



AK PT/OT Board - Scope of Practices Committee Mtg - June 6, 2025

Alaska Division of Corporations, Business and Professional Licensing
Juneau - Zoom
2025-06-06 08:00 - 10:00 AKDT

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previously tabled

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AK PT/OT Board - Scope of Practices Committee Mtg - June 6, 2025

Alaska Division of Corporations, Business and Professional Licensing
Friday, June 6, 2025 at 8:00 AM AKDT to 10:00 AM AKDT
Juneau - Zoom

Meeting Details: <https://us02web.zoom.us/j/85323233325?pwd=lbAf3LvoYy2NL93iAzc9aIDaVSjhRJ.1>

Meeting ID: 853 2323 3325

Passcode: 962474

Call-in: +1 253 205 0468 US

Agenda

- | | |
|--|-----------------|
| 1. Call to Order/Roll Call | 8:00 AM |
| Committee Members:
Tori Daugherty
Jonathan Gates | |
| 2. Review/Approve Agenda | 8:05 AM |
| 3. Approve Minutes - 03/07/2025 | 8:10 AM |
| 4. Public Comment | 8:15 AM |
| 5. NEW Board Correspondence | 8:25 AM |
| A. OT Scope Questions | |
| B. PT Scope Questions | |
| C. Generic | |
| 6. Legislative Initiatives | 9:40 AM |
| A. PT Modernization Statutory Project | |
| B. OT Modernization Statutory Project | |
| C. DPT/OTD Term Protection Statutory DRAFT Language | |
| previously tabled | |
| 7. Next Steps | 9:55 AM |
| 8. Adjourn | 10:00 AM |

From: [Board of Physical and Occupational Therapy \(CED sponsored\)](#)
To: [Schultz, Adrianna L](#)
Subject: RE: Legality Questions
Date: Wednesday, May 28, 2025 12:26:03 PM
Attachments:

Hello Adrianna,

Thank you for submitting your questions for the Board of Physical Therapy and Occupational Therapy. They will be forwarded to the board to research and discuss at their next board meeting scheduled for October 2-3, 2025. A response will be forwarded as soon as it is available.

I understand your need for clarification and would like to provide resources to assist in the meantime. The Alaska Physical Therapy and Occupational Therapy Statutes and Regulations are available here → <https://www.commerce.alaska.gov/web/Portals/5/pub/PT-OTStatutes.pdf>. While the PT/OT board does have specific regulations regarding Telerehabilitation for PT in 12 AAC 54.530 and OT in 12 AAC 54.825, the bulk of requirements for Telehealth is located in Centralized Statutes AS 08.02.130 → https://www.commerce.alaska.gov/web/Portals/5/pub/Centralized_Licensing_Stats.pdf. You can also find a general overview on the state website here → <https://www.commerce.alaska.gov/web/cbpl/TelehealthInformation.aspx>

One overarching statement I need to make regarding your questions below - the PT/OT board does not have jurisdiction over employment policies or insurance practices unless they are in direct conflict with the statutes within AS 08.84 or regulations 12 AAC 54.

- 1. The organization I work for spreads across the state of Alaska with many clinics and hospitals. One of these hospitals does not have OT services and I was asked if I could complete an evaluation via telehealth to assist this patient getting into acute rehab. The plan was for the PT to be present and help facilitate the evaluation while reporting back to me outcomes/values. Could you speak to whether or not this can be done? Would it come down to hospital-specific policies and procedures or do we need to follow state/federal guidelines?*

[That is an excellent question. AK PT/OT statutes and regulations are silent on the specific issue. An applicable reference would be within the PT/OT Principles of Practice adopted in March 2015. Principle 6 states that therapists shall comply with institutional rules, local, state, federal, and international laws applicable to the profession. The order of which entity takes precedence will be one for the board to discuss. Regarding whether a PT can assist and help facilitate an OT evaluation is a complex question and one I will leave up to the board to address.](#)

2. *Since I started at my hospital, the policy for re-evaluations included every 30 days or when there was a change in status, which included procedures requiring general anesthesia. Our new clinical director has changed re-evaluation requirements that do not cover all general anesthesia procedures and instead, only if there is a change to diagnosis or plan of care (e.g. requiring re-evaluation for ORIF; however, not requiring re-evaluation for I&Ds and wound vac placements). Similar, would it come down to hospital-specific policies and procedures or do we need to follow state/federal guidelines?*

That is another excellent question. AK PT/OT statutes and regulations are silent on re-evaluations. An applicable reference would be within the [PT/OT Principles of Practice](#) adopted in March 2015. Principle 6 states that therapists shall comply with institutional rules, local, state, federal, and international laws applicable to the profession. The order of which entity takes precedence will be one for the board to discuss.

3. *Lastly, is there a limit of the amount of re-evaluations that can be completed within a specific amount of time?*

Alaska PT/OT statutes and regulations are silent on this specific issue. An applicable reference would be within the [PT/OT Principles of Practice](#) adopted in March 2015. Principle 6 states that therapists shall comply with institutional rules, local, state, federal, and international laws applicable to the profession. Alaska Workers Compensation guidelines can be found in AS 23.30.095 and 8 AAC 45.086 → <https://www.akleg.gov/basis/aac.asp#8.45.086>

Best regards,



Sheri Ryan
Licensing Examiner 3 Advanced
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Are you subscribed to the PT/OT Board Listserv? Receive notifications of board meetings, important announcements/updates, and notices of proposed changes to regulations! Subscribe [NOW!](#)

Effective May 1, 2025 – Physical Therapy Licensure Compact NOW OPERATIONAL through the [PT Compact Commission](#) for Alaska!

From: Schultz, Adrianna L

Sent: Sunday, May 25, 2025 7:58 AM

To: Board of Physical and Occupational Therapy (CED sponsored)
<physicalandoccupationaltherapy@alaska.gov>

Subject: Legality Questions

CAUTION: This email originated from outside the State of Alaska mail system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi there,

I hope this email finds you well. I have a few questions about the legality/ethicality for evaluating and re-evaluating patients in the acute care setting.

1. The organization I work for spreads across the state of Alaska with many clinics and hospitals. One of these hospitals does not have OT services and I was asked if I could complete an evaluation via telehealth to assist this patient getting into acute rehab. The plan was for the PT to be present and help facilitate the evaluation while reporting back to me outcomes/values. Could you speak to whether or not this can be done? Would it come down to hospital-specific policies and procedures or do we need to follow state/federal guidelines?
2. Since I started at my hospital, the policy for re-evaluations included every 30 days or when there was a change in status, which included procedures requiring general anesthesia. Our new clinical director has changed re-evaluation requirements that do not cover all general anesthesia procedures and instead, only if there is a change to diagnosis or plan of care (e.g. requiring re-evaluation for ORIF; however, not requiring re-evaluation for I&Ds and wound vac placements). Similar, would it come down to hospital-specific policies and procedures or do we need to follow state/federal guidelines?
3. Lastly, is there a limit of the amount of re-evaluations that can be completed within a specific amount of time?

If any of these are outside of your purview, could you please direct me to who to contact?

Thank you for your time!

-Adrianna

Adrianna Schultz, M.S., OTR/L, CSRS, PCES
Senior Occupational Therapist

From: [Lindsay Tucker](#)
To: [Board of Physical and Occupational Therapy \(CED sponsored\)](#)
Subject: Re: FW: License Required; Exceptions AS 08.84.150
Date: Wednesday, May 14, 2025 8:53:15 AM
Attachments:

CAUTION: This email originated from outside the State of Alaska mail system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Sheri,

Thanks again for the information! I've forwarded this information to my supervisor; however, I still have many concerns about the dissemination of this knowledge. Would you be willing to write a letter to DEED which outlines the statutes for professional licensing? I am afraid that they are giving misinformation to related service providers, businesses and school districts regarding the regulations and requirements for the state.

I feel like it would help clear up any confusion.

Thanks for your help!

Lindsay

On Tue, May 13, 2025 at 3:57 PM Board of Physical and Occupational Therapy (CED sponsored) <physicalandoccupationaltherapy@alaska.gov> wrote:

Hello Lindsay,

This is not an official board position statement. I am just providing the statutory reference for you. Here's the statute that references when someone providing occupational therapy is not required to have an Alaska license.

Sec. 08.84.150. License required; exceptions. (a) It is unlawful for a person to practice physical therapy without being licensed under this chapter unless the person is

- (1) a student in an accredited physical therapy program;
- (2) a graduate of a foreign school of physical therapy fulfilling the internship requirement of AS 08.84.032, and then only unless under the continuous direction and immediate supervision of a physical therapist;
- (3) issued a limited permit under AS 08.84.075; or
- (4) granted a compact privilege under AS 08.84.188.

(b) A person may not provide services that the person describes as occupational therapy without being licensed under this chapter unless the person is

- (1) a student in an accredited occupational therapy program or in a supervised field work program;
- (2) a graduate of a foreign school of occupational therapy fulfilling the internship requirement of AS 08.84.032, and then only unless under the continuous direction and immediate supervision of an occupational therapist;
- (3) an occupational therapist or occupational therapy assistant employed by the United States Government while in the discharge of official duties;
- (4) granted a limited permit under AS 08.84.075;
- (5) licensed under this title and uses occupational therapy skills in the practice of the profession for which the license is issued; or

(6) employed as a teacher or teacher's aide by an educational institution and is required to use occupational therapy skills during the course of employment, if

- (A) the occupational therapy skills are used under a program implemented by the employer and developed by a licensed occupational therapist;
- (B) the employer maintains direct supervision of the person's use of occupational therapy skills; and
- (C) the person does not represent to
 - (i) be an occupational therapist or occupational therapy assistant; and
 - (ii) practice occupational therapy.

There is one exception – and that is when an occupational therapist would be part of multidisciplinary care team of a physician – [see SB91](#) – effective October 17, 2024. You can read more on the state’s Telehealth information website here → <https://www.commerce.alaska.gov/web/cbpl/TelehealthInformation.aspx>

Please let me know if you have any additional questions.

Best regards,



Sheri Ryan

Licensing Examiner 3 Advanced

Board of Physical Therapy and Occupational Therapy
Board of Certified Direct-Entry Midwives
Athletic Trainers Program

Division of Corporations, Business and Professional Licensing

sheri.ryan@alaska.gov

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Effective May 1, 2025 – Physical Therapy Licensure Compact NOW OPERATIONAL through the [PT Compact Commission](#) for Alaska!

--
Háw'aa!

Lindsay

Lindsay Tucker, M.S., CCC-SLP
Speech-Language Pathologist

From: [Board of Physical and Occupational Therapy \(CED sponsored\)](#)
To: [Hannah Haakinson](#)
Subject: RE: 12 AAC 54.705
Date: Wednesday, April 30, 2025 1:13:00 PM
Attachments:

Hello Hannah,

I am sorry but I cannot answer your specific question. 12 AAC 54.705(c) is the only information available.

(c) In this section, "occupational therapy services" includes work and volunteer service under a position title other than occupational therapist or occupational therapy assistant if the applicant documents that the position required the use of occupational therapy skills recognized by the board.

I am forwarding your question to the Board of Physical Therapy and Occupational Therapy for clarification and will send their response as soon as available. Please note, the next scheduled board meeting is not until October 2-3, 2025.

[PT/OT Statutes and Regulations – March 2025](#)

Best regards,



Sheri Ryan
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COMING SOON!! – Physical Therapy compact privileges through the [PT Compact Commission](#) for Alaska.

From: Hannah Haakinson
Sent: Wednesday, March 12, 2025 2:30 PM
To: Board of Physical and Occupational Therapy (CED sponsored) <physicalandoccupationaltherapy@alaska.gov>
Subject: 12 AAC 54.705

CAUTION: This email originated from outside the State of Alaska mail system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good Afternoon,

I am writing for clarification on statute 12 AAC 54.705 regarding the 60 hours of work or volunteer experience per licensing period. Would the following be considered approved volunteer hours?

- volunteering for Challenge Alaska in their adaptive sports programs
- volunteering to help with handwriting curriculum in classroom or homeschool group
- volunteering with hippotherapy program or therapeutic riding program

If these are not considered approved, could you provide some examples of approved volunteer hours?

Thanks so much,

Hannah Haakinson

From: [Monique Hertz](#)
To: [Board of Physical and Occupational Therapy \(CED sponsored\)](#)
Subject: Request for Consideration of FCCPT CWT6 Report for PT Licensure
Date: Tuesday, May 20, 2025 8:20:47 AM

CAUTION: This email originated from outside the State of Alaska mail system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good Afternoon,

My name is Monique Hertz, and I am a foreign-educated physical therapist from Brazil. I earned my degree in 2009 and have extensive clinical experience in orthopedics and neurology. Since moving to the U.S., I've been working as a Pilates instructor in a physical therapy clinic, continuing to support clients with various rehabilitation needs.

I am in the process of applying for physical therapy licensure and have completed my credential evaluation through FCCPT using the most current version of the Coursework Tool, CWT6.

I understand that your requirements reference the use of CWT4 for applicants who graduated in my year. However, I would sincerely appreciate it if your board could consider accepting my evaluation under the CWT6 criteria, as it reflects the most updated and comprehensive standards established by FSBPT.

Please let me know if this might be possible or if you would need additional documentation from me or FCCPT.

Thank you very much for your time and consideration. I am very motivated to contribute to the physical therapy community in Alaska and would be grateful for your guidance on how best to proceed.

Warm regards,

Monique Hertz

From: [Board of Physical and Occupational Therapy \(CED sponsored\)](#)
To: "Martin, Anthony L"
Subject: RE: DPT Student Supervision
Date: Wednesday, April 30, 2025 1:10:00 PM
Attachments:

Hello Anthony,

While the board adopts regulations regarding supervision which are outlined in 12 AAC 54.500, 12 AAC 54.510, 12 AAC 54.520, 12 AAC 54.535, and 12 AAC 54.590, they do not have authority/jurisdiction over payers or payer policy regarding insurance and/or billing requirements which may differ and be more or less restrictive than Alaska regulation.

I am forwarding your question to the Board of Physical Therapy and Occupational Therapy for clarification and will send their response as soon as available. Please note, the next scheduled board meeting is not until October 2-3, 2025.

[PT/OT Statutes and Regulations – March 2025](#)

Best regards,



Sheri Ryan
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COMING SOON!! – Physical Therapy compact privileges through the [PT Compact Commission](#) for Alaska.

From: Martin, Anthony L
Sent: Friday, April 25, 2025 9:59 AM

To: Board of Physical and Occupational Therapy (CED sponsored)
<physicalandoccupationaltherapy@alaska.gov>
Subject: DPT Student Supervision

CAUTION: This email originated from outside the State of Alaska mail system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good morning,

My name is Anthony Martin, a senior PT and Site Coordinator for Clinical Education at Alaska Native Medical Center. I'm responsible in updating departmental procedures concerning Student Supervision for PT practice. I have done extensive amount of research on APTA and our statues and regulations on required supervision for PT billing and practice. I am wondering if you would be able to provide me some guidance/direction where I might be able to look or if you already have resources on the following. Anything would be appreciated!

1. Medicare part B: CMS has clearly stated its policy that student services under Part B are not billable, and that only services provided to Medicare beneficiaries by the PT may be billed. [My understanding is that a student must have "Direct Personal" Supervision, having a PT present in the room with the student and patient. Is this correct?
2. If a patient has two insurances; Private insurance as PRIMARY and Medicare Part B being the SECONDARY insurance, can a student provide services while the Physical Therapist is "onsite" and not direct supervision? Would you be able to clarify this?
3. Private Insurance: Can a student provide billable services, as stated in my second example, without PT being directly in the room?

Thank you for you help in this important matter. We are taking students and would like to get a clear understanding on this. If you could provide whatever insight you might have, or forward me to the right person, that would be highly appreciated! Thank you so much for your time.

Very respectfully,

Anthony Martin, PT, DPT, SCCE
APTA CCIP Level 1 and 2 Credentialed
Senior Physical Therapist

From: [Board of Physical and Occupational Therapy \(CED sponsored\)](#)
To: [GABRIELLE STERNER](#)
Subject: RE: PT Question
Date: Thursday, May 8, 2025 9:25:00 AM
Attachments:

Hello Gabrielle,

The Physical Therapy and Occupational Therapy Board has adopted regulations regarding supervision which are outlined in 12 AAC 54.500, 12 AAC 54.510, 12 AAC 54.520, 12 AAC 54.535, and 12 AAC 54.590. I cannot provide any more information than what is in regulation.

I am forwarding your question to the Board of Physical Therapy and Occupational Therapy for clarification and will send their response as soon as available. Please note, the next scheduled board meeting is not until October 2-3, 2025. A response may not be available until sometime afterwards as the board may refer the question to committee for research and drafting a response.

I realize this will not provide you with the information needed to facilitate summer school coverage, but all board discussion must be done in a public forum.

Reference: [PT/OT Statutes and Regulations – March 2025](#)

Best regards,



Sheri Ryan
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Effective May 1, 2025 – Physical Therapy Licensure Compact NOW OPERATIONAL through the [PT Compact Commission](#) for Alaska!

From: GABRIELLE STERNER

Sent: Tuesday, April 1, 2025 12:33 PM

To: Board of Physical and Occupational Therapy (CED sponsored)
<physicalandoccupationaltherapy@alaska.gov>

Subject: PT Question

CAUTION: This email originated from outside the State of Alaska mail system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hello, my name is Gabrielle Sterner, I am a physical therapist for Matsu Borough School District.

I have a question re: supervision of PTA's. I understand we are to provide direct supervision at least one time per month and do so.

I also understand that if a PT is not in the building with a PTA, the PT needs to be available during the PTA's work hours for any questions/collaboration ect.

My question is: Can an AK licensed PT be available via text, email, phone, zoom during a PTA's work hours if the PT is out of state?

We are trying to work out summer school coverage and I will be out of state but available as above. I am just not completely sure re: our state regulations on this matter.

Thank you in advance,
Gabrielle Sterner, PT

From: [Board of Physical and Occupational Therapy \(CED sponsored\)](#)
To: [Jeff Evans](#)
Subject: RE: Physical therapy - Telemedicine - Active Duty Overseas
Date: Thursday, May 8, 2025 9:34:00 AM
Attachments:

Hello Jeff,

While the board has adopted specific regulations regarding telerehabilitation for physical therapy which are outlined in 12 AAC 54.530, the majority of statute and regulations regarding telehealth are in Centralized Statute AS 08.02.130, 08.02.135, and 08.02.140. You can also find general information on the State website here → <https://www.commerce.alaska.gov/web/cbpl/TelehealthInformation.aspx>.

Your question is a complicated one that may not be something the Board will be able to answer as they do not have jurisdiction in Japan and cannot speak to what the requirements may be to providing physical therapy for a patient in an international country. The board can only speak to the licensing requirements for providing physical therapy services for a patient in the state of Alaska. I am forwarding your question to the Board of Physical Therapy and Occupational Therapy for clarification and will send their response as soon as available. Please note, the next scheduled board meeting is not until October 2-3, 2025.

[PT/OT Statutes and Regulations – March 2025](#)

[Centralized Statutes](#)

Best regards,



Sheri Ryan
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Effective May 1, 2025 – Physical Therapy Licensure Compact NOW OPERATIONAL through the [PT Compact Commission](#) for Alaska!

From: Jeff Evans
Sent: Wednesday, March 19, 2025 11:24 AM
To: Board of Physical and Occupational Therapy (CED sponsored) <physicalandoccupationaltherapy@alaska.gov>;
Subject: Physical therapy - Telemedicine - Active Duty Overseas

CAUTION: This email originated from outside the State of Alaska mail system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Sheri and team,

I had just called and was transferred to someone else and then sent to voicemail which I left. We have a client that is active duty military, is on a TDY to Japan, he has had shoulder surgery, 8 weeks ago, does not have access to physical therapy in Japan. His insurance Tricare (Triwest is third party administrator) covers Telehealth when they are on orders overseas. As long as we are in his home base, JBER/Anchorage. Confirming as licensed in Alaska, and this client based in Alaska, but on assignment in Japan, care was initiated here in Anchorage for 6 weeks and would have continued here.

<https://www.tricare.mil/CoveredServices/IsItCovered/Telemedicine>

As of Mar. 01, 2020, the care services telehealth care for applied behavior analysis parent or caregiver guidance services under the Autism Care Demonstration.

Using Telemedicine Services

Contact your [regional contractor](#) to see if you need a referral or pre-authorization. Active duty service members must have a referral for telemental health care.

Overseas

If you're overseas, the country where you live must allow telemedicine. Your provider must be licensed to practice where you live. Contact your [TOP Regional Call Center](#) for more information, including eligibility of providers.

Please clarify this is within our physical therapy license to provide continued care while he is in Japan for the next few months. We do have Telemedicine Registry that was initiated when COVID/pandemic presented.

Thanks you,
JEFF EVANS, PT, MPT, FAAOMPT

Alaska PT Licenses: 1229

Ove

Mo:

[Dent:](#)

[Presc](#)

[Visior](#)

[Ment:](#)

See

From: [Board of Physical and Occupational Therapy \(CED sponsored\)](#)
To: [Halee Henderson](#)
Subject: RE: AK OT/PT Employment Verification Forms
Date: Wednesday, April 9, 2025 7:55:00 AM
Attachments:

Hello Halee,

This is an interesting dilemma and one I would need to discuss with the board at their next meeting in order to provide you with an accurate answer. Unfortunately, their next scheduled meeting is not until October 2-3, 2025 of this year.

We have many staffing agencies complete work experience verifications for therapists and this has not been a situation in the past. I would recommend for the time being, you list "Confidential" for the name so you are not violating any agreements you may have an include a notice to the board regarding why you as a staffing agency are unable to disclose. The more information we can provide to the board to assist the applicant in the endeavor for licensure, the better.

Please let me know if you have any further questions.

Best regards,



Sheri Ryan
Licensing Examiner 3 Advanced
Board of Physical Therapy and Occupational Therapy
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Division of Corporations, Business and Professional Licensing

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www.commerce.alaska.gov



From: Halee Henderson
Sent: Tuesday, March 18, 2025 8:40 AM
To: Board of Physical and Occupational Therapy (CED sponsored)

<physicalandoccupationaltherapy@alaska.gov>

Subject: AK OT/PT Employment Verification Forms

CAUTION: This email originated from outside the State of Alaska mail system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

To whom it may concern,

We are a travel healthcare staffing agency helping provide temporary staff to facilities through the nation.

Since we are a staffing agency, we cannot provide names of the facilities we contract with. Is it acceptable if we put "Confidential" for the name of the facility and provide the city and state they are located in for the facility address in the 'Employer' section of the Employment Verification Form?

Thank you!

Halee Henderson

LICENSING SPECIALIST



Medical Solutions
FocusOne Solutions
Host Healthcare
Matchwell
WorldWide HealthStaff Solutions

From: [Board of Physical and Occupational Therapy \(CED sponsored\)](#)
To: [Jana Woodruff](#)
Subject: RE: OT / PT state licensure questions
Date: Thursday, January 30, 2025 2:21:00 PM
Attachments:

Hello Jana,

No additional professional license is required for a physical therapist/physical therapist assistant or occupational therapist/occupational therapy assistant to work within a Skilled Nursing Facility (SNF) setting.

However, there may be different regulations that govern services provided by PT/OT therapists in that setting.

PT/OT statutes are found in AS 08.84 and regulations are in 12 AAC 54 →
<https://www.commerce.alaska.gov/web/Portals/5/pub/PT-OTStatutes.pdf>

Skilled Nursing Facility services regulations are found in 7 AAC 140.500 – 595 →
<https://www.akleg.gov/basis/aac.asp#7.140.500>

Best regards,



Sheri Ryan
Licensing Examiner 3 Advanced
Board of Physical Therapy and Occupational Therapy
Board of Certified Direct-Entry Midwives
Athletic Trainers Program
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sheri.ryan@alaska.gov
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From: Jana Woodruff
Sent: Tuesday, January 21, 2025 10:14 AM
To: Board of Physical and Occupational Therapy (CED sponsored) <physicalandoccupationaltherapy@alaska.gov>
Subject: Re: OT / PT state licensure questions

Good morning - I have one additional Question... In the state of Alaska, are OT/PT required to have an additional license to provide outpatient services within the SNF setting? For example, if a SNF patient discharges home but wants to return to the SNF for outpatient therapy... Does the therapist/facility, have to maintain a separate license to provide those services?

Thank you.

Jana Woodruff, OTR/L, CLT, RAC-CT
Therapy QA Regional Director

From: Board of Physical and Occupational Therapy (CED sponsored) <physicalandoccupationaltherapy@alaska.gov>
Sent: Tuesday, January 7, 2025 10:44 AM
To: Jana Woodruff, OTR/L, RAC-CT <jana.woodruff@pacs.com>
Subject: RE: OT / PT state licensure questions

Hello Jana!

Happy to assist with your questions.

1. Is there a maximum number of therapy assistants that and OT / PT can supervise at any given time?
 1. [12 AAC 54.500\(e\)](#) A Physical Therapist may not supervise more than three aides, assistants, students, foreign-educated candidates, or permittees in any combination at the same time. [12 AAC 54.410\(c\)](#) (c) Except as specified in [12 AAC 54.500\(e\)](#), a physical therapist may supervise a maximum of three physical therapist assistants.
 2. [12 AAC 54.800\(b\)](#) An occupational Therapist may not supervise more than three aides, assistants, students, foreign-educated candidates, or permittees at the same time, in any combination.
2. Does each daily treatment note written by a therapy assistant require a co-signature from the evaluating OT / PT?
 1. [12 AAC 54.510](#) – Supervision of Physical Therapist Assistants. The regulations are silent on the particular question you asked. [12 AAC 54.510\(g\)\(3\)](#) does state: If a licensed physical therapist agrees to supervise a physical therapist assistant, the supervising physical therapist shall countersign the patient treatment record each time the supervising physical therapist is physically present and directly supervises or supervises by video or teleconference the treatment of a patient by the physical therapist assistant being supervised.
 2. [12 AAC 54.810](#) covers supervision of Occupational Therapy Assistants. The regulations are silent on the particular question you asked. [12 AAC 54.810 \(b\)\(3\)](#) does state: If the licensed occupational therapist agrees to supervise an occupational therapy assistant, the occupational therapist shall countersign the patient treatment record each time the occupational therapist supervising the occupational therapy assistant is physically present and directly supervises or supervises by video or teleconference the treatment of a patient by the occupational therapy assistant being supervised.
3. May therapy assistants participate in writing / completing a progress note? Discharge summary? [The board is currently in the process of answering this question as a clarification request for a licensee for both PTA/OTAs.](#)
4. Does Alaska have state regulations on frequency of therapy assistant supervision? [See below.](#) frequency of progress note cadence? [No – regulations are silent on this. The board is currently](#)

reviewing supervision regulations as we get these questions quite frequently from licensees.

1. 12 AAC 54.510 – Supervision of Physical Therapist Assistants. (e) At least once a month, a supervising physical therapist shall provide periodic supervision to a physical therapist assistant while the physical therapist assistant being supervised implements a treatment plan with a patient. Supervision shall be conducted on site or by video or teleconference when in-person supervision is not reasonably practicable. The supervising physical therapist shall be available for consultation with the physical therapist assistant by telephone, verbally, or in writing.
2. 12 AAC 54.810 – Supervision of Occupational Therapy Assistants. (a)(1) at least once every month, while the occupational therapy assistant being supervised implements a treatment plan for a patient, the occupational therapist supervising the licensed occupational therapy assistant shall be physically present, or shall be present by video or teleconference when in-person supervision is not reasonable or practicable;

12 AAC 54.510. SUPERVISION OF PHYSICAL THERAPIST ASSISTANTS. (a) A physical therapist assistant shall work under the supervision of a licensed physical therapist.

(b) A licensed physical therapist is responsible for and shall participate in a patient's care.

(c) Except as specified in 12 AAC 54.500(e), a physical therapist may supervise a maximum of three physical therapist assistants.

(d) A licensed physical therapist assistant shall have written treatment plans formulated by the licensed physical therapist in possession for each patient under the care of the physical therapist assistant. Treatment plans must be revised following periodic evaluations by the licensed physical therapist.

(e) At least once a month, a supervising physical therapist shall provide periodic supervision to a physical therapist assistant while the physical therapist assistant being supervised implements a treatment plan with a patient. Supervision shall be conducted on site or by video or teleconference when in-person supervision is not reasonably practicable. The supervising physical therapist shall be available for consultation with the physical therapist assistant by telephone, verbally, or in writing.

(f) Nothing in this chapter restricts public health service or military personnel engaged in the practice of physical therapy in programs administered by federal agencies.

(g) If a licensed physical therapist agrees to supervise a physical therapist assistant, the supervising physical therapist shall

(1) determine the frequency and manner of consultations with the physical therapist assistant, taking into consideration the treatment settings being used, patient rehabilitation status, and the competency of the physical therapist assistant;

(2) fully document the supervision provided, including a record of all consultations provided, and maintain those records at the physical therapist assistant's place of employment; and

(3) countersign the patient treatment record each time the supervising physical therapist is physically present and directly supervises or supervises by video or teleconference the treatment of a patient by the physical therapist assistant being supervised.

Authority: AS 08.84.010

12 AAC 54.810. SUPERVISION OF OCCUPATIONAL THERAPY ASSISTANTS. (a) An occupational therapy assistant shall work under the supervision of a licensed occupational therapist. To meet this supervision requirement,

(1) at least once every month, while the occupational therapy assistant being supervised implements a treatment plan for a patient, the occupational therapist supervising the licensed occupational therapy assistant shall be physically present, or shall be present by video or teleconference when in-person supervision is not reasonable or practicable; and

(2) the occupational therapist supervising the occupational therapy assistant shall be available for consultation with the occupational therapy assistant being supervised, through telephone consultations, written reports, or in-person conferences.

(b) If the licensed occupational therapist agrees to supervise an occupational therapy assistant, the occupational therapist shall

(1) determine the frequency and manner of consultations, taking into consideration the treatment settings being used, patient rehabilitation status, and the competency of the occupational therapy assistant being supervised;

(2) fully document the supervision provided, including a record of all consultations provided, and maintain those records at the occupational therapy assistant's place of employment; and

(3) countersign the patient treatment record each time the occupational therapist supervising the occupational therapy assistant is physically present and directly supervises or supervises by video or teleconference the treatment of a patient by the occupational therapy assistant being supervised.

Authority: AS 08.84.010 AS 08.84.030 AS 08.84.190

12 AAC 54.590(6) "supervision" means (A) the licensed physical therapist will be present whenever a patient is evaluated, a treatment program is established, or a treatment program is changed; and (B) the licensed physical therapist is present to personally review the diagnosis of the condition to be treated, to authorize the procedure, and before dismissal of the patient, to evaluate the performance of the treatment given.

12 AAC 54.890(6) "supervision" means (A) the licensed occupational therapist will be present whenever a patient is evaluated, a treatment program is established, or a treatment program is changed; and (B) the licensed occupational therapist is present to personally review the diagnosis of the condition to be treated, to authorize the procedure, and before dismissal of the patient, to evaluate the performance of the treatment given.

[Alaska Physical Therapy and Occupational Therapy Statutes and Regulations](#) – August 2024 Edition

Please let me know if you have any additional questions.

Best regards,



Sheri Ryan
Licensing Examiner 3 Advanced
Board of Physical Therapy and Occupational Therapy
Board of Certified Direct-Entry Midwives
Athletic Trainers Program
Division of Corporations, Business and Professional Licensing

sheri.ryan@alaska.gov
Office: 907-269-6425 | Fax: 907-465-2974
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From: Jana Woodruff, OTR/L, RAC-CT

Sent: Tuesday, January 7, 2025 8:06 AM

To: Board of Physical and Occupational Therapy (CED sponsored) <physicalandoccupationaltherapy@alaska.gov>

Subject: OT / PT state licensure questions

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Good morning - My name is Jana and I am an OT in the state of Idaho. I have recently taken a regional director position which includes your state of Alaska. I have a few questions that I would appreciate your help in answering so I can better support the therapists there.

1. Is there a maximum number of therapy assistants that and OT / PT can supervise at any given time?
2. Does each daily treatment note written by a therapy assistant require a co-signature from the evaluating OT / PT?
3. May therapy assistants participate in writing / completing a progress note? Discharge summary?
4. Does Alaska have state regulations on frequency of therapy assistant supervision? frequency of progress note cadence?

Thank you so much for your time in answering these questions.

Jana Woodruff, OTR/L, RAC-CT, OTR/L, CLT, RAC-CT
Therapy QA Regional Director

From: [Board of Physical and Occupational Therapy \(CED sponsored\)](#)
To: [Tom Class](#)
Subject: RE: Required 60 hours to maintain my state license Thursday,
Date: May 29, 2025 6:55:14 AM
Attachments:

Good morning Tom,

You are correct. 12 AAC 54.705(2)(B) allows you to substitute an additional 40 hours of continuing education for the 60 practice hours of occupational therapy.

Please note: the 40 hours is on top of the 24 contact hours required under 12 AAC 54.710. To be clear, you would be responsible for completing a minimum of 64 contact hours of continuing education over the two year licensing period of 07/01/2024 through 06/30/2026 that meet the requirements under 12 AAC 54.715 Approved Occupational Therapy Courses and Activities.

Best regards,



Sheri Ryan
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Effective May 1, 2025 – Physical Therapy Licensure Compact NOW OPERATIONAL through the [PT Compact Commission](#) for Alaska!

From: Tom Class <Tclass@alaskabvi.org>
Sent: Wednesday, May 28, 2025 3:45 PM
To: Board of Physical and Occupational Therapy (CED sponsored) <physicalandoccupationaltherapy@alaska.gov>
Subject: RE: Required 60 hours to maintain my state license

Thanks for getting back to me.

My current full time employment is not exactly Occupational Therapy, but if I can do 40 extra hours of CEU courses instead of the 60 hours of OT practice I might go that route. Please let me know if my understanding is correct regarding substituting extra CEUs for OT hours.

Tom Class, COTA/L
Activities of Daily Living Instructor
Equipping Alaskans for success

Alaska Center for the Blind and Visually Impaired
3903 Taft Drive
Anchorage, Alaska 99517
Main Line: (907)248-7770
Direct Line: (907)771-4324
tclass@alaskabvi.org

From: Board of Physical and Occupational Therapy (CED sponsored)
<physicalandoccupationaltherapy@alaska.gov>
Sent: Wednesday, May 28, 2025 1:40 PM
To: Tom Class <tclass@alaskabvi.org>
Subject: FW: Required 60 hours to maintain my state license

You don't often get email from physicalandoccupationaltherapy@alaska.gov. [Learn why this is important](#)

From: Board of Physical and Occupational Therapy (CED sponsored)
<physicalandoccupationaltherapy@alaska.gov>
Sent: Wednesday, May 28, 2025 1:37 PM
To: tommy class <tclass12@gmail.com>
Subject: RE: Required 60 hours to maintain my state license

Hello Thomas,

Here's the regulations that provide explanation on your professional practice requirements. The customary way of documenting this requirement at audit is through the use of the attached form - #08-4857 which involves having your employer verify that you have provided occupational services in the required time frame. See the attestation in the Organization or Agency section:

I hereby certify the above-named therapist performed at least 60 hours of physical therapy or occupational therapy services between the dates of July 1, 2022 and June 30, 2024.

12 AAC 54.705. REQUIRED CONTINUING OCCUPATIONAL THERAPY PROFESSIONAL PRACTICE AND ALTERNATIVES. (a) An applicant for renewal of an occupational therapist or occupational therapy assistant license shall document

(1) having provided occupational therapy services for at least 60 hours during the concluding licensing period;
or

(2) successful completion during the concluding licensing period of one of the following:

(A) the applicable of the following certification examinations sponsored by the National Board for Certification in Occupational Therapy:

(i) for an occupational therapist, the Certification Examination for Occupational Therapist, Registered;

or

(ii) for an occupational therapy assistant, the Certification Examination for Certified Occupational Therapy Assistant;

(B) in addition to the contact hours of continuing education required under 12 AAC 54.710, 40 contact hours of continuing education that is consistent with the requirements of 12 AAC 54.710 - 12 AAC 54.720;

(C) a review course sponsored by a school of occupational therapy approved by the American Occupational Therapy Association; or

(D) an occupational therapy internship of 150 hours approved by the board.

(b) If an applicant for renewal is uncertain whether the applicant's work or volunteer experience will constitute occupational therapy services under this section, the applicant may request board approval before submitting the application for license renewal.

(c) In this section, "occupational therapy services" includes work and volunteer service under a position title other than occupational therapist or occupational therapy assistant if the applicant documents that the position required the use of occupational therapy skills recognized by the board.

Authority: AS 08.84.010 AS 08.84.100

My questions to you would be:

- Is your employment billing for your time as occupational therapy services?
- Would your employer be willing to complete and attest to the statement on the attached form?

The 60 hours of professional practice over the licensing period does not have to be continuous. If you are providing on call employment at Maple Springs of Wasilla and your sporadic work totals to a minimum of at least 60 hours over the licensing period, that would meet the requirement.

You also have the option of doing 40 hours of additional continuing education under (B) above. This would be in addition to the normal 24 contact hours you are required to complete each licensing period under 12 AAC 54.710.

Please let me know if you have additional questions.

Best regards,



Sheri Ryan
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Effective May 1, 2025 – Physical Therapy Licensure Compact NOW OPERATIONAL through the [PT Compact Commission](#) for Alaska!

From: tommy class <tclass12@gmail.com>

Sent: Thursday, March 6, 2025 3:47 PM

To: Board of Physical and Occupational Therapy (CED sponsored) <physicalandoccupationaltherapy@alaska.gov>

Subject: Required 60 hours to maintain my state license

You don't often get email from tclass12@gmail.com. [Learn why this is important](#)

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Hello,

My name is Thomas Class. I am a COTA and have been practicing Occupational Therapy in skilled nursing from 2019 to 2024. On Jan 1st 2025 I started a new job as an activities of daily living instructor at the Alaska Center for the Blind and Visually Impaired. I was wondering if my current job is close enough to occupational therapy to count for the 60 hours required each two years to

maintain my license. I am responsible for providing curriculum based instructions for our clients to help them to achieve independence with ADL performance. I currently am also PRN at Maple Springs of Wasilla and have been putting in hours on my time off.

I am hoping that it is possible to count my current employment situation for said hours as the main purpose of OT is functional independence for our clients.

I would love to hear from you regarding this matter at your earliest convenience.

I can be best by phone at (907)354-8961 or by my work email tclass@alaskabvi.org. Thank you and I hope all is well.

Thomas Class

From: [Board of Physical and Occupational Therapy \(CED sponsored\) Myra](#)
To: [Desiree Olson](#)
Cc: [Ryan, Sheri J \(CED\)](#)
Subject: RE: Rules regarding NC OT's volunteering in Alaska for a Health Fair
Date: Friday, January 31, 2025 1:38:35 PM
Attachments:

Hello Myra,

I would recommend you seek out information from the Alaska Native Regional corporations “regarding needs or lack of screening and treatment in the villages”. I’ve provided a link below with contact information and map layout.

[AKNativeRegionalCorps](#)

Cheers!



Shane Bannarbie
Program Coordinator
Corporations, Business and Professional Licensing

shane.bannarbie@alaska.gov
Office: 907-269-6421
www.commerce.alaska.gov



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From: Board of Physical and Occupational Therapy (CED sponsored)
<physicalandoccupationaltherapy@alaska.gov>
Sent: Friday, January 31, 2025 1:10 PM
To: Myra Desiree Olson
Cc: Bannarbie, Shane R (CED) <shane.bannarbie@alaska.gov>
Subject: RE: Rules regarding NC OT's volunteering in Alaska for a Health Fair

Hello Myra,

That is outside of my knowledge base but I will certainly pass your question on to the Board as well as my supervisor and see what resources are available for that information to assist you with your endeavor.

Best regards,



Sheri Ryan
Licensing Examiner 3 Advanced
Board of Physical Therapy and Occupational Therapy
Board of Certified Direct-Entry Midwives
Athletic Trainers Program
Division of Corporations, Business and Professional Licensing

sheri.ryan@alaska.gov

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From: Myra Desiree Olson

Sent: Thursday, January 30, 2025 6:58 PM

To: Board of Physical and Occupational Therapy (CED sponsored)

<physicalandoccupationaltherapy@alaska.gov>

Subject: RE: Rules regarding NC OT's volunteering in Alaska for a Health Fair

Dear Sheri,

Thank you very much! That's encouraging! Do you know where to locate any data regarding needs or lack of screening and treatment in the villages? If you know of any sources or studies that have been done, we are interested in fleshing out what has been started and filling in the gaps.

Myra Desiree Olson

Walking Outside Foundation
4466 South Glenn Highway
Palmer, Alaska 99645
907-355-8641 phone/text

6458 Brantley Gordon Road
Denton, NC 27239

92-8704 Orchid Pkwy
Ocean View, Hawaii 96737-7008

4788 Vanover Ridge Road
Whitley City, KY 42653

907-355-8641 phone/text
walkingoutside@mtaonline.net

From: Board of Physical and Occupational Therapy (CED sponsored)
<physicalandoccupationaltherapy@alaska.gov>
Sent: Thursday, January 30, 2025 2:11 PM
To: Myra Desiree Olson
Subject: RE: Rules regarding NC OT's volunteering in Alaska for a Health Fair

Hello Myra,

That sounds like a wonderful event!!

Any therapist (PT/PTA or OT/OTA) practicing physical therapy or occupational therapy in the State of Alaska is required to have an active license. This program does not have inactive or retired status licenses.

We do have limited permits (120-consecutive day permits) available for visiting, non-resident therapists who have an active non-encumbered license in another state. You can find all our application forms on our website here →
<https://www.commerce.alaska.gov/web/cbpl/ProfessionalLicensing/PhysicalTherapyOccupationalTherapy/ApplicationsForms.aspx>

Any “temporary permit” is issued as part of an application for a permanent license application within this program.

You would need to contact the Audiologists and Speech-Language Pathologists Program desk at AudiologistAndSpeechLanguagePathologists@Alaska.Gov for more information regarding that license type.

Please let me know if I can be of more assistance regarding physical or occupational therapy.

Best regards,

Sheri Ryan
Licensing Examiner 3 Advanced



Board of Physical Therapy and Occupational Therapy
Board of Certified Direct-Entry Midwives
Athletic Trainers Program
Division of Corporations, Business and Professional Licensing

sheri.ryan@alaska.gov

Office: 907-269-6425 | Fax: 907-465-2974

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From: Myra Desiree Olson

Sent: Thursday, January 23, 2025 1:52 PM

To: Board of Physical and Occupational Therapy (CED sponsored)

<physicalandoccupationaltherapy@alaska.gov>

Subject: Rules regarding NC OT's volunteering in Alaska for a Health Fair

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Sheri,

We are 2 non-profit organizations, OT4KIDS Foundation and Walking Outside Foundation who wish to host Autism Health Screening Fairs in Alaska twice a year. We can find information showing a 2 week window where volunteer nurses and retired Physicians do not need an additional Alaska state license for this purpose but we are not able to find any rules for OT's, PT's and Speech Pathologists. Do they fall under the same rules? If not, will you help us find the volunteer or temporary rules for therapists? We appreciate any guidance you can provide.

Respectfully,

Myra Desiree Olson

Walking Outside Foundation

92-8698 Orchid Pkwy
Ocean View, Hawaii 96737-7008

4788 Vanover Ridge Road
Whitley City, KY 42653

907-355-8641 phone/text
walkingoutside@mtaonline.net