



July 13, 2020

Michael J. Rigas
Acting Director
U.S. Office of Personnel Management
1900 E Street N.W.
Washington, D.C. 20415

Dear Acting Director Rigas:

On June 26, 2020, President Trump issued the Executive Order “Modernizing and Reforming the Assessment and Hiring of Federal Job Candidates,” in which he directed the Director of the U.S. Office of Personnel Management, in consultation with the Director of the Office of Management and Budget, the Assistant to the President for Domestic Policy, and the heads of agencies, to review and revise all job classification and qualification standards for positions within the competitive service.

The American Physical Therapy Association welcomes the opportunity to support OPM’s efforts to revise the job and classification standards for physical therapists (GS-633) and physical therapist assistants (classified as rehabilitation therapy assistants), GS-636.

APTA represents more than 100,000 member physical therapists, physical therapist assistants, and student of physical therapy. APTA is dedicated to building a community that advances the physical therapy profession to improve the health of society. As experts in rehabilitation, prehabilitation, and habilitation, physical therapists play a unique role in society in prevention, wellness, fitness, health promotion, and management of disease and disability for individuals across the age span, helping individuals improve overall health and prevent the need for avoidable health care services. Physical therapists’ roles include education, direct intervention, research, advocacy, and collaborative consultation. These roles are essential to the profession’s vision of transforming society by optimizing movement to improve the human experience.

Position Classification Standards

We strongly recommend that OPM review and update the position classification standard for [rehabilitation therapy assistants](#), GS-636, who are now referred to as **physical therapist assistants** [emphasis added]. The classification standard, initially established in 1969, has not been updated since that time. This is the same year that 15 students graduated from the first physical therapist assistant programs. Today, approximately [97,000](#) physical therapist assistants are licensed or certified and working in the United States. As discussed on [APTA’s website](#), physical therapist assistants provide physical therapist services under the direction and supervision of a physical therapist. Physical therapist assistants implement components of patient care, obtain data related to the treatments provided, and collaborate with the physical therapist to modify care as necessary.

In addition, although the [job family standard for physical therapists](#), GS-633, was last revised in September 2017, updates are necessary. Physical therapists are movement experts who improve quality of life through prescribed exercise, hands-on care, and patient education. Physical therapists diagnose and treat individuals of all ages, from newborns to people at the end of life. Many patients have injuries, disabilities, or other health conditions that need treatment. But physical therapists also care for individuals who simply want to become healthier and to prevent future problems. Physical therapists examine each person and then develop a treatment plan to improve their ability to move, reduce or manage pain, restore function, and prevent disability. Today, approximately [233,000](#) licensed physical therapists are



working in the United States. We welcome the opportunity to offer feedback on how the standard can be enhanced.

General Schedule Qualification Standards

Similar to our recommendation for updating the position classification standard, we strongly encourage OPM to review and update the [qualification standard](#) for rehabilitation therapy assistants, GS-636, who are now referred to as physical therapist assistants. The education requirement should be updated to reflect that to work as a physical therapist assistant in the United States, individuals must graduate from a [Commission on Accreditation in Physical Therapy Education](#)-accredited physical therapist assistant education program and pass a state-administered national examination to obtain licensure or certification, a requirement in all states. Further, the performance levels should reflect entry at GS-7 and full performance at GS-10.

In addition, due to inaccuracies associated with references to the accrediting body, we strongly encourage OPM to review and update the [qualification standard](#) for physical therapists, GS-633. Physical therapists must earn a doctor of physical therapy degree from a [Commission on Accreditation in Physical Therapy Education](#)-accredited physical therapist education program and pass a state-administered national examination to obtain licensure, a requirement in all states. Further, the performance levels should reflect entry at GS-12 and full performance at GS-14.

APTA looks forward to being a vested partner with OPM as it reviews and revises job classification and qualification standards for positions within the competitive service. Should you have any questions, please do not hesitate to contact Kara Gainer, APTA's director of regulatory affairs, at karagainer@apta.org. Thank you for your consideration.

Sincerely,

A handwritten signature in black ink that reads "Sharon L. Dunn". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Sharon L. Dunn, PT, PhD
Board-Certified Orthopaedic Clinical Specialist
President

cc:

Mark Esper, Secretary, U.S. Department of Defense
Robert Wilkie, Secretary, U.S. Department of Veterans Affairs
Richard Stone, Executive in Charge, U.S. Department of Veterans Affairs
Brett P. Giroir, Assistant Secretary for Health, U.S. Department of Health and Human Services
Michael D. Weahkee, Director, Indian Health Service