



# AK PT/OT Board - Regulations Committee Mtg - December 19, 2025 Minutes

Alaska Division of Corporations, Business and Professional Licensing

12/19/2025 9:00 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:

Valerie Phelps

Eliza Ellsworth

Tori Daugherty

The Physical Therapy and Occupational Therapy Board Regulations Committee meeting was called to order on Friday, December 19, 2025 at 9:05 am by Valerie Phelps.

Roll call taken:

Committee members present: Valerie Phelps, Eliza Ellsworth, and Tori Daugherty.

Staff present: Sheri Ryan, Licensing Examiner.

Guest: Kristen Neville, State Affairs Manager, AOTA and Mitchell St. Clair, DPT

## 2. Review/Approve Agenda

**Tori Daugherty motioned to approve agenda for the December 19, 2025 PHY Regulations Committee meeting as written. All in favor; none opposed. Motion passes unanimously.**

## 3. Approve Minutes - 09/26/2025

**Tori Daugherty motioned to approve the minutes from the September 26, 2025 PHY Regulations Committee meeting as submitted. Eliza Ellsworth abstained as she was not a member of the committee at the time and had not reviewed the minutes. Abstention approved. Valerie Phelps seconded the motion. Tori Daugherty and Valerie Phelps voted in favor; none opposed. Motion passes by majority.**

## 4. Public Comment

Mitchell St. Clair attended the meeting and gave public comment. Stated he did not have anything additional to written comment submitted. Committee member Tori Daugherty

pointed out roentgen ray change request in AS 08.84.190(7) is a statutory change and AO360 Reform Plan is exclusive to regulatory changes. Referred Dr. St. Clair to PT Scope of Practices Work Group where board is working to make modernizations to this language and to ability of physical therapists and occupational therapist to order imaging.

## 5. Regulations Projects

### A. AO360 Regulation Reduction Plan

11/03/2025 - The baseline number of requirements for PHY is 333. 316 of these requirements are from the regulations, and 17 requirements are from documents adopted by reference in the regulations. The 25% target is against the 333 number.

**25% of 316 = Minimum 79 reductions in regulations to meet goal.**

#### i. PHY AO360 DRAFTS

Committee reviewed AO 360 Reform Plan. Licensing Examiner inputted previous regulations projects delayed by AO358 related to dry needling for PT and OT; internship requirements for foreign educated applicants; NPTE passing rate for exams taken prior to 1991; OT licensing requirements; PT by Exam; SP74 - PT Licensure Compact; Expanding Armed Forces to include Space Force; Jurisprudence Questionnaire passing rate; Records retention; Occupational Therapy renewal requirement clarification; license display requirement update; license verification requirement clarification; name and address clarification; and Foreign educated occupational therapy applicants so committee members could see impact (additions and reductions) would have on regulations.

Committee discussed several over-arching topics in need of research

- Does x # of continuing education units make a better therapist? Is there research to support a baseline number?
- Principles of Practices adopted in 2015. Has not been updated. Why is this needed? Could this be a guidance document? Would adopting national standards be better?
- 60 hours of work experience required for applicants by credentials - why? Research to support?

2 states - NJ and HI do not require CE to renew a license. CE is required to be part of the OT compact.

Code of Ethics is referenced in **AS 08.84.120 Refusal, revocations, and suspension of license; discipline (4) is guilty, in the judgement of the board, of gross negligence or malpractice or has engaged in conduct contrary to the recognized standards of ethics of the physical therapy profession or the occupational therapy profession;**

[2025 AOTA Occupational Therapy Code of Ethics](#) is accessible to the public

[APTA Physical Therapy Code of Ethics](#) is accessible to the public.

Document to be updated effective January 1, 2026.

Committee discussed AS 08.84.120 and need for statute to have a regulation in the form of the “Principles of Practice”. Statute clearly defines actions that licenses can be sanctioned for. Decision to recommend repealing adoption of Principles of Practice and not adopting as guidance document. Repeal 12 AAC 54.500(c) and 12 AAC 54.500(d) for physical therapy and 12 AAC 54.800(a) for occupational therapy that adopt Principles of Practice.

Several states have an active practice requirement; most do not.

ii. Resources

Committee reviewed scoring document provided by the Division of regulations and document adopted by reference.

Break 10:18 am; meeting resumed at 10:30 am.

Roll call taken:

Committee members present: Valerie Phelps, Eliza Ellsworth, and Tori Daugherty.

Staff present: Sheri Ryan, Licensing Examiner.

Guest: Kristen Neville, State Affairs Manager, AOTA

Reviewed AO 360 Reform Plan. Discussed requirement of Jurisprudence (JP) Questionnaire. Previous SB74 Regulation Project was going to change from submission of questionnaire to requirement of passing score of 80%. Discussion at length of requirement of JP for both initial licensure and renewal for PT and OT. Recommendation to remove Jurisprudence Questionnaire requirement throughout regulations.

After review initial AO 360 Reform Plan, committee decided to go through regulations line by line and look for additional modernizations and reductions that could be made.

Discussion regarding initial licensure requirements and Professional Reference. No time limit on relationship in current regulation – could be from five, ten, twenty years ago. Employment liability normally only allows employer to verify employment dates without negative comments. Discussion if professional reference would be able to provide negative information intended to weed out applicants that board would have authority to deny licensure. Recommendation to remove Professional Reference requirement throughout regulations.

Continued discussion regarding initial licensure requirements and Verification of Working Experience – 60 hours of physical therapy or occupational therapy services for initial licensure by credentials. Discussed barrier to licensure that this requirement has caused for some applicants. Applicants have valid license to practice PT or OT in another state but because they cannot meet AK active practice requirement and conflict with AS 08.84.150 License required; exceptions for completion of 150-hour internship, no pathway for an AK license exists other than retaking national boards. Applicant would have the option of applying for Limited Permit if they do not meet residency requirements to get 60 hours of work experience as work around. Recommendation to remove 60 hours of physical therapy or occupational therapy services – active practice requirement - for initial licensure by credentials throughout regulations.

Stopped at 12 AAC 54.400 Physical Therapy License Renewal Requirements. Committee to start discussion on Continuing Education at January 8, 2026 meeting. Discussed Continuing Competency Committee goals and potential conflicts with AO 360 Reform Plan. Next CCC meeting scheduled for Thursday, January 23, 2025. Valerie Phelps to attend to provide guidance.

## 6. Next Steps

1. Valerie Phelps to attend PHY Continuing Competency Committee meeting on January 23, 2025 at 7:30 am to help new committee members align with AO360 plans.
  2. Staff to update AO 360 Reform plan and remove requirement of Jurisprudence Questionnaire throughout regulations. Renewal requirement already proposed removal as part of SB74 draft of PT/OT.
  3. Staff to update AO 360 Reform Plan and remove requirement of Professional Reference for initial licensure throughout regulations.
  4. Staff to update AO 360 Reform Plan and remove requirement of verification of 60 hours of work experience (physical therapy and occupational therapy) for initial licensure throughout regulations.
7. Adjourn

The Physical Therapy and Occupational Therapy Board Regulations Committee meeting was adjourned at 12:01 pm on Friday, December 19, 2025.

Next meetings scheduled for Friday, January 9, 2026 at 9:00 am and Friday, January 23, 2026 at 9:00 am specific to the AO 360 Reform Plan.