
INTEROFFICE MEMORANDUM

TO: ALL NC PT AND PTA ACADEMIC EDUCATIONAL PROGRAMS AND PROGRAM DIRECTORS

FROM: NORTH CAROLINA BOARD OF PHYSICAL THERAPY EXAMINERS
KATHY O. ARNEY, PT, MA EXECUTIVE DIRECTOR

SUBJECT: TEMPORARY PERMITS FOR NEW GRADUATES

DATE: 12-02-21

CC: TERESA HALE, PT, BOARD CHAIR
DAVID C. GADD, ATTORNEY
KATHY O. ARNEY, PT, EXECUTIVE DIRECTOR NCBPTE

At its meeting December 1, 2021 the North Carolina Board of Physical Therapy Examiners (Board) discussed a recommendation from the Board's Public Protection Task Force (PPTF) recommending that rules to reinstate temporary permits for new graduates not be reinstated. This memo contains steps the PPTF took to review and analyze the topic and make the recommendation and considerations for alternate actions NC PT and PTA academic education programs action to mitigate student perceived hardships.

In May, 2021 the Board received a letter signed by 16 of 21 North Carolina PT/PTA academic education program directors requesting the Board consider reinstatement of rules repealed in August, 1998 for "Recent Graduates" allowing temporary privileges to practice via permit.

Issues precipitating this request include:

- the financial need of new graduates to work with all privileges of a licensee (without having a license) immediately post-graduation
- mental health issues described as anxiety related to high stakes testing and passage of the National PT Exam (NPTE)
- the need to be licensed for acceptance into post-graduate residency programs
- fixed date testing of the NPTE taking and passing
 - delaying timing of licensure;
 - delaying obtaining work as a licensee
 - delaying entry into post-graduate residencies
- licensure timing – delays due to required documentation and test scores receipt at the Board office needed for licensure
- Other states allowing some form of temporary permit or licensure not available in North Carolina

The PTF reviewed the topic at its July 27 and September 29, 2021 meetings. On September 29, 2021 the Board Rules Committee also reviewed the topic. Both the Task Force and Rules Committee considered:

- Letter of request dated May 24, 2021 sent by W. Todd Cade and Kyle Covington
- Board staff research on topics of concern
- Interviews with Kyle Covington, PT, faculty at Duke, PT Academic educational program and Dean McCall, PT, Director Martin Community College
- Board Rules repealed effective August 1, 1998 regarding Temporary Permits for New Graduates
- Presentation by current staff who formerly managed the Temporary New Graduate Permit process prior to the rule repeal
- Information regarding timing on residencies and fellowships
- FSBPT white papers on temporary licensure or permits in other US jurisdictions

The Public Protection Task Force and Rules Committee determined they would not support or recommend to the Board reinstatement of Board rules for Temporary Permits for new graduates for the following reasons:

- The issues noted forming the basis for the request to reinstate temporary permits for new graduates fall outside the Board's legislatively mandated mission of public protection to the citizens of North Carolina. More specifically the Board's powers and duties include: examining and determining the qualifications and fitness of applicants for a license to practice physical therapy in North Carolina and to "issue...licenses" to practice physical therapy in the state. The established standards and qualifications for initial licensure requires taking and passing a computer-based examination and the approval of other required applicant credentials. Without taking and passing the National Physical Therapy Examination (NPTE), the Board is not assured minimum criteria are met for competence to practice and thus for licensure. Allowing applicants to work in the capacity of a licensee without first meeting the most important requirement to demonstrate the knowledge base qualifications mitigates the Board's ability to assure the public they are being provided services of qualified, competent licensees.
- In NC, no other large healthcare occupational license Board issues temporary permits to practice for those who have not met the licensure qualification requirements.

Both the Task Force and Rules Committee understand limited test dates affect the timing of students' ability to take and pass the exam. Due to the COVID-19 pandemic, the Board implemented temporary rules, which became permanent September 1, 2021, enabling applicants to take the NPTE up to 150 days (5 months) prior to graduation, if their academic educational program qualifies them "on track to graduate," thereby increasing the testing window from 90 to 150 days in North Carolina. This Alternate Approval Pathway (AAP) provides educational programs opportunity to determine criteria a student must meet to be eligible to participate in "early testing". Early testing has been offered to students who qualify since 2013, when an international cheating scandal identified by FSBPT caused them to reduce dates to take the NPTE to five times per year. The option to take the test up to 5 months prior to graduation enables qualified students who take and pass the exam and who has met all other criteria for licensure to be licensed on or within several days of graduating with a completed application for licensure to the Board.

At its meeting on December 1, 2021, the Board reviewed:

- Emails on 10-30-21 and 10-31-21 from North Carolina PT/PTA academic education program directors supporting temporary permits for new graduates, who have not yet taken and passed the NPTE. A total of 5 emails received and are found below:

NC PT/PTA Academic Education Program	Emailed communication
<p>Dave Hudson, PhD, PT Distinguished Professor and Department Head Department of Physical Therapy Director: Human Movement Science Lab Western Carolina University Cullowhee, NC 28723</p> <p>O: 828-227-7070</p>	<p>Thanks everyone,</p> <p>WCU is also in full support of temporary licensure. Timing for residencies is certainly one consideration, but the significant financial impact of delaying work is primary. The clock starts ticking for debt repayment at graduation. Dave</p>
<p>Gina Musolino – Methodist University PT program</p> <p>gmusolino@methodist.edu</p>	<p>Greetings all, In a conversation with Exec. I have shared how the temp was implemented in FL and the # of jurisdictions at that time that offer the temp. It is certainly in NC best interest to pursue and MU DPT remains in support. Gina Musolino</p>
<p>Todd Cade, Ph.D – Duke University PT program</p> <p>todd.cade@duke.edu</p>	<p>Thanks All-</p> <p>We here at Duke agree with Amy and Debby regarding licensing. Most of our students take the NPTE exam early in April which takes time studying and their focus away from successfully completing their terminal affiliation (which we discourage BTW). If there was a temporary license or a date closer to the end of May, it would be very beneficial for us.</p> <p>Thanks! Todd</p>
<p>Deborah L. Givens, PT, DPT, PhD, FAPTA Dr. Margaret Lee Moore Distinguished Professor in Physical Therapy Director, Division of Physical Therapy UNC at Chapel Hill 3032 Bondurant Hall, CB 7135 Chapel Hill, NC 27599-7135 email: deborah_givens@med.unc.edu office: 919-843-8660 https://www.med.unc.edu/ahs/physical/</p>	<p>Amy, Kathy, and all, Thank you for bringing up the temporary licensure issue. We are anxiously awaiting the word on this since our graduates at UNC fall so close to the July NPTE test date.... It is a significant problem for our UNC Chapel Hill graduates who finish at the end of July and their official diploma is not issued until early August. Many residencies start with the academic calendar in August. We had an issue with a PT graduate from an Ohio school this year whose program also ended at the same time and we could not process for credentialing due to the holdup of the diploma and licensure for our residency.</p>

	<i>Debby</i>
<p>Amy Gross McMillan, PhD, PT Associate Professor and Chair DPT Program Director Department of Physical Therapy 2410B Health Sciences Building Greenville NC 27834 252-744-6232 GROSSMCMILLANA@ecu.edu</p>	<p>Kathy, Thank you for updating us all on NCBPTE items. I've included all DPT program directors on this email. Several of us met during the Educational Leadership Conference last week, and discussed current issues and concerns in DPT education in NC and nationally.</p> <p>Significant areas of concern continue to be student debt, student mental health, and timing of NPTE fixed dates (especially for those graduating in May). We (along with PTA program directors) recently submitted a request to NCBPTE to consider temporary licensure in NC, which would significantly ease graduates' financial stress by allowing them to work while waiting to take the NPTE. This would also allow May grads to start residencies which begin July 1 and expect grads to be licensed.</p> <p>Can you give us an update on the process of making such a change, and where this request is in that process? Thank you AGM</p>

- A summary by the Public Protection Task Force Chair of the review and analysis of the issue to support its recommendation to the Board.

The Board has spent considerable time considering ways to facilitate licensure for qualified new graduates while maintaining the integrity of the Board's mission. The Board has made changes that may address some of the concerns expressed by the academic programs and would recommend programs consider these:

- Use of the Alternative Approval Pathway (AAP) option for early testing which increases the time in which a qualified student could test prior to graduation. Because this change to AAP is a newer development for PT/PTA academic educational programs in North Carolina, there may not have been enough time to for programs to consider benefits to the program and their qualified students.

Several programs in North Carolina do have criteria students are required to achieve in order for a program director to make them eligible to test early. The criteria within the specific program are published and known to that student body. If an individual student has personal goals such as immediate employment or residency acceptance, they could have a path to early testing to achieve those goals.

- Federation of State Board of Physical Therapy (FSBPT) own and administer the NPTE. During the calendar year 2022, FSBPT has created testing “windows” surrounding the 5 fixed test dates per year, a small, but potentially meaningful increase in opportunities to take the exam. Licensure Boards in the US have expressed their support for opening additional testing dates and educational programs are encouraged to do the same.
- Students awaiting licensure can work in clinical settings as physical therapy aides. Board member clinic owners express that they have hired those awaiting licensure in their clinics.
- Entry to the physical therapy profession as a practicing professional requires a license in all US jurisdictions for the purpose of public protection. A permit contains limitations that have the potential to create hardships for the permit holder and an employer if the permit holder does not meet the ultimate goal of passing the NPTE.