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Pennsylvania Changes Supervision Requirements for Physical Therapists, Occupational Therapists, Speech Language Pathologists and Audiologists During COVID-19 Emergency

To aid in the COVID-19 emergency response effort and augment the healthcare workforce, it has become necessary to [suspend certain rules and regulations regarding licensing, certification and credentialing of health care practitioners](#). This includes professionals in the fields of occupational therapy, physical therapy and speech therapy, often collectively referred to as “rehabilitation therapy.”

Occupational therapists and occupational therapy assistants licensed by the **State Board of Occupational Therapy**, physical therapists and physical therapy assistants licensed by the **State Board of Physical Therapy**, and speech-language pathologists, audiologists and assistants licensed by the **State Board of Examiners in Speech-Language Pathology and Audiology**, comprise a versatile group of practitioners. These professionals are well-trained and highly skilled in their respective fields. The U.S. Department of Homeland Security has identified physical and occupational therapists and assistants and speech pathologists as “Essential Critical Infrastructure Workers” in the coronavirus response effort.

It is crucial that these and other healthcare workers remain healthy during the pandemic. The regulations of these professions, however, call for certain tasks to be performed in-person or on-site, which in these unusual times may unnecessarily put them at risk of exposure to COVID-19. Similarly, there are other regulations that relate to supervision between, for example, a supervisor therapist and a supervisee assistant. In several instances, the regulations specifically call for face-to-face supervision, or require that both supervisor and supervisee be on the same premises. This too creates risks of transmission if, for example, one person has the virus but is asymptomatic.

To increase patient and practitioner safety and decrease exposure to the virus, the Department of State requested, and the Governor approved, temporary suspension of all statutory and regulatory requirements for licensees of the previously named Boards that call for direct supervision, or require contact/interaction that is “in-person,” “face-to-face,” “on-site,” “on the premises” or the like.

- Where direct supervision or in-person contact is called for, practitioners can utilize indirect supervision, including electronic means such as phone, video, text, email, etc. Further, for the Occupational Therapy Board, where “supervision” is called for, such supervision need not occur face-to-face or in-person (such interactions risk potential COVID-19 spread); instead, electronic means such as phone, video, text, email, etc. should be used.



- For the Physical Therapy Board, where a statute or regulation calls for indirect supervision, practitioners may act without supervision but are strongly encouraged to at least have access to a supervisor via electronic means in the event supervision is needed. For the Occupational Therapy and Speech Language Pathology and Audiology Boards (whose regulations do not use the term “indirect supervision”), if electronic supervision is unavailable, assistants are strongly encouraged to at least have access to a supervisor via electronic means in the event supervision is needed. If access to a supervisor via electronic means cannot be arranged, an assistant may act temporarily and sparingly without supervision, and should document the efforts that were made to arrange for access to a supervisor.
- These temporary suspensions shall last for the duration of the COVID-19 emergency unless rescinded sooner or extended by the Governor or the Department, and shall apply to:
 - licensed occupational therapists, occupational therapist assistants and holders of temporary licenses;
 - licensed physical therapists, physical therapist assistants and holders of temporary licenses; and
 - licensed speech-language pathologists, audiologists, assistants and holders of temporary licenses.
- None of the temporary suspensions or waivers granted herein relieve an assistant, temporary licensee or other supervised individual from a licensed practitioner supervisor.
- Furthermore, the temporary suspensions or waivers granted herein do not authorize, allow or otherwise permit, an assistant, temporary licensee or other supervised individual to engage in independent practice.

For all licensing-related inquiries, please use the email addresses found here: [Board Contact Info.](#)