



November 27, 2017

The Honorable Stephen A. Huffman
Chairman
Ohio State House Health Committee
77 S. High Street
12th Floor
Columbus, Ohio 43215

Dear Chairman Huffman:

The American Osteopathic Association (AOA) and the Ohio Osteopathic Association (OOA) are writing to ask that you oppose substitute House Bill 131. This bill expands the scope of practice for physical therapists (PTs) to allow them to order X-rays, even if their doctorate program requires no coursework in diagnostic imaging. It also contains language which may be construed to allow PTs to establish certain medical diagnoses. The AOA and OOA believe that this increase in scope of practice for PTs is inappropriate, could lead to significant costs to the health care system in Ohio, and potentially place the health and safety of patients in the state at risk.

The AOA represents nearly 130,000 osteopathic physicians (DOs) and osteopathic medical students, promotes public health, encourages scientific research, serves as the primary certifying body for DOs and is the accrediting agency for osteopathic medical schools. More information on DOs/osteopathic medicine can be found at www.osteopathic.org. OOA is a professional medical organization that represents the interests of the more than 5,000 DOs in Ohio.

The AOA and OOA support the “team” approach to medical care because the physician-led medical model ensures that professionals with complete medical education and training are adequately involved in patient care. While we value the contributions of PTs to the health care delivery system, we believe any expansion of their authority to provide services to patients requires appropriate physician oversight and commensurate increases in education, training and competency demonstration requirements, which this bill does not provide.

Osteopathic and allopathic (MD) physician education includes:

- **Four years of medical school**, which includes **two years of didactic study** totaling upwards of 750 lecture/practice learning hours just within the first two years, **plus two more years of clinical rotations** done in community hospitals, major medical centers and doctors' offices.
- **12,000 to 16,000 hours of supervised postgraduate medical education**, i.e., residencies, where DOs and MDs develop advanced knowledge and clinical skills relating to a wide variety of patient conditions.

- Ohio-licensed physicians must complete **100 continuing medical education hours per two-year renewal period.**

PT education includes:

- Graduation from a master's- or doctorate-level education program accredited by a national physical therapy accreditation agency, which requires **a minimum of only 120 academic semester credits.**
- Following graduation, PTs are **not required to complete any postgraduate supervised medical education.**
- The Doctor of Physical Therapy at Mount St. Joseph University **does not require any coursework in diagnostic imaging;**¹ other Ohio programs require **only three credit hours.**²
- Ohio-licensed PTs complete **only 24 continuing education hours per two-year renewal period.**

Substitute House Bill 131:

- **Allows PTs to order X-rays** if the PT holds a doctorate degree, even if the doctorate degree program does not include any coursework on diagnostic imaging.
- **Allows PTs who hold a master's degree to order X-rays if he or she has “completed continuing education courses in imaging”** that meet standards established in rule adopted by the PT licensing board and approved by the Ohio Physical Therapy Association. The content of these courses is unspecified, and is to be established by organizations comprised largely of PTs, who lack the training and education necessary to approve these courses.
- Changes language prohibiting a PT from establishing a medical diagnosis from “a medical diagnosis of a patient’s *disability*” to “the medical diagnosis of a *disease*.” In order to avoid confusion, we believe that this bill should include the following, express language stating that physical therapy does not include a medical diagnosis:

Lines 63-64 “Physical therapy diagnosis does not include the medical diagnosis of disease **or a patient’s disability.**”

Diagnostic imaging, including X-rays, poses a potential risk to patient safety, due to the presence of radiation, which can cause cell mutations that may lead to cancer. If the number of clinicians with the ability to order diagnostic imaging increases, the risk that patients will be exposed to duplicative or otherwise unnecessary imaging also increases. Further, PTs have not had similar education and training to a physician, which prepares them to understand the risks and appropriate use of diagnostic imaging.

We urge you to protect the safety of Ohio patients by opposing substitute House Bill 131. Should you need any additional information, please feel free to contact Raine Richards, JD, Director, Public Policy at rrichards@osteopathic.org or (800) 621-1773, ext. 8199.

¹ See <http://registrar.msj.edu/graduate-catalog/graduate-programs/physical-therapy/requirements-for-dpt-program/>.

² See <http://www.csuohio.edu/sciences/health-sciences/dpt-curriculum-0>.

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Sincerely,



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President, AOA



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