



May 6, 2020

Pennsylvania to Allow Students About to Graduate from Physical Therapist and Physical Therapist Assistant Programs During COVID-19 Emergency to Take Licensure Examination Prior to Graduation

To practice as a physical therapist (PT) in the United States, one must successfully complete a physical therapist education program accredited by the Commission on Accreditation in Physical Therapy Education (CAPTE) and then pass a national PT licensure examination. For a physical therapist assistant (PTA), a two-year associate degree from a CAPTE-accredited program is required, along with passage of the national PTA licensure exam. Each education program consists of a didactic coursework portion and a clinical experience/competency portion.

Many students have completed the didactic portion of their education and were in the process of completing the clinical competency portion when the COVID-19 emergency was declared. Because of the emergency, these students were sent home from their clinical placements (health systems, private practices and other clinical sites). Due to the dynamic nature of the pandemic, it is uncertain when exactly the students will be able to return to finish their clinical internships.

The current regulations of the State Board of Physical Therapy prohibit PT and PTA students from sitting for their national licensure examinations until they have graduated from their respective education programs. This presents a problem for students who are approaching graduation in the wake of the COVID-19 emergency who have been unable to complete the clinical portion of their education.

These unique timing issues have a cascading effect: students, faculty and mentors are concerned about the issue of fixed-date testing models and the licensure exam application process. In turn, plans and applications to take the licensure exam later in the calendar year due to the unavoidable delays brought on by the emergency raise numerous challenges – from availability of seats in testing locations, to employment, to managing patients/clients, and so forth.

Prior to the pandemic, the Board had begun the process of revising its regulations to allow PT/PTA students to take the licensure examination up to 90 days prior to graduation from a

CAPTE-accredited program. This regulation is proceeding through the formal rulemaking process and has not yet been approved for promulgation.

Therefore, the Department sought, and the Governor approved, a waiver consistent with the direction the Board is already moving with its revised regulation, namely, that **the graduation-before-licensure-examination requirement is temporarily suspended for the duration of the COVID-19 emergency. The waiver allows PT and PTA students who have completed their didactic education but have not yet completed their clinical education to take their national licensure examinations up to 180 days prior to graduation.**

Extending the number of days to 180 for the purpose of this waiver (as compared to the 90 days proposed in the rulemaking package) provides greater flexibility to account for the uncertain nature of the pandemic.

To effectuate this waiver, the CAPTE-accredited program director (or designee) shall be required to certify that the student has (or will have) successfully completed all didactic educational requirements prior to the examination date and that the student is scheduled to graduate within 180 days.