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Cynthia Kunkel Scott, PT, PhD, MBA
607 Wendover Way
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Dear Dr. Scott,

Thank you for your inquiry about the interpretation of the *Standards of Practice for Physical Therapy* (HOD S06-10-09-06) ("Standards"), a document adopted by the APTA House of Delegates and last amended June 2013. The question addresses whether the Standards say that a physical therapist assistant ("PTA") shall not provide administrative direction of a physical therapy service. A key source of interpretation concerning the Standards are the *Criteria for Standards of Practice for Physical Therapy* (BOD S01-14-01-01) ("Criteria"), which were adopted by the APTA Board of Directors and last amended January 2014.

APTA's internal legal interpretation of the Standards and the accompanying Criteria is summarized below:

The House adopted the Standards as a statement of "conditions and performances that are essential for provision of high-quality professional service to society." (Standards, Preamble). Standards, Part II is headed "Administration of the Physical Therapy Service." In part it provides:

D. Administration

A physical therapist is responsible for the direction of the physical therapy service.

E. Fiscal Management

The director of the physical therapy service, in consultation with physical therapy staff and appropriate administrative personnel, participates in the planning for [sic] and allocation of resources. Fiscal planning and management of the service is based on sound accounting principles.

The Board's discussion of these provisions is in the excerpt from the Criteria set forth in the Annex below. In ordinary English, "management" and "administration" are synonyms. The ordinary meaning of "fiscal" relates to money or financial matters. In context, the phrase "is responsible" undoubtedly means "should (or must) be responsible," and "participates" undoubtedly means "should (or must) participate."

If Standards, II (D) were read in isolation it could support the view that a PT should (must) be responsible for all aspects of the administration of a physical therapy service. However, the various provisions in a document such as the Standards should be read in conjunction with the document's other provisions. In particular, Standards, II (D) should be read in conjunction with Standards, II (E). This approach reveals that the Standards differentiate between

"administration" (unqualified) and "fiscal management." As to "administration," the first activity, a PT "is responsible"—language suggesting that the PT shall be the decision-maker. However, as to "fiscal management," the second activity, the PT merely "participates" in "planning" and in the "allocation" of resources—language suggesting that the PT need not be the decision-maker.

Therefore, the Standards appear to say that a PT need not be the decision-maker with regard to the financial aspects of running a physical therapy service, but a PT should (or must) be the decision-maker with regard to the nonfinancial aspects. The Board's discussion of "fiscal management" supports this interpretation, because it follows the ordinary meaning of "fiscal." That is, terms relating to monetary/financial matters appear in 5 of the 6 bullets interpreting Standards, II (E); ie, "budget," "financial information," "cost-effective," "fee schedule," and "pro bono services." In contrast, explicit references to monetary/financial matters are absent from the 8 bullets in the Board's discussion of "administration."

ANNEX

CRITERIA FOR STANDARDS OF PRACTICE FOR PHYSICAL THERAPY (BOD S01-14-01-01)

D. Administration

A physical therapist is responsible for the direction of the physical therapy service.

The physical therapist responsible for the direction of the physical therapy service:

- *Ensures compliance with local, state, and federal requirements.*
- *Ensures compliance with current APTA documents, including Standards of Practice for Physical Therapy and the Criteria, Guide to Physical Therapist Practice, Code of Ethics, Guide for Professional Conduct, Standards of Ethical Conduct for the Physical Therapist Assistant, and Guide for Conduct of the Physical Therapist Assistant.*
- *Ensures that services are consistent with the mission, purposes, and goals of the physical therapy service.*
- *Ensures that services are provided in accordance with established policies and procedures.*
- *Ensures that the process for assignment and reassignment of physical therapist staff (handoff communication) supports individual physical therapist responsibility to their patients and meets the needs of the patients/clients.*
- *Reviews and updates policies and procedures.*
- *Provides for training of physical therapy support personnel that ensures continuing competence for their job description.*
- *Provides for continuous in-service training on safety issues and for periodic safety inspection of equipment by qualified individuals.*

E. Fiscal Management

The director of the physical therapy service, in consultation with physical therapy staff and appropriate administrative personnel, participates in the planning for and allocation of resources. Fiscal planning and management of the service is based on sound accounting principles.

The fiscal management plan:

- *Includes a budget that provides for optimal use of resources.*

- *Ensures accurate recording and reporting of financial information.*
- *Ensures compliance with legal requirements.*
- *Allows for cost-effective utilization of resources.*
- *Uses a fee schedule that is consistent with the cost of physical therapy services and that is within customary norms of fairness and reasonableness.*
- *Considers option of providing pro bono services.*

In summary: The Standards and accompanying Criteria say a person who is not a PT may be the decision-maker with regard to the financial aspects of running a physical therapy service. See Standards, II (E). This role could be filled by a PTA, an accountant, a medical doctor, or some other non-PT. Many decisions have financial or fiscal implications, so the boundary between II (E) and II (D) of the Standards is by no means clear-cut. Determinations concerning the role a non-PT may play are not black-and-white matters. However, with regard to the nonfinancial aspects of running a physical therapy service, the Standards and Criteria appear to say that the decision-maker shall be a PT. See Standards, II (D).

Sincerely,

A handwritten signature in black ink that reads "Sharon L. Dunn". The signature is written in a cursive, flowing style.

Sharon Dunn, PT, PhD, OCS
President of the American Physical Therapy Association

