
Kentucky State Board of Physical Therapy

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August 19, 1999

Re: The Kentucky State Board of Physical Therapy Opinion and Declaratory Ruling regarding state law governing the use of the clinical pathways form at the University of Kentucky

Dear Mr. Elkin:

This correspondence is in response to your letter dated February 22, 1999, asking for an opinion from the Kentucky State Board of Physical Therapy on whether the use of the "clinical pathways" by the University of Kentucky for "total knee and hip replacements and for closed fracture of single lower extremity" meets the regulations governing documentation required of the physical therapist. With your written inquiry, you enclosed a copy of such a clinical pathways form, which notes that "clinical pathways are guidelines for consideration which may be modified according to the individual patient's needs."

Please keep in mind that this correspondence is an opinion of the Board based solely on the facts you have presented. The Board has authorized this opinion to you as an Opinion and Declaratory Ruling pursuant to KRS 13A.130(3) and KRS 13A.010(2)(b) as the agency with jurisdiction to interpret the statutes and regulations governing the practice of physical therapy in the Commonwealth of Kentucky.

I. Whether the clinical pathways form meets the requirements of KRS Chapter 327.

The Board is presented with the question whether the clinical pathways form meets the requirements of KRS Chapter 327. The Board first directs you to its regulation on documentation found at 201 KAR 22:053 § 6, which will be set forth in full below.

Based on a review of the clinical pathways form in regard to its use and substitution for the traditional, narrative progress note, the Board is of the opinion that

the use of this form as the sole progress note does not meet the mandates of 201 KAR 22:053 § 6. As you can see from a full reading of the entire regulation section below, the regulation requires detailed information not in the clinical pathways form. While such a form may be referenced in the physical therapy record, the physical therapist is responsible for a written record that meets the following: The physical therapist is responsible for the physical therapy record of a patient. The physical therapy record shall consist of:

(1) The initial evaluation, a written report signed and dated by the physical therapist performing the evaluation which shall include:

- (a) The patient's name, age and sex;
- (b) Referral source, if appropriate;
- (c) Pertinent medical and social history;
- (d) Symptoms and date of onset;
- (e) Medical diagnosis, if available;
- (f) Subjective information;
- (g) Appropriate objective testing;
- (h) Precautions and contraindications;
- (i) Problems, interpretation, assessment;
- (j) Plan of care, including:
 - 1. Treatment to be rendered;
 - 2. Frequency and duration of treatment;
 - 3. Referral to other professionals, if indicated;
 - 4. Patient education and instruction; and
 - 5. Measurable goals.

(2) Progress notes, which are written, signed and dated by the person rendering treatment, and countersigned and dated by the physical therapist when written by supportive personnel, physical therapist students, physical therapist's assistant students, or examination candidates. The progress notes shall include:

- (a) A current record of treatment;
- (b) Patient's response to treatment;
- (c) Any factors affecting treatment; and
- (d) Data obtained by all objective tests performed.

(3) Reassessment, which is written, signed and dated by a physical therapist. If the physical therapist is treating the patient, these reports may be incorporated into the progress notes. If a physical therapist's assistant or supportive personnel are treating the patient, the report shall be a separate entry into the record. A reassessment shall include directly observed objective, subjective, and medical data necessary for the revision or reaffirmation of the plan of care and measurable goals.

(4) Discharge summary, which is the written, signed, and dated statement of the patient's physical therapy status upon discharge, including reference to previously established goals and program plan. A physical

therapist's assistant may write the discharge summary which shall be countersigned by the responsible physical therapist. The discharge summary shall include:

- (a) Data and reason for discharge;
- (b) Objective data related to the initial evaluation and subsequent review;
- (c) A complete and accurate summary of the patient's status at the time of discharge. Status includes functional ability, increase or limitation of range of motion, decrease or increase of pain, muscle power, general physical and mental condition including tolerance; and
- (d) Discharge plan, which means any recommendations the physical therapist has regarding the need for continuing physical therapy.

(5) The correct designation following the signature of the person who has entered a statement(s) into the patient record shall be as follows:

- (a) If written by a physical therapist or a physical therapist candidate granted a temporary permit by the board: "PT";
- (b) If written by a physical therapist's assistant or a physical therapist's assistant examination candidate granted a temporary permit by the board: "PTA";
- (c) If written by supportive personnel: "PT Aide", or "Physical Therapy Aide"; and
- (d) If written by students: "Physical Therapist Student" or "PT Student"; "Physical Therapist's Assistant Student" or "PTA Student".

201 KAR 22:053 § 6. Standards for Documentation.

II. Conclusion.

As the agency authorized by the Kentucky General Assembly to regulate the practice of physical therapy in this state, the Board is empowered to interpret its statutes and regulations. In summary, 201 KAR 22:053 § 6, Standard for Documentation, must be followed. It is the opinion of the Board that the use of the clinical pathways form does not meet the regulation.

A physical therapist who does not follow the mandates of 201 KAR 22:053 § 6 risks disciplinary action under KRS 327.070(9) for failure or refusal to obey an administrative regulation of the Board.

Sincerely yours,

Kentucky State Board of Physical Therapy
Tom Pennington, P.T., Chair

By:
Nancy Brinly, P.T., Executive Secretary

cc: Board members