



## Common Sense Initiative

**Mike DeWine**, Governor  
**Jon Husted**, Lt. Governor

**Joseph Baker**, Director

### MEMORANDUM

**TO:** Missy Anthony, Ohio Occupational Therapy, Physical Therapy, and Athletic Trainers Board

**FROM:** Joseph Baker, CSI Director

**DATE:** October 31, 2022

**RE:** **CSI Review – Physical Therapy – Requirements for foreign educated applicants (OAC 4755-23-12)**

---

On behalf of Lt. Governor Jon Husted, and pursuant to the authority granted to the Common Sense Initiative (CSI) Office under Ohio Revised Code (ORC) section 107.54, the CSI Office has reviewed the abovementioned administrative rule package and associated Business Impact Analysis (BIA). This memo represents the CSI Office's comments to the Board as provided for in ORC 107.54.

#### Analysis

This rule package consists of one amended rule proposed by the Ohio Occupational Therapy, Physical Therapy, and Athletic Trainers Board (Board). This rule package was submitted to the CSI Office on September 27, 2022, and the public comment period was held open through October 14, 2022. Unless otherwise noted below, this recommendation reflects the version of the proposed rule filed with the CSI Office on September 27, 2022.

Ohio Administrative Code (OAC) 4755-23-12 sets forth licensure requirements for physical therapist or physical therapist assistants seeking licensure in Ohio after completing a non-accredited physical therapy education program in another country. Under the rule, applicants must demonstrate that their educational background is reasonably equivalent to the requirements for Ohio licensees, among others. The rule is amended to specify that the Board may accept an evaluation of an applicant's international coursework completed by another state in certain cases, and to establish a waiver process for Test of English as a Foreign Language (TOEFL) requirements for individuals who have completed at least 1,000 hours of clinical practice in a state or territory of the United States or certain English-speaking nations.

77 SOUTH HIGH STREET | 30TH FLOOR | COLUMBUS, OHIO 43215-6117

[CSIPublicComments@governor.ohio.gov](mailto:CSIPublicComments@governor.ohio.gov)

During early stakeholder outreach, the Board shared the proposed rules with all licensees, and adopted a term change at the request of one commenter. No comments were received during the CSI public comment period.

The business community impacted by the rule includes individuals who are seeking licensure in Ohio after completing a physical therapy educational program in another country, as well as their potential Ohio employers. The adverse impact to business consists of the cost of completing the TOEFL requirements (estimated at \$195), the costs of completing an education evaluation (one example provided by the Board costs approximately \$1,200), and related expenses. The Board states that the adverse impact to business is necessary to verify that a practicing physical therapist or assistant has been adequately educated to practice in Ohio, and to protect the public against unqualified practice of the profession.

### **Recommendations**

Based on the information above, the CSI Office has no recommendations on this rule package.

### **Conclusion**

The CSI Office concludes that the Board should proceed in filing the proposed rule with the Joint Committee on Agency Rule Review.