



## Alaska Chiropractic Society

February 13, 2020

The Honorable Senator Cathy Giessel  
Alaska State Legislature  
State Capitol Room 111  
Juneau, AK 99801

Re: SB 47

Dear Senator Giessel,

The Alaska Chiropractic Society (ACS) applauds your efforts to update the statutes establishing physical therapists and physical therapy assistants in order to modernize their board, educational standards, and terminology through SB 47. However, our association is concerned about one provision in the bill - the addition of the title "*Physiotherapist*" for a physical therapist found in section 11 (see below).

ACS is concerned that granting the exclusive use of this title (with penalty) to physical therapists may translate to term protection of the word "physiotherapy". Term protection would prohibit all other healthcare providers from using the word "physiotherapy" to advertise services provided in their clinics/offices, much like how the AK Board of Physical Therapy and Occupational Therapy currently limits providers' use of the term "physical therapy" in advertising unless there is a licensed physical therapist on staff.

The CPT code set used to bill physical therapy services is not exclusive to any provider type. Many healthcare providers – ANP, DC, DO, LMT, MD, PA, PT – appropriately provide and bill for these type of services both within their state scopes of practice and insurance billing practices.

Doctors of Chiropractic must provide proof of board certification in physiotherapy to become licensed in Alaska and "physiotherapy" is an approved subject for continuing education under regulation. Because chiropractors, and others, already offer such treatment, granting exclusive use of the term "physiotherapy" will create conflict and confusion in the law that can reasonably be avoided.

We request that you amend the language in the bill to avoid such conflict. Specifically, we respectfully request that you either strike the term "Physiotherapist", or add language in section 11, or where appropriate, to clarify that healthcare providers who already provide physiotherapy, based on education and licensure, are not subject to the penalties established in Section 11 (a).

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

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

Again, we thank you for your efforts in SB 47, and recognize and appreciate your attention to a wide spectrum of health care issues as a state senator. I hope I have clearly explained our concerns. Please feel free to contact me, or our lobbyist in Juneau, Jeff Logan, if you have questions.

Sincerely,



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