical Therapist and imposing criminal penalty on any individual or entity that utilizes this term to identify themselves or their practice but is not a licensed Physical Therapist. The ABOCE is opposed to this specific word being included in this Bill.

As currently proposed:

\* **Sec. 11. AS 08.84.130(a)** is amended to read:

(a) A person not licensed as a physical therapist, or whose license is suspended or revoked [,] or **has** [WHOSE LICENSE IS] lapsed, who uses in connection with the person's name the words or letters **"P.T.," "Physical Therapist," "Physiotherapist," "L.P.T.,"** [,] "Licensed Physical Therapist," or other letters, words, or insignia indicating or implying that the person is a licensed physical therapist, or who, in any way, orally [,] or in writing, directly or by implication, holds out as a licensed physical therapist, is guilty of a class B misdemeanor.

We understand the likely intent of this proposal is to resolve an ongoing confusion at the international level of what physical therapists (American terminology) call themselves compared to physical rehabilitation specialists choosing the term of physiotherapists in England, Canada, Australia and other nations. Relatively speaking, these are synonymous terms. We can therefore reasonably state that any professional within the scope of their practice using physiotherapies is a physiotherapist.

Physiotherapy(ies) also is a term and practice used by other healthcare professions that are every bit as well-trained in the use and administration of physiotherapies as Physical Therapists, including medical and osteopathic physicians, nurses, athletic trainers, and chiropractic physicians. Psychiatrists (medical doctors specializing in physical rehabilitation and physiotherapies) and increasingly Chiropractic Physicians—because they have the privilege of

diagnosis-- often oversee rehabilitation facilities for large surgical centers, hospitals--even the U.S. Olympic Training Center health care is overseen by a chiropractic physician--overseeing the work of physical therapists, and various other health care professionals.

In order to maintain national accreditation, all chiropractic schools are required to teach principles and practices of physiotherapy in addition to anatomy, physiology, neurology, clinical diagnosis, etc. The National Board of Chiropractic Examiners oversees standardized national Board Exams as a prerequisite for licensure of chiropractic physicians in all states. In order to sit for the Physiotherapies board exam, which is required for licensure in Alaska, a chiropractic student must pass a minimum 120 hours of graduate training in physiotherapies [**physiological therapeutics—AS 08.20.900(12)**], as well as pass the National Board of Chiropractic Examiners Physiotherapy exam. As stated on the NBCE website “Physiotherapy assesses passive adjunctive procedures, including thermotherapy, electrotherapy, mechanotherapy, and `endurance training, muscle rehabilitation, neuromuscular rehabilitation, and disorder-specific rehabilitation.”

By definition, the word **physio** is a combining form representing the word physical or **physiological** in compound words, such as in physiotherapy. **Therapeutics** is the branch of medicine concerned with treatment of a disease and is synonymous with the word Therapy. Physiologic Therapeutics was the common vernacular at the end of the 18<sup>th</sup> century for the modern word **physiotherapy**.

Physiotherapies, or Physiologic Therapeutics is defined in Alaska Statute 08.20.900(12) as the therapeutic application of forces that induce a physiologic response and use or allow the natural processes of the body to return to a more normal state of health; physiological therapeutics encompasses the diagnosis and treatment of disorders of the body, utilizing (A) manipulation; (B) the natural healing forces associated with air, cold, heat, electricity, exercise, light, massage, water, nutrition, sound, rest and posture; (C) thermotherapy, cryotherapy, high frequency currents, low frequency currents, interferential currents, hydrotherapy, exercise therapy, rehabilitative therapy, meridian therapy, vibratory therapy, traction and stretching, bracing and supports, trigger point therapy, and other forms of therapy.

Alaska Statute 08.84.190(6) is the Physical Therapy definition of “physical therapy.” No definition of **physiotherapy** is found in Alaska Statute 08.84 or Title 12 Alaska Administrative Code Sec. 54 in relation to physical therapy. In fact, the word physiotherapy(ies)(ist) is nowhere to be found in Alaska Law except for the rudimentary form in chiropractic statute, clearly outlining the practice of physiotherapy as a **Chiropractic term or practice**. I find it interesting that a profession without a single reference to the word wishes sole use and access to the term.

The definition of physiotherapy, or physiologic therapeutics, is an integral part of Chiropractic Core Methodology in Alaska. We even define the term in our statute. In addition to Examination, Diagnosis and Patient Education, Physiotherapy is as integral to chiropractic practice as to physical therapy practice. The first step of claiming exclusion to a process or procedure is claiming exclusion to its title.

It appears this amendment to AS 08.84.130(a) in Senate Bill 47 is a dangerous overstep by the Alaska Board of Physical and Occupational Therapists utilizing exclusionary wording to begin a process to exclusionary practice of physiotherapies in professional practice. Health care professionals of all disciplines utilize the same procedures, techniques, tests, devices, etc. for the optimal treatment of their respective patients. This is a blatant power grab in an ongoing Turf war.

The legal professional term Physical Therapist is recognized in Alaska as a unique profession of health care and entails the use of physical therapies as the methodology of practice. A Chiropractic Physician under the statutory definition, utilizes physiological therapeutics or physiotherapies as fundamental methodology in chiropractic practice.

In summary, the Alaska Board of Chiropractic Examiners is staunchly opposed to the inclusion of the title "Physiotherapist" as exclusive privilege of the physical therapy community and insists the term "physiotherapist" be removed from Senate Bill 47's proposing re-write of AS 08.84.139(a).

Representing the Alaska Board of Chiropractic Examiners by Unanimous Motion on February 11, 2020.

Respectfully,

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Chiropractic Sports Physician  
Chair, Alaska Board of Chiropractic Examiners