

## Framework for Considering the non-CAPTE Graduate's Experiences in Licensing

### Background<sup>1</sup>

As a step toward licensure, physical therapists (PTs) that graduated from a non-CAPTE accredited educational program outside of the United States must have a review of educational credentials in order to determine substantial equivalency to a graduate of a CAPTE-accredited educational program.<sup>i</sup> The educational credentials review process is a comparison of the non-CAPTE curriculum to the United States standards as required by the individual jurisdiction. During a credentials review, the Federation of State Boards of Physical Therapy (FSBPT) Coursework Tool (CWT) may be used to record the post-secondary education, including clinical education, of a PT. Depending on the jurisdiction, the CWT may be used for initial and/or endorsement licensure decisions. Beginning no earlier than 2020, prior to being made eligible to take the National Physical Therapy Examination (NPTE), PT graduates from non-CAPTE accredited programs may need to demonstrate their education is equivalent to a CAPTE-accredited education by having an authorized credentialing agency complete an evaluation using the current version of FSBPT's CWT.

The Foreign Educated Standards committee (FESC) began exploring post-graduate professional experiences as a component of a licensure review process in early 2014. Graduates of non-CAPTE programs often present with educational deficiencies in areas where experience may be a viable alternative to demonstrating content in the area. Currently, when deficiencies are found in the education, an individual must satisfy those deficiencies by supplementing past education with additional college or university coursework. Although a jurisdiction may wish to take post-graduate experiences into consideration for licensure purposes, traditionally credentialing agencies only reviewed post-secondary education to determine equivalency and did not include an evaluation of work experience or a review of continuing education taught outside of the college or university system. The following motion from the 2014 FSBPT Delegate Assembly demonstrates the membership's interest in using professional experience as part of the licensure decision when educational deficiencies have been noted.

#### **Motion DEL-14-03**

To support the Board of Directors' exploration of tools to evaluate post-graduate/ professional experience of foreign educated physical therapists in order to assess their readiness to practice in the United States.

A report to the Delegate Assembly was included in the 2015 FSBPT Delegate Handbook which looked at the complexity of evaluating professional experience for licensing decisions. The report also provides background in the use of experience for credit in academic institutions and other professions.

### CWT Deficiencies

The deficiencies found by the credentialing agency may be in didactic or clinical education or both. The options for meeting deficiencies vary dependent on the type. This report and recommendation will focus on clinical education deficiencies only.

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<sup>1</sup> The reader may find the list of acronyms in Appendix B helpful in the reading of this resource

## Clinical Education Deficiencies

CWT 6 increases the number of clinical education hours required for a PT by an additional 250 for a total of 1050. A large number of PTs that did not graduate from a CAPTE-accredited educational program will not meet this criterion of 1050 hours. Currently, there are only two acceptable options for demonstrating those clinical experiences. The first is within the educational program; the school must verify the number of hours and or credits awarded as well as the location and type of experience with the supervisor or department listed. The second is completion of a US board-approved Supervised Clinical Practice (SCP). Using SCP to supplement a deficiency in clinical education hours was recommended by the FESC and adopted by the FSBPT Board of Directors several years ago.

Future FSBPT eligibility criteria potentially impacts the option to use SCP hours. When the NPTE eligibility requirements are implemented, prior to accessing the NPTE, all applicants will need to demonstrate substantial equivalence through an educational credentials evaluation using the most current CWT. The majority of state boards that require SCP, and the FESC model for SCP, require that the individual pass the NPTE *prior to* beginning the SCP. However, the applicant will need the credentials evaluation first, and if found to be deficient in clinical education hours, will not be eligible to take the NPTE. If the applicant cannot access and pass the NPTE, then an SCP will not be available to accumulate the necessary hours to be found equivalent on a credentials evaluation. Unless a third option is identified as an alternative to gain the required 1050 hours, applicants will have no way to supplement their deficient clinical education hours.

## Post-graduate Clinical Work Experience

A third option proposed by the FESC is to allow PT applicants that graduated from a non-CAPTE accredited educational program outside of the United States, to supplement clinical education hours with evidence of post-graduate clinical practice experience that meet certain criteria. The FESC recommends that a maximum of 300 of these post-graduate clinical work hours, performed inside or outside the USA, may be accepted to supplement any deficiency of the clinical hours from the curriculum.

The initial clinical education hours must still reflect the required diversity of clinical placements and patient/client populations required by the CWT. Applicants cannot solely use professional clinical work experiences unrelated to education to meet the entire 1050 hour requirement; this solution is intended to only be used in addition to clinical education as defined previously in the CWT and at a maximum of 300 supplemental hours. Clinical education requirements from the CWT6 include:

Clinical education must include physical therapist-supervised application of physical therapy theory, examination, evaluation, and intervention. The applicant must have a minimum of two full-time clinical internships of no less than 1050 hours total, which are supervised by a physical therapist. The required and maximum number of full-time clinical education credits is 22. The clinical internships must also show evidence of a variety of patient diagnoses or conditions.<sup>2</sup>

Additionally, to be eligible to use post-graduate clinical work experience to meet CWT deficiencies, the individual must have completed no fewer than 1,000 hours of clinical work experience as a PT. The

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<sup>2</sup> FSBPT Coursework Tool for Foreign Educated Physical Therapists CWT 6. Federation of State Boards of Physical Therapy. 2016, page 5.

1,000 hours must have been in direct patient care, completed in the most recent three years preceding the application, and must have been completed averaging no fewer than 20 hours/week.

In other words, the individual applicant cannot have only 300 hours of clinical experience in total and use those hours to meet a deficiency of CWT clinical education hours; he/she must have at minimum 1,000 hours to even be eligible for the option to use clinical experience. Additionally, employment at a facility as an administrator or in another non-patient care role is not an eligible work experience. An individual seeking credentials review as a PT must have direct patient care clinical practice experience hours as a PT.

These supplemental 300 hours are to meet the requirements of the CWT and do not count towards any required SCP hours the state mandates.

Below are examples of how post-graduate clinical experience hours may be applied:

Example 1: The applicant applies for initial licensure in a state that requires a passing score on the NPTE followed by 6 months of SCP. An applicant has 850 hours of traditional clinical education and supplements with 200 hours of clinical experience to meet the requirements of the CWT 6 in order to get access to the NPTE. The applicant is then required to complete the SCP per the requirements of that jurisdiction. If the individual then wants to become licensed by endorsement in another state and is found to be deficient in clinical education hours by the new state, the individual could apply either the SCP hours or the post-graduate clinical experience hours performed, inside or outside the USA, to the requirement.

Example 2: An individual wants to be licensed by endorsement in another state after working full time in the United States doing direct patient care. Based on date of graduation, the individual is evaluated on CWT4 and the only deficiency is 200 hours of clinical education. To supplement clinical education, 200 hours of the post-graduate work experience from the past five years in the United States is applied.

Example 3: The applicant applies for an initial state license in a state that requires an SCP without passing the NPTE first. The applicant has 750 hours of traditional clinical education and applies 300 hours of the SCP hours to meet the requirements of the CWT 6. The applicant then applies to take the NPTE and assuming no other deficiencies or issues, meets eligibility requirements.

Protection of the public must be maintained as the board's primary goal; however physical therapy boards should consider providing an avenue to be followed by qualified graduates from non-CAPTE accredited programs to become licensed. The 300 hours maximum equates to only a few months of post-graduate clinical experience. Additionally, it is only one of many requirements necessary to become licensed. Diversity of the physical therapy workforce is positively impacted by having well-qualified foreign educated providers licensed and working in this country. Not every post-graduate clinical experience can be counted towards the 300 hours. Boards must have reasonable restrictions and reassurance that the experiences meet a minimal level of quality. FESC recommends that the

credentialing agencies be responsible for the evaluation of the post-graduate work experience hours and documentation on the CWT. The assessment of the post-graduate, professional clinical hours should be straight forward and not overly onerous for the reviewer.

### Unacceptable Post-graduate Clinical Experience

- 1) Practicing as the only PT at the work setting (e.g., home health, telehealth, private practice)
  - a. An applicant may own a private practice; patient care hours worked there are eligible if the other requirements are met.
- 2) Practicing in a facility without at least one PT (other than the applicant) with at least two years experience as a PT
- 3) Volunteering or working as an aide

### Acceptable Post-graduate Clinical Experience

- 1) University Externship – conducted under the supervision of a university PT program
  - a. These are rarely available especially outside of the US, but are an acceptable option.
- 2) Residency/Fellowship Programs
  - a. These are rarely available especially outside of the US, but are an acceptable option.
  - b. Typically, within the US, a participant in a residency must be licensed. Due to the licensure requirement, a US residency would most likely be unavailable.
  - c. Criterion: Residency or fellowship accredited by the American Board of Physical Therapy Residency and Fellowship Education (ABPTRFE).<sup>3</sup>
    - i. For a list of current programs: <http://www.abptrfe.org/home.aspx>
- 3) Clinical Work Experience
  - a. Individual Eligibility
    - i. Minimum of 1,000 hours of PT clinical work experience with direct patient care
    - ii. Applicant eligible to practice as a PT in the country in which the experience was completed
    - iii. No disciplinary action on license for last 3 years
  - b. Maximum of 300 hours accepted toward the required 1050 clinical education hours
    - i. Regardless of how many clinical experience hours are submitted, the maximum 1050 hours (corresponding to 22 credits) will be assigned on the CWT
    - ii. Clinical hours over 1050 should be reported on an appendix of the CWT, but not be added to the total credits
  - c. Post-graduate clinical experience hours requirements
    - i. For physical therapists
      1. Completed an average of at least 20 hours per week for a minimum of 1,000 hours.
      2. Completed 1,000 hours in direct patient care internationally or in the USA.
      3. Completed the hours within the most recent three years preceding the application.

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<sup>3</sup> Residencies/fellowships almost always require an individual to be licensed. This option may be most applicable for a PT applying for licensure by endorsement.

4. Completed the hours within a hospital, rehabilitation center, or other facility that employed a minimum staff of at least three (including the applicant) practicing PTs during the applicant's clinical experience hours.
5. PTs employed at the facility with the applicant must have been available for consultation.
6. At least one of the PTs employed at the facility with the applicant must have at least two years experience practicing as a PT.
7. Verification that the applicant was eligible to practice in the country in which the experience was completed.
8. Verification that the applicant has had no disciplinary action against any professional license held for at least three years.
9. Notarized verification of the work experience provided by a supervisor such as the department head of the physical therapy practice or the director/head of the facility (Appendix A).

## **Conclusion**

Evaluating an applicant's post-graduate/professional experience would potentially supplement the current educational credentials review process. Both didactic and clinical deficiencies may be found and boards must provide a path towards licensure for these individuals. Scope of practice and education of PTs varies throughout the world; however, to meet licensure requirements, boards in the United States must have some assurance that an applicant's education is substantially equivalent to that of a graduate of a CAPTE-accredited educational program. Boards must use a trusted tool such as the CWT and the report from the credentialing agency to make this determination. The credential review is only one component used in the licensure decision; the determination for licensure is made after evaluation of the entire application and supporting documentation.

## Appendix A: Verification Form

This form is to be used to authenticate the clinical work experience for graduates of international Physical Therapy Programs which are not accredited by the Commission on Accreditation of Physical Therapy Education (CAPTE) and who did not have evidence of a minimum of 1050 Hours of full time clinical experience within the curriculum.

The form is to be completed by a representative of the facility where the hours were worked, preferably the supervisor, with direct knowledge, or the ability to confirm, the patient care hours for the Physical Therapist applying for credentialing for U.S. licensure. The signature of both the representative and applicant are to be notarized, attesting to the truthfulness of the statements in the form.

**The maximum number of hours that may be considered is 300 hours.**

1. Name of applicant \_\_\_\_\_
2. Applicant's date of birth \_\_\_\_\_
3. Name and position of direct supervisor:  
 \_\_\_\_\_ PT PTA Other \_\_\_\_\_
4. Name and title/position of the person filling out this form: *(if different from direct supervisor)*  
 \_\_\_\_\_ PT PTA Other \_\_\_\_\_
5. Name of the facility \_\_\_\_\_  
 Address of Facility \_\_\_\_\_
  - a. Type of facility: \_\_\_\_\_
  - b. Applicant's dates of employment in facility as a PT (from \_\_\_\_\_ to \_\_\_\_\_)
  - c. Average hours/week worked in direct patient care as a PT \_\_\_\_\_
  - d. Total Hours worked in direct patient care by applicant as a PT, in 3 years immediately prior to submission of form: \_\_\_\_\_

6. List of PTs that worked at the facility **with** the applicant (use additional pages if needed)

Name	Title/Position	Years of Experience as a PT

7. Based upon the performance of \_\_\_\_\_, the applicant **has/has not** (circle one) exhibited safe and effective care as a PT.  
 (Name of PT Applicant)
8. To my knowledge \_\_\_\_\_ **has/ has no** (circle one) disciplinary actions or complaints filed within the past three (3) years on any professional license.  
 (Name of PT Applicant)

**FSBPT Post-graduate Clinical Work Experience - Verification Form page 2**

**Attestation Statements**

**Attestation of Person Filling out Form** *(Requires Notary Seal and Signature)*

I, \_\_\_\_\_, hereby certify under oath that I am the person who completed this form;  
(Print Name)

all statements and documents enclosed herein are true.

\_\_\_\_\_  
Signature

**Attestation of Applicant** *(Requires Notary Seal and Signature)*

I, \_\_\_\_\_, hereby certify under oath that to the best of my knowledge all statements  
(Print Name)

and documents enclosed herein are true.

\_\_\_\_\_  
Signature

## Appendix B: Acronyms

The following acronyms are used throughout this resource paper:

ABPTS	American Board of Physical Therapy Specialties
ABPTRFE	American Board of Physical Therapy Residency and Fellowship Education
CAPTE	Commission on Accreditation in Physical Therapy Education
CWT	Coursework Tool
FESC	Foreign Educated Standards Committee
FSBPT	Federation of State Boards of Physical Therapy
NPTE	National Physical Therapy Examination
SCP	Supervised Clinical Practice

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