

Massachusetts Board of Allied Health Professionals

Frequency asked Questions for New Regulations

On November 18, 2016, new regulations went into effect which implemented major and minor changes to several portions of the Board's regulations, specifically in 259 CMR 3.00-5.00. The purpose of these frequently asked questions is to assist licensees and the public in understanding these changes. Many of the changes were simple substantive changes to the existing language.

1. One of the major impacts to the change was clarification by which professionals identify themselves in clinical records or other clinical documents they create or co-sign. This change impacted 3.04 (OT/OTAs), 5.04 (PT/PTAs).

- What is the correct way to identify oneself in documentation?

Answer:

Massachusetts law now requires that all Occupational and Physical Therapy professionals in documentation to sign their name, designation, and license number:

Examples would be:

Jane Doe, PT, XXXX

Mary Smith, OTA, XXXX

This change was made as part of implementation of Executive Order 562, which promotes elimination of confusion to the consumer.

2. What about all my other credentials or other professional documentation?

Answer:

For all other professional purposes, your professional designation must immediately follow your name.

3. What has changed regarding documentation for the Occupational Therapy professions?

Answer:

CMR 3.03 clarifies the responsibility for documenting patient encounters and identifies the specific types of documents that must be created. Timely and accurate documentation is necessary whenever occupational therapy services are provided regardless of the payer source. The client's records must be signed with the provider's name, professional designation, and license number.

The Occupational Therapists primary role is to document screenings, evaluations, initial goals and any modifications in goals, as needed, initial intervention plans, patient progress notes, formal review of the initial intervention plan (or reevaluations), discharge evaluations or summaries.

The Occupational Therapy Assistant's primary role is to document objective data from the assessments they perform with established service competency, and patient progress notes as directed by the occupational therapist.

The Occupational Therapy Aide's primary role is to document objective information, such as number of repetitions perform, etc. on documents such as logs and flow sheets.

Cosigning of documentation proceeds as follows:

- Occupational therapy assistants by no cosigning required.
- Occupational therapy students by supervising occupational therapist.
- Occupational therapy assistant students by supervising occupational therapist or occupational therapy assistant.
- Occupational therapy aides by supervising occupational therapist or occupational therapy assistant.

4. What has changed regarding the educational requirements for the initial application of an Athletic Trainer?

Answer:

A lot! You must have a graduate or undergraduate degree from an athletic training education program approved and accredited by the Commission on Accreditations of Athletic Training education (CAATE). This means the applicant no longer needs to submit specific courses to review. If your education is from a foreign (non US) program, it must be determined by BOC to have a CAATE equivalency. In extremely limited circumstances, the Board could approve another substantially equivalent program.

5. How do AT's supervise students?

Answer:

259 CMR 4.05 clarifies required supervision of an Athletic Training student which is:

- Supervision by a person who holds a current unrestricted license issued by the Board (example: licensee will not be in Stayed Suspension, Suspension, or Probation status).
- The supervising Athletic trainer must be physically present and have the ability to intervene to provide on-going and consistent education to the athletic training student at the site of the clinical experience.

“Site” means within the same facility or area and within close enough proximity to intervene on behalf of the student or respond to an emergency. Cosigning of documentation proceeds as follows:

- Athletic training students by supervising Athletic trainer.
- All documentation written by an athletic training student must be followed by the designation AT/s.

6. How have documentation requirements changed for the physical therapy professions?

Answer:

Physical therapists must document, date, and authenticate any and all: clinical examinations, evaluations, diagnoses, prognoses, progress, and any assessment of the patient's condition resulting in a change in the plan of care.

Physical Therapists, Physical Therapist Assistants, Physical Therapist Students, and Physical Therapist Assistant students rendering care or providing interventions must document each patient visit or encounter, typically in an ongoing treatment note, which at a minimum must contain: patient's current status and self-report; identification of specific interventions provided (by type, amount, frequency, intensity, duration); and factors modifying the intensity or frequency of interventions. Such

documentation must also contain, as applicable: change in status related to the plan of care; communications/consultations regarding the plan of care; any adverse reactions to interventions; progress on goals; equipment provided; and other pertinent information.

Cosigning of documentation proceeds as follows:

- Physical therapist assistants – no cosigning required.
- Physical therapist students by supervising physical therapist or clinical instructor.
- Physical therapist assistant students by supervising physical therapist, physical therapist assistant, or clinical instructor.
- Applicants practicing pending examination results by directing licensee.

7. What has not changed in the regulations?

Answer:

Licenses are still required for all Allied Health Professionals (PT, PTA, OT, OTA, and AT's, and Physical Therapy Facilities).

8. Are there other changes made to the regulations?

Answer:

Yes. The following minor changes have been made in the following sections of the regulations:

- 3.01 updates the name of the national credentialing organization for occupational therapy professionals
- 3.02 identifies the person receiving occupational therapy services in the broadest possible terms
- 3.05 changes the references to the national credentialing organization
- 4.01 updates and clarifies the definitions used in the following chapters
- 4.02 updates the ethical standards which the Board will apply to athletic training licensees
- 4.04 clarifies the prohibition on holding oneself out as an athletic trainer without licensure