



## **AK PT/OT Board - Scope of Practices Committee Mtg - February 12, 2026**

Alaska Division of Corporations, Business and Professional Licensing

Videoconference

2026-02-12 08:00 - 10:00 AKST

### **Table of Contents**

<b>1. Call to Order/Roll Call.....</b>	<b>3</b>
Committee Members:	
Tori Daugherty	
Jonathan Gates	
PHY - Public Notice - Scope Committee Mtg - 02-12-2026.pdf.....	3
<b>2. Review/Approve Agenda</b>	
<b>3. Approve Minutes - 11/06/2025.....</b>	<b>4</b>
PHY - Scope of Practices Committee Mtg - Minutes - 11-06-2025 - DRAFT.pdf.....	4
<b>4. Public Comment</b>	
<b>5. NEW Board Correspondence</b>	
<b>A. OT Scope Questions.....</b>	<b>9</b>
- Vision Therapy PT/OT Scope Question - 10-28-2025 - draft response	
Vision Therapy - Scope question - PT OT - 10-28-2025_redacted.pdf.....	9
Response - Vision Therapy Scope Question - 10-28-2025 - draft.pdf.....	11
<b>B. PT Scope Questions.....</b>	<b>13</b>
- PTA Scope and Dry Needling Ruling Request - 10-31-2025 - draft response	
PTA Scope and Dry Needling Ruling - 10-31-2025-redacted.pdf.....	13
PTA Scope Ultramist Wound Care - 12-22-2025_redacted.pdf.....	16
Response 02-05-2026 - IERF - CWT6 for Foreign-Educated PTs.pdf.....	19
Response 02-05-2026 - Acceptance of FCCPT PTA Educational Evaluation - 01-15-2026.pdf.....	25
<b>C. Generic.....</b>	<b>28</b>
CAQH disclosure questions - 01-07-2026_redacted.pdf.....	28
<b>6. PT Scope Modernization Update</b>	

**7. OT Scope Modernization Update**

**8. Next Steps**

**9. Adjourn**



# AK PT/OT Board - Scope of Practices Committee

## Mtg - November 6, 2025 Minutes

Alaska Division of Corporations, Business and Professional Licensing

11/6/2025 8:00 AM AKST

Videoconference

***These are DRAFT minutes prepared by staff of the Division of Corporations, Business and Professional Licensing. They have not been reviewed or approved by the Board.***

### 1. Call to Order/Roll Call

Committee Members:

Tori Daugherty

Jonathan Gates

The Physical Therapy and Occupational Therapy Board Scope of Practices Committee meeting was called to order on Thursday, November 6, 2025 at 8:11 am by Tori Daugherty.

Roll call taken:

Committee members present: Tori Daugherty and Jonathan Gates.

Staff present: Shane Bannarbie, Project Coordinator 1 and Sheri Ryan, Licensing Examiner 3.

Guest: Kristen Neville, Manager State Affairs, AOTA and Kathryn Perez.

### 2. Review/Approve Agenda

**Tori Daugherty moved to accept the November 6, 2025 Scope of Practices committee meeting agenda as submitted. Motion seconded by Jonathan Gates. All in favor; none opposed. Motion passes unanimously.**

### 3. Approve Minutes - 08/01/2025

**Jonathan Gates moved to approve the August 11, 2025 Scope of Practices committee meeting minutes as written. Motion seconded by Tori Daugherty. All in favor; none opposed. Motion passes unanimously.**

### 4. Public Comment

Kristen Neville, State Affairs Manager with American Occupational Therapy Association (AOTA) expressed concern regarding wording being utilized in the PT Scope Modernization draft statutory language on "functional training and self-care". AOTA to attend PT Scope Modernization work group meeting scheduled 11/12/2025 and submit written comments.

## 5. Committee Schedule

Tori Daugherty expressed that she had a work conflict for the next scheduled Scope of Practices Committee meeting on 02/05/2026. Committee decided to move date to Thursday, November 12, 2025 at same time 8:00 am - 10:00 am.

Action Items:

Staff to change public noticing and website posting for February, 2026 Scope of Practices Committee meeting from 02/05/2026 to 02/12/2026.

## 6. NEW Board Correspondence

### A. OT Scope Questions

- Dry needling clarification - 07-29-2025 request - Ivy Caldwell. Committee discussed. Licensing examiner response dated July 29, 2025 confirmed. No additional response necessary.
- Vision Therapy Scope question - PT/OT - 10-28-2025 - Joy Backstrum. Committee discussed vision therapy and feels it is well within scope definitions AS 08.84.190 for both occupational therapy (3) and physical therapy (7) as part of comprehensive plan of care. Will recommend that provider consult payor for prior authorization requirements or co-management of plan of care with optometry. Committee feels board should not comment on employee/employer situations, business practice standards, or insurance requirements as not within purview of board. Tori Daugherty to write draft response for review/approval by full board through OnBoard.

**Action items:**

- Tori Daugherty to draft response for Vision Therapy PT/OT Scope question - 10-28-2025 as discussed.

### B. PT Scope Questions

- PTA Scope and Dry Needling Ruling Request - 10-31-2025 - Cassidy Pehrson. Previous discussions by the board state it is their intent that only physical therapists perform dry needling. Board position statement posted 06-16-2023 and dry needling regulation discussions as well as approved dry needling draft regulatory language from February, 2025 board meeting. All regulation committee and board discussion centered around constant evaluation requirements when performing dry needling and PTA definition per statute AS 08.84.190(6) that precludes a PTA from doing an evaluation.

- (6) “physical therapist assistant” means a person who assists in the practice of physical therapy or an aspect of physical therapy as initiated, supervised, and terminated by a licensed physical therapist; the responsibilities of a physical therapist assistant do not include evaluation;
- AK - CWT6 for Foreign-Educated PTs - 10-28-2025 – Requirement of which coursework tool is not written in statute or regulation but only listed in the application instructions. Board discussed at October 2-3, 2025 board meeting. Discussion of the board at that meeting was to change the interpretation of the instructions/process. Intent was that CWT equivalent to their graduation date (in place at time of graduation) or the newest one (CWT6), whichever is the applicant’s preference. While the board would permit use of the most current course work tool, they encourage the use of the course work tool that’s equivalent to the year the applicant graduated because that is the more lenient and achievable standard. Intent of the board not to be restrictive financially if the applicant had already received an evaluation using CWT6 due to another state’s requirements. Initial credentials evaluation – Alaska encourages use of the CWT in force at the time of graduation; if it’s a subsequent evaluation and happens to be CWT6, Alaska will accept it. Answer the same for PTA credentials evaluations. Staff to respond as discussed.

**Action Items:**

- Staff to forward any board minutes with discussion related to physical therapists only performing dry needling, board position statement and board approved draft dry needling regulatory language to Jonathan Gates to draft response for PTA Scope and Dry Needling Ruling Request - 10-31-2025.
- Staff to response to CWT6 for Foreign Educated PTs – 10-28-2025 as discussed.

C. Generic

- Request to Share Survey with Licensed Physical Therapists - 07-20-2025 - Matt Schumacher - Licensing Examiner response dated 07-21-2025 confirmed. No additional response required.
- Emergency Disaster Practice Privileges - 08-19-2025 - Megan Mitchell - National disaster declaration. Within Governor’s statutory authority when

state/national disaster is declared; Executive Order would declare requirements. Point to PT Compact privileges which allow for almost immediate licensure approval. Staff to respond to letter as discussed.

**Action Items:**

Staff to respond to Emergency Disaster Practice Privileges – 08-19-2025 as discussed.

**7. PT Scope Modernization Update**

Next set of PT scope modernization work group meetings scheduled for November 12, November 19, and November 26 from 11am – 1pm. National APTA and FSBPT representatives invited but still trying to confirm their participation. AOTA, AKOTA and APTA-AK representatives to participate. Discussed potential to ask other professional stakeholders to attend such as acupuncturists, chiropractors, primary care association, and medical association. Decision to wait to invite until related agenda items are discussed.

**8. OT Scope Modernization Update**

AKOTA working with their lobbyist David Parish. Potential sponsorship with House Labor and Commerce committee co-chair. Plan is to have bill sponsored by entire committee hopefully.

**9. Next Steps**

- Staff to change public noticing and website posting for February, 2026 Scope of Practices Committee meeting from 02/05/2026 to 02/12/2026.
- Tori Daugherty to draft response for Vision Therapy PT/OT Scope question - 10-28-2025 as discussed.
- Staff to forward any board minutes with discussion related to physical therapists only performing dry needling, board position statement and board approved draft dry needling regulatory language to Jonathan Gates to draft response for PTA Scope and Dry Needling Ruling Request - 10-31-2025 as discussed.
- AK - CWT6 for Foreign-Educated PTs - 10-28-2025 - Staff to respond as discussed.
- Staff to respond to Emergency Disaster Practice Privileges – 08-19-2025 as discussed.

**10. Adjourn**

The Alaska Physical Therapy and Occupational Therapy Scope of Practices Committee meeting was adjourned at 9:41 am on Thursday, November 6, 2025.

Next virtual meeting scheduled for February 12, 2026 at 8:00 am (rescheduled from February 5, 2026).

DRAFT

**From:** [Board of Physical and Occupational Therapy \(CED sponsored\)](#)  
**To:** [Joy Backstrum](#)  
**Subject:** RE: scope of practice  
**Date:** Tuesday, October 28, 2025 12:39:43 PM  
**Attachments:** [image003.png](#)  
[image004.png](#)  
[image005.png](#)

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Hello Joy,

Thank you for submitting this question if “vision therapy” is within scope for physical and occupational therapy. It will need to be referred to the Board of Physical Therapy and Occupational Therapy. Their next scheduled meeting is February 26-27, 2026. I will submit it to the Scope of Practices Committee to research for the board in the interim, but the board will likely not have a response as to whether “vision therapy” is within scope of practice for physical therapy or occupational therapy until March 2026.

With regards to your question if it is a “legal use of the 97000 codes”, the Physical Therapy and Occupational Therapy Board does not provide instructions related to requirements by funding sources, including insurance reimbursement. Please refer to the requirements as established by those entities for more direction. The board recommends consulting legal counsel for further assistance on this topic, if required.

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  
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**From:** Joy Backstrum  
**Sent:** Tuesday, October 28, 2025 12:07 PM  
**To:** Board of Physical and Occupational Therapy (CED sponsored)

<physicalandoccupationaltherapy@alaska.gov>

**Subject:** scope of practice

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To whom it may concern,

It has recently come to my attention that an Optometry practice in our community is hiring a PT and an OT, so that they can use the 97000 - CPT codes to bill insurance for "vision therapy."

I am wondering if providing "vision therapy" is within our scope of practice/ practice act, and if this is a legal use of the 97000 codes.

Joy Backstrum

Anchorage, AK



THE STATE  
*of* **ALASKA**  
GOVERNOR MIKE DUNLEAVY

**Department of Commerce, Community,  
and Economic Development**

**BOARD OF PHYSICAL THERAPY AND  
OCCUPATIONAL THERAPY**

P.O. Box 110806  
Juneau, Alaska 99811-0806  
Main: 907.269.6425  
Fax: 907.465.2974

[DATE]

Joy Backstrum – [email address]

Hello Joy,

On [date] the Physical Therapy and Occupational Therapy Board approved the following response to your request October 28, 2025 if “vision therapy” is within scope for physical and occupational therapy.

Thank you for reaching out to the board with your question and for your patience as we come to a decision.

The Board’s opinion is that an occupational therapy or physical therapy practitioner may treat vision. Providing therapy services to address vision is within a therapist’s scope of practice. This is supported by Sec. 08.84.190 (3) and (7), which define the scope of practice for physical therapy and occupational therapy.

This Board does not provide instructions related to requirements by funding sources, including insurance reimbursement. Please refer to the requirements as established by those entities for more direction.

This letter reflects the Board’s opinion on your question and is intended as guidance only. It does not replace legal advice or constitute a legal determination. The Board recommends consulting legal counsel for further assistance if required.

**References:**

Sec. 08.84.190. Definitions. In this chapter, unless the context otherwise requires,

(3) “occupational therapy” means, for compensation, the use of purposeful activity, evaluation, treatment, and consultation with human beings whose ability to cope with the tasks of daily living are threatened with, or impaired by developmental deficits, learning disabilities, aging, poverty, cultural differences, physical injury or illness, or psychological and social disabilities to maximize independence, prevent disability, and maintain health; “occupational therapy” includes  
(A) developing daily living, play, leisure, social, and developmental skills;

(B) facilitating perceptual-motor and sensory integrative functioning;  
(C) enhancing functional performance, prevocational skills, and work capabilities using specifically designed exercises, therapeutic activities and measure, manual intervention, and appliances;  
(D) design, fabrication, and application of splints or selective adaptive equipment;  
(E) administering and interpreting standardized and nonstandardized assessments, including sensory, manual muscle, and range of motion assessments, necessary for planning effective treatment; and  
(F) adapting environments for the disabled;

(7) "physical therapy" means the examination, treatment and instruction of human beings to detect, assess, prevent, correct, alleviate and limit physical disability, bodily malfunction, pain from injury, disease and other bodily or mental conditions and includes the administration, interpretation and evaluation of tests and measurements of bodily functions and structures; the planning, administration, evaluation and modification of treatment and instruction including the use of physical measures, activities and devices for preventive and therapeutic purposes; the provision of consultative, educational and other advisory services for the purpose of reducing the incidence and severity of physical disability, bodily malfunction and pain; "physical therapy" does not include the use of roentgen rays and radioactive materials for diagnosis and therapeutic purposes, the use of electricity for surgical purposes, and the diagnosis of disease.

**Source:** [Alaska Physical Therapy and Occupational Therapy Statutes and Regulations](#) – March 2025

Please let us know if you have additional questions.

Sincerely,

Sheri Ryan  
Licensing Examiner 3

**From:** [Board of Physical and Occupational Therapy \(CED sponsored\)](#)  
**To:** [Kassidy Pehrson](#)  
**Subject:** RE: Inquiry Regarding PTA Scope and Dry Needling Ruling  
**Date:** Tuesday, November 4, 2025 8:52:42 AM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)

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Hello Kassidy,

I have received your request. I will forward it to the Board of Physical Therapy and Occupational Therapy for review. All board discussion must be done in publicly noticed meetings. The next regularly scheduled board meeting is February 26-27, 2026. A formal response will be forwarded as quickly as possible. It is highly unlikely you will have a formal board position before the start of the certification course in December, 2025.

The board adopted a position statement regarding dry needling for physical therapy in June, 2023. It is posted on our website under [Frequently Asked Questions](#). The board was very specific in their response that dry needling was supported in statute 08.84.190 when performed by **physical therapists**.

**May I perform dry needling under my physical therapy license?**

The Board of Physical Therapy and Occupational Therapy has determined that the physical therapy scope of practice description in statute 08.84.190 supports dry needling by **physical therapists** in the state of Alaska.

Please see the [PT Dry Needling Position Statement](#) adopted 06-16-2023 for more information.

In the interim, you can read through the [board minutes](#) if you would like to review the many past discussions of the board regarding the topic of physical therapist assistants performing dry needling as the board worked through their draft regulations on dry needling to put forth for public comment. The final draft regulations were included in [the Feb, 2025 Public Packet Day 1](#) and the motion to accept was in the minutes from the [02/28/2025 board meeting](#) item agenda #7A – Regulations Project – Review Draft Language – PT/OT Dry Needling. These regulations have not moved forward yet due to [Governor Dunleavy's Administrative Order 358](#) which halted work on all regulations projects. The Board of Physical Therapy and Occupational Therapy's requested a waiver from AO358 to move their dry needling regulations project forward ([August 7, 2025 board meeting](#)). The board is awaiting a decision on that request.

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

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**From:** Cassidy Pehrson  
**Sent:** Friday, October 31, 2025 10:23 AM  
**To:** Board of Physical and Occupational Therapy (CED sponsored)  
<physicalandoccupationaltherapy@alaska.gov>  
**Subject:** Inquiry Regarding PTA Scope and Dry Needling Ruling

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Good morning Sheri,

My name is Cassidy Pehrson, and I am a Physical Therapist Assistant with a strong interest in dry needling. Alec Kay recommended that I reach out to you.

I would like to express my interest in requesting a formal ruling and interpretation from the licensing board regarding PTAs performing dry needling. Could you please advise me on the appropriate channels to pursue this inquiry and let me know what information or documentation you may need from me?

Additionally, could you provide a general estimate of the timeline for when such a ruling might be made? I am considering enrolling in a certification course this December, though I understand if the process is expected to extend beyond that timeframe.

Thank you for your guidance,

Kassidy Pehrson, PTA

**From:** [Board of Physical and Occupational Therapy \(CED sponsored\)](#)  
**To:** [Thomas Eash](#)  
**Subject:** RE: CBPL Contact Form Submission  
**Date:** Tuesday, December 23, 2025 12:15:00 PM  
**Attachments:** [Response 09-27-2024 - Scope of Practice PT - Wound Debridement - 12-07-2023.pdf](#)  
[image001.png](#)  
[Response 09-27-2024 - Wound Debridement Regulations - 2-6-2024.pdf](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)

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Hello Mr. Eash,

The Board of Physical Therapy and Occupational Therapy has answered the question about the practice of wound debridement by physical therapists in Alaska but not specifically the practice of “ultramist wound care” by physical therapist assistants. I will have to refer your specific question to the board to address. The next board meeting is scheduled for February 26-27, 2026. As soon as a response is available, it will be forwarded.

In the interim, here is some information that may be of assistance.

Both chemical and sharps wood debridement are considered an entry level, fundamental skill for both physical therapists and occupational therapists. The ability to perform wound debridement **for physical therapists** is found within “physical measures” of the scope definition of 08.84.190(7). These board response letters attached equate to a board opinion of statutory language as wound debridement is not defined within regulation.

The scope of practice of physical therapist assistant is defined in AS 08.84.190(6). PTAs are specifically excluded from performing evaluations. PTAs assist with implementing treatment plans developed by the physical therapist. Supervision of a PTA is defined in regulation 12 AAC 54.510. Physical therapists must ensure any PTA under their supervision has the proper training for any delegated tasks as part of the written plan of care.

**Sec. 08.84.190. Definitions.** In this chapter, unless the context otherwise requires,

- (1) "board" means the State Physical Therapy and Occupational Therapy Board;
- (2) "occupational therapist" means a person who practices occupational therapy;
- (3) "occupational therapy" means, for compensation, the use of purposeful activity, evaluation, treatment, and consultation with human beings whose ability to cope with the tasks of daily living are threatened with, or impaired by developmental deficits, learning disabilities, aging, poverty, cultural differences, physical injury or illness, or psychological and social disabilities to maximize independence, prevent disability, and maintain health; "occupational therapy" includes
  - (A) developing daily living, play, leisure, social, and developmental skills;
  - (B) facilitating perceptual-motor and sensory integrative functioning;
  - (C) enhancing functional performance, prevocational skills, and work capabilities using specifically designed exercises, therapeutic activities and measure, manual intervention, and appliances;
  - (D) design, fabrication, and application of splints or selective adaptive equipment;
  - (E) administering and interpreting standardized and nonstandardized assessments, including sensory, manual muscle, and range of motion assessments, necessary for planning effective treatment; and
  - (F) adapting environments for the disabled;
- (4) "occupational therapy assistant" means a person who assists in the practice of occupational therapy under the supervision of an occupational therapist;
- (5) "physical therapist" means a person who practices physical therapy;
- (6) "physical therapist assistant" means a person who assists in the practice of physical therapy or an aspect of physical therapy as initiated, supervised, and terminated by a licensed physical therapist; the responsibilities of a physical therapist assistant do not include evaluation;
- (7) "physical therapy" means the examination, treatment and instruction of human beings to detect, assess, prevent, correct, alleviate and limit physical disability, bodily malfunction, pain from injury, disease and other bodily or mental conditions and includes the administration, interpretation and evaluation of tests and measurements of bodily functions and structures; the planning, administration, evaluation and modification of treatment and instruction including the use of physical measures, activities and devices for preventive and therapeutic purposes; the provision of consultative, educational and other advisory services for the purpose of reducing the incidence and severity of physical disability, bodily malfunction and pain; "physical therapy" does not include the use of roentgen rays and radioactive materials for diagnosis and therapeutic purposes, the use of electricity for surgical purposes, and the diagnosis of disease.

**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

Source: [Physical Therapy and Occupational Therapy Statutes and Regulations – March 2025](#).

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

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**From:** Occupational, License (CED sponsored) <[license@alaska.gov](mailto:license@alaska.gov)>  
**Sent:** Monday, December 22, 2025 12:48 PM  
**To:** Board of Physical and Occupational Therapy (CED sponsored) <[physicalandoccupationaltherapy@alaska.gov](mailto:physicalandoccupationaltherapy@alaska.gov)>  
**Subject:** FW: CBPL Contact Form Submission

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**From:** Corporations, Business & Professional Licensing <[no.mail.dcced@alaska.gov](mailto:no.mail.dcced@alaska.gov)>  
**Sent:** Monday, December 22, 2025 12:41 PM  
**To:** Occupational, License (CED sponsored) <[license@alaska.gov](mailto:license@alaska.gov)>  
**Subject:** CBPL Contact Form Submission

Applicant Name: Thomas Eash  
Contact Name: Tom  
Contact Email:  
License Number:  
License Program: Physical therapy  
Contact Reason: I have another question not listed here.  
Additional Information: Looking for clarifications, are PTA's able to perform ultramist wound care?

**From:** [Board of Physical and Occupational Therapy \(CED sponsored\)](#)  
**To:** [Andrea Benzion](#)  
**Subject:** RE: AK - CWT6 for Foreign-Educated PTs?  
**Date:** Thursday, February 5, 2026 8:31:27 AM  
**Attachments:** [image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)  
[image006.png](#)  
[image007.png](#)  
[image001.png](#)  
[image013.png](#)  
[image014.png](#)

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Hello Ms. Benzion,

Alaska's statutes regarding Foreign Educated applicants can be found in AS 08.84.032 and regulations in 12 AAC 54.040 (examination) and 12 AAC 54.110 (credentials). Source: [AK PT/OT Statutes and Regulations](#) – March 2025.

The criteria for which course work tool (CWT) to use is not written in statute or regulation. It has been the board's guidelines for years for credentialing services when assessing an applicant's educational program for AS 08.84.032 to use the CWT in effect at the time of graduation. See the instructions found on the application.

**CREDENTIAL EVALUATION:**

Before applying, you must have your foreign education evaluated by a credentialing provider who uses the qualifying Course Work Tool. If the review determines your education is substantially equivalent to a CAPTE accredited physical therapy program at the time of graduation you may then submit your application.

Due to recent questions from applicants, the board came out with a clarification to that policy at their October 2025 board meeting and I will be amending the application to include.

To satisfy the requirements of **AS 08.84.032**, credentialing services must evaluate an applicant's educational program using the **Coursework Tool (CWT)** that was in effect at the time of their graduation. However, if a more recent (higher) CWT version has already been used and the applicant's program was found to be "substantially equivalent" (meets expectations), the Alaska Board will accept that newer standard. The Board will not require an additional evaluation under a different CWT version in these cases, as its intention is to prevent undue financial burdens and eliminate unnecessary barriers to licensure for foreign-educated professionals.

Example, if CWT3 was in effect at the time of graduation, and the applicant had a credentials evaluation done utilizing CWT6 for another state where their education was found to be substantially equivalent, Alaska will accept the credentials evaluation utilizing CWT6.

The board discussion related to PTAs has been that the same situation would apply. Credentialling services must evaluate a PTA applicant's educational program using the coursework tool in effect at the time of graduation if conducting an initial evaluation. However, the board will accept the PTA Tool 2 if it has already been used and the applicant's educational program was found to be "substantially equivalent" for another state. Again, it is the Alaska Board's intention to prevent undue financial burdens and eliminate unnecessary barriers to licensure for foreign-educated professionals.

I hope this provides the information you need. Please let me know if you have any 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  
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**From:** Andrea Benzion <Abenzion@ierf.org>  
**Sent:** Tuesday, October 28, 2025 10:22 AM  
**To:** connie.petz@alaska.gov; Board of Physical and Occupational Therapy (CED sponsored) <physicalandoccupationaltherapy@alaska.gov>  
**Subject:** AK - CWT6 for Foreign-Educated PTs?

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Dear Ms. Ryan, Dear Ms. Petz,

I'm following up on a conversation between Ms. Petz and my former colleague, Emily Tse (please see below).

We are writing to seek clarification about whether CWT6 is to be used for all foreign PT graduates (regardless of the time of graduation) or only for graduates on January 1, 2017 and after?

Also, do you distinguish between those applicants who seek licensure by endorsement/reciprocity (that are licensed in another state) and those that seek licensure by examination (and have not been licensed in another state)?

Would the same be applied for the new PTA tool as well? (PTA2)

We appreciate your guidance and look forward to your response.

Sincerely,



**Andrea Ben-Zion**  
Allied Health Case Specialist  
International Education Research Foundation

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Email: [alliedhealth@ierf.org](mailto:alliedhealth@ierf.org)  
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LinkedIn: [linkedin.com/company/ierf/](https://linkedin.com/company/ierf/)  
Mailing Address: 10736 Jefferson Blvd. #532, Culver City, CA 90230

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**From:** Emily Tse <[etse@ierf.org](mailto:etse@ierf.org)>  
**Sent:** Monday, March 22, 2021 12:59 PM  
**To:** [connie.petz@alaska.gov](mailto:connie.petz@alaska.gov)  
**Subject:** CWT6 for Foreign-Educated PTs?

Hi Connie!

I hope all continues to be well with you and the Alaska Board. I just wanted to resend my email below in case it was missed.

Many thanks again for your time.

**Emily Tse** *Director of Evaluations*  
International Education Research Foundation  
phone: 310-258-9451 extension 131  
address: P.O. Box 3665 Culver City, CA 90230  
email: [etse@ierf.org](mailto:etse@ierf.org)



web: [www.ierv.org](http://www.ierv.org)



---

**From:** Emily Tse  
**Sent:** Saturday, March 6, 2021 4:44 PM  
**To:** Petz, Connie J (CED) <[connie.petz@alaska.gov](mailto:connie.petz@alaska.gov)>  
**Subject:** RE: CWT6 for Foreign-Educated PTs?

Hi Connie,

I hope this email finds you safe and well amidst the pandemic.

We are processing an application for a PT who completed her studies in Poland in 2018 and is applying to the Alaska Board. To ensure that our records are up-to-date, we would like to inquire:

1)

Has the Board adopted CWT 6 for all applicants, **regardless of** the period of study?

2)

Or has the Board adopted CWT 6, to be used along with the other Retro Tools, **based on** the period of study?

3)

Would the same be applied for the new PTA tool as well? (PTA2)

Thank you for your time and counsel!

Regards,  
Emily Tse  
Director of Evaluations  
International Education Research Foundation (IERF)  
[www.ierv.org](http://www.ierv.org)

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**From:** Petz, Connie J (CED) <[connie.petz@alaska.gov](mailto:connie.petz@alaska.gov)>  
**Sent:** Monday, December 19, 2016 3:48 PM  
**To:** Emily Tse <[etse@ierf.org](mailto:etse@ierf.org)>  
**Subject:** RE: NEW FSBPT CWT for Foreign-Educated PTs

Hi, Our board will discuss on January 18, 2017.

Thanks, Connie Petz, Licensing Examiner

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**From:** Emily Tse [<mailto:etse@ierf.org>]  
**Sent:** Monday, December 19, 2016 2:33 PM  
**To:** Emily Tse  
**Subject:** NEW FSBPT CWT for Foreign-Educated PTs

Dear Board Member,

I just wanted to follow up and inquire if the Board has made any decisions regarding CWT6 as well as the new PTA tool (see email below).

Wishing everyone a bright and brilliant new year!

Regards,  
Emily Tse  
Director of Evaluations  
International Education Research Foundation (IERF)  
[www.ierf.org](http://www.ierf.org)



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**From:** Emily Tse  
**Sent:** Friday, September 30, 2016 1:46 PM  
**To:** Emily Tse <[etse@ierf.org](mailto:etse@ierf.org)>  
**Subject:** NEW FSBPT CWT for Foreign-Educated PTs

Dear Board Member,

IERF is an agency approved by your Board to provide credentials evaluation reports for foreign-trained PTs and PTAs. The Federation of State Boards of Physical Therapy (FSBPT) is introducing CWT6 as well as a new PTA tool, effective January 1, 2017. For this reason, we are emailing to inquire after the Board's position:

1.

Do you anticipate adopting the new tools and, if so, what will the effective date(s) be?

2.

For PT licensure, IF your Board is still using the Retro Tools, we would be the timeframes (graduation dates) that CWT5 and CWT6 should be used against? For example, CWT4 is intended for graduates between 1998 and June 30, 2009, whereas CWT 3 is for graduates between 1992 and 1997. However, timeframes have not been specified for CWT5 and CWT6. Do you have specific timeframes you would like used for CWT5 and CWT6?

We thank you for your counsel and look forward to hearing from you.

Regards,



**Emily Tse** Director of Evaluations, International Education Research Foundation

**phone:** (310) 258.9451, extension 131

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**web:** [www.i erf.org](http://www.i erf.org)

**email:** [etse@ierf.org](mailto:etse@ierf.org)



**From:** [Board of Physical and Occupational Therapy \(CED sponsored\)](#)  
**To:** [Deepanshu Rattan](#)  
**Subject:** RE: PTA Licensure – Acceptance of FCCPT PTA Educational Evaluation  
**Date:** Thursday, February 5, 2026 12:32:00 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)

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Hello Deepanshu,

Alaska's statutes regarding Foreign Educated applicants can be found in AS 08.84.032 and regulations in 12 AAC 54.040 (examination) and 12 AAC 54.110 (credentials). Source: [AK PT/OT Statutes and Regulations](#) – March 2025.

**Sec. 08.84.032. Foreign-educated applicants.** (a) To be eligible for licensure by the board as a physical therapist or physical therapist assistant, an applicant who is a graduate of a school of physical therapy that is located outside the United States shall

- (1) have completed, to the satisfaction of the board, a resident course of study and professional instruction substantially equivalent to a professional physical therapy education program that is accredited by a board-approved national accreditation agency in the United States;
- (2) have completed, to the satisfaction of the board, an internship under the continuous direction and immediate supervision of a physical therapist in an institution that ordinarily provides physical therapy and is approved by the board, for that period of time specified by the board, and furnish documentary evidence of compliance with this paragraph;
- (3) pass an examination recognized by the board that measures the competence of the applicant in the English language if the applicant's physical therapist or physical therapist assistant education program was not taught in English;
- (4) have met applicable requirements under 8 U.S.C. 1101 – 1503 (Immigration and Nationality Act), unless a United States citizen;
- (5) pass the examination approved by the board under AS 08.84.030(a)(2);
- (6) pay the fee required under AS 08.84.050;
- (7) meet additional qualifications for licensure established in regulations adopted by the board under AS 08.84.010(b); and
- (8) have been fingerprinted and have provided the fees required by the Department of Public Safety under AS 12.62.160 for criminal justice information and a national criminal history record check; the fingerprints and fees shall be forwarded to the Department of Public Safety to obtain a report of criminal justice information under AS 12.62 and a national criminal history record check under AS 12.62.400.

The FE application for PTAs by examination can be found [HERE](#).

The criteria for which CWT to use is not written in statute or regulation. It has been the board's guidelines for years for credentialing services when assessing an applicant's educational program for AS 08.84.032 to use the CWT in effect at the time of graduation. See the instructions found on the application.

**CREDENTIAL EVALUATION:**

Before applying, you must have your foreign education evaluated by a credentialing provider who uses the qualifying Course Work Tool. If the review determines your education is substantially equivalent to a CAPTE accredited physical therapy program at the time of graduation you may then submit your application.

The board recently came out with a clarification to that policy.

The board's guidelines for credentialing services when assessing an applicant's educational program for AS 08.84.032 is to use the CWT in effect at the time of graduation OR if a higher CWT has been previously performed and the applicant meets the expectations, the Alaska board will not require that an additional credentials evaluation be completed utilizing a different standard and will accept the newer course work tool standard. Example, if CWT3 was in effect at the time of graduation, and the applicant had a credentials evaluation done utilizing CWT6 for another state, Alaska will accept the credentials evaluation utilizing CWT6. It is not the board's intention to create barriers to licensure or undue financial burden to foreign-educated applicants.

The board discussion related to PTAs has been that the same situation would apply. Credentialing services must evaluate a PTA applicant's educational program using the coursework tool in effect at the time of

graduation if conducting an initial evaluation. However, the board will accept the PTA Tool 2 if it has already been used and the applicant's educational program was found to be "substantially equivalent" for another state. Again, it is the Alaska Board's intention to prevent undue financial burdens and eliminate unnecessary barriers to licensure for foreign-educated professionals.

**Alaska always recommends that applicants have their foreign education evaluated by a credentialing provider before applying.** You will need to have a copy of the report sent to Alaska directly from FCCPT.

I would like to bring your attention to AS 08.84.032(a)(1) and 12 AAC 54.040(c). Alaska requires that foreign-educated physical therapists and physical therapist assistants, complete a 6-month **post-graduate** internship in Alaska under the supervision of an Alaska licensed physical therapist. This has been a barrier for some individuals. The board is aware of this situation and has been in a regulations project for the past 2 years to remove this hurdle but it still exists for now.

Regarding AS 08.84.032(a)(3), Alaska has defined the English proficiency examination in 12 AAC 54.110(6) as verification of achieving a passing NPTE score. You are not required to take the TOEFL in Alaska.

I hope this provides you with the information needed. Please feel free to reach out with 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

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Effective May 1, 2025 – Physical Therapy Licensure Compact NOW OPERATIONAL

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**From:** Deepanshu Rattan  
**Sent:** Thursday, January 15, 2026 9:30 AM  
**To:** Board of Physical and Occupational Therapy (CED sponsored) <[physicalandoccupationaltherapy@alaska.gov](mailto:physicalandoccupationaltherapy@alaska.gov)>  
**Subject:** PTA Licensure – Acceptance of FCCPT PTA Educational Evaluation

**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.

Dear Alaska Board of Physical Therapy,

I am a foreign-educated physical therapist seeking licensure as a Physical Therapist Assistant (PTA) in your state. Before I submit my credential evaluation with FCCPT, I would like to confirm.

Does your board **accept the FCCPT PTA Educational Equivalency Review (PTA-EER)** for foreign-educated

applicants whose entry-level education was in physical Therapy?

If yes, are there any additional requirements or limitations I should be aware of?

Thank you for your time and guidance.

Sincerely,

Dipanshu Rattan

**From:** [Board of Physical and Occupational Therapy \(CED sponsored\)](#)  
**To:** [Chrissie Thornton](#)  
**Subject:** RE: Question regarding CAQH disclosure questions  
**Date:** Friday, January 9, 2026 8:42:44 AM  
**Attachments:** [image002.png](#)  
[image003.png](#)  
[image004.png](#)

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Hello Chrissie,

Credentialing can be very frustrating! I apologize but I cannot provide much assistance. My only suggestion would be to reach out to Premera and ask to speak with a supervisor. Automated systems don't account for every situation.

Alaska made no adverse action reports to the National Practitioner Data Bank (NPDB) regarding your temporary permit or permanent license #229717. Your license has always been and is currently in good standing.

You were required to work under supervision while your temporary permit was in place from 09/15/2024 – 10/22/2024 and waiting to take your initial OTR certification. To my knowledge, this information is not reported to the National Practitioner Data Bank as any type of “adverse action”. The NPDB can pull our licensing files like any other entity as it is public information.

Credentialing and insurance issues are outside the regulatory purview of the Board of Physical Therapy and Occupational Therapy. The Board does not provide instructions related to requirements by third parties, including insurance or credentialing issues. Please refer to the requirements as established by those entities for more direction. I recommend consulting legal counsel for further assistance if required.

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  
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Effective May 1, 2025 – Physical Therapy Licensure Compact NOW OPERATIONAL

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**From:** Chrissie Thornton  
**Sent:** Wednesday, January 7, 2026 10:45 AM  
**To:** Board of Physical and Occupational Therapy (CED sponsored)  
<physicalandoccupationaltherapy@alaska.gov>  
**Subject:** Question regarding CAQH disclosure 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.

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Good morning Ms. Ryan,

I have been attempting to get credentialled with Premera Blue Cross as a provider. When I initially applied for OT licensure, I got a temporary license contingent on passing the NBCOT. The following month I passed the board and my license was automatically updated. When I view my license online it states this under the section titled “notes” and clearly states there have been no “actions” against my license. I have explained this to Premera and provided a copy of my license. However, they continue to insist I change my responses to disclosure questions on the CAQH and provide a letter of explanation for “unfavorable disclosure” responses (indicating “yes”). The first question does include the word “restricted” however the context of the question presents as an action of discipline (including the words reprimanded, revoked, suspended etc), which is not why my initial license was limited. Especially considering they want a letter to explain my “unfavorable disclosure”. This feels as if I am being penalized for simply applying for a temporary license. I am wondering how to proceed with this. I have enclosed their email and the wording of the disclosure questions. I understand that Premera would get a letter of explanation, however I don’t like that my CAQH would indicate a “yes” to any of these questions without explanation, which I feel implies it was disciplinary.

If you have any information to offer please let me know.

Thank you,  
Chrissie Thornton, OTD, OTR/L