

August 20, 2026

The Virginia Board of Physical Therapy convened for a full Board meeting on Thursday, August 20, 2026, at the Department of Health Professions, Perimeter Center, 9960 Mayland Drive, 2nd Floor, Board Room #2, Henrico, Virginia.

BOARD MEMBERS PRESENT

Megan Bureau, PT, DPT, EdD, President
Srilekha Palle, PT, DPT, Vice-President
Melissa Fox, PT, DPT
Margaret Guarino, PT, DPT
Michele Wiley, PT, DPT, DHSc

BOARD MEMBERS NOT PRESENT:

None

DHP STAFF PRESENT FOR ALL OR PART OF THE MEETING

Sarah Georgen, Board Administrator
Annette Kelley, MS, CSAC, Deputy Executive Director
Laura Mueller, Senior Licensing Specialist
Matt Novak, Agency Regulatory Coordinator
Emma Sachs, Administrative Support Specialist
Corie E. Tillman Wolf, JD, Executive Director

BOARD COUNSEL:

Sara Blose, Senior Assistant Attorney General

OTHER GUESTS PRESENT:

Ken Hucheson, Old Dominion Public Affairs
Becca L.
Paige Roberts
Heidi Schlicher Cook, Old Dominion Public Affairs

**Participant indicates attendance to count toward continuing education requirements*

CALL TO ORDER

Dr. Bureau called the meeting to order at 10:02 a.m. and asked the Board members and staff to introduce themselves.

With five Board members present at the meeting, a quorum was established.

Dr. Bureau read the mission of the Board, which is also the mission of the Department of Health Professions.

Dr. Bureau reminded the Board members and audience about microphones, computer agenda materials, breaks, sign-in sheets, and attendance for continuing education requirements.

Ms. Tillman Wolf then read the emergency egress instructions.

APPROVAL OF MINUTES

Dr. Bureau opened the floor to edits or corrections to the draft minutes for the Board meeting held on May 12, 2026. Hearing none, the minutes were approved as presented.

ORDERING OF THE AGENDA

Dr. Bureau opened the floor to any additional items to add to the agenda. Ms. Tillman Wolf stated that Dr. Brown was unable to attend the meeting and there would be no Agency Report.

Upon a **MOTION** by Dr. Fox, and properly seconded by Dr. Wiley, the Board voted to approve the agenda as presented. The motion carried unanimously (5-0).

PUBLIC COMMENT

There was no public comment.

STAFF REPORTS

Executive Director's Report and Physical Therapy Compact Update – Corie E. Tillman Wolf, JD, Executive Director

Welcome

Ms. Tillman Wolf welcomed Emma Sachs, Administrative Office Specialist, to the Board's administrative team.

Board Updates

Ms. Tillman Wolf provided a comprehensive update on Board member appointments, noting that citizen member Pamela Pryor resigned on June 17th, which created two vacancies (one citizen seat and one PTA seat) while another seat is approaching reappointment. She informed the Board that a News Brief will be sent soon to licensees and noted the topics to be included.

Additionally, Ms. Tillman Wolf reported that an agency policy is currently in development concerning the calculation of administrative costs for disciplinary cases, emphasizing ongoing efforts to standardize and clarify administrative procedures.

FSBPT Updates

Ms. Tillman Wolf provided updates on recent activities of the Federation of State Boards of Physical Therapy (FSBPT). She reported on the Leadership Issues Forum held July 18–19, 2026 in Alexandria, which she attended alongside Dr. Bureau. Ms. Tillman Wolf noted topic areas of discussion, but deferred to the report to be provided by Dr. Bureau.

She further noted that the FSBPT Annual Meeting is scheduled for October 22–24, 2026 in Greenville, South Carolina, which will be attended by Dr. Bureau, Dr. Palle, and herself.

Ms. Tillman Wolf provided additional updates including the following:

- FSBPT announced that NPTE fees will not increase before 2028.
- FSBPT continues to collaborate with stakeholders on standard setting for the Test on English as a Foreign Language (TOEFL), as well as other commonly used English proficiency examinations, and expects to conclude the process by the end of 2026. She noted that the Board currently follows FSBPT's recommendations related to English proficiency standards.
- The Commission on Accreditation in Physical Therapy Education (CAPTE) recently updated its guidance on faculty licensure - that faculty licensure requirements depend on state laws where programs are located. Ms. Tillman Wolf noted that this guidance does not impact the Board's Guidance Document 112-4, which provides that unlicensed instructors may teach academic content at Virginia programs as long as the instruction does not constitute the practice of physical therapy under Virginia Code § 54.1-3473.
- For information purposes, a recently released article from FSBPT that discusses AI considerations for practitioners has been included in the agenda packet.

FSBPT Upcoming Webinars

Ms. Tillman Wolf highlighted upcoming Regulatory Hour webinars for September through December 2026.

PT Compact Updates

Ms. Tillman Wolf reported that the PT Compact now includes 41 member states, with Michigan recently joining. She noted that 38 states currently issue compact privileges. As of June 30th, a total of 916 PTs and 223 PTAs hold compact privileges for Virginia, while 1,017 Virginia-licensed PTs and 199 PTAs hold compact privileges allowing practice in other states. She also noted anticipated implementation timelines for Maine (early 2027) and Michigan (January 2028).

2026 Board Meetings

Ms. Tillman Wolf provided the 2026 Board meeting schedule:

- November 20, 2026

Ms. Tillman Wolf announced the 2027 Board meeting schedule:

- February 2, 2027
- May 11, 2027
- August 17, 2027
- November 16, 2027

Notes and Reminders

Ms. Tillman Wolf provided general reminders and expressed appreciation for the Board members' continued service.

Ms. Tillman Wolf answered questions from the Board.

With no further questions, Ms. Tillman Wolf concluded her report.

Discipline Report – Annette Kelley, MS, CSAC, Deputy Executive Director

As of June 30, 2026, Ms. Kelley reported the following disciplinary statistics:

- 41 Patient Care Cases:
 - 0 at Informal Conferences
 - 1 at Formal Hearings
 - 14 at Enforcement
 - 26 at Probable Cause
 - 0 at Administrative Proceedings Division
- 21 Non-Patient Care Cases:
 - 0 at Informal Conferences
 - 0 at Formal Hearings
 - 3 at Enforcement
 - 16 at Probable Cause
 - 2 at Administrative Proceedings Division
- 5 cases were listed in Compliance

Ms. Kelley reported the following Total Cases Received and Closed:

- | | |
|-------------------|---------------------|
| • Q3 2023 – 10/8 | • Q2 2025 – 15/9 |
| • Q4 2023 – 4/5 | • Q3 2025 – 16/15 |
| • Q1 2024 – 10/14 | • Q4 2025 – 15/8 |
| • Q2 2024 – 27/4 | • Q1 2026 – 28/14 |
| • Q3 2024 – 10/15 | • Q2 2026 – 16/10 |
| • Q4 2024 – 9/29 | • Q3 2026 – 19/24 |
| • Q1 2025 – 18/12 | • Q4 – 2026 – 26/31 |

Ms. Kelley provided an overview of PTA disciplinary cases from Q1 2024 to Q4 2026.

With no further questions, Ms. Kelley concluded her report.

Licensing Report – Sarah Georgen, Board Administrator

Licensure Statistics – All Licenses

Ms. Georgen presented licensure statistics that included the following information and trends in license count:

License	Q3 2026	Q4 2026	Change +/-
Physical Therapist	9,932	10,151	+219
Physical Therapist Assistant	3,871	3,937	+63
Total PTs and PTAs	13,803	14,088	+285
Direct Access Certification	1,229	1,236	+7

Examination Statistics

Ms. Georgen presented statistics on the Physical Therapist and Physical Therapist examinations from the July 2026 administrations, including examination trends.

Licensure Renewal Notifications

Ms. Georgen announced that licensure renewal notifications will be issued in Fall 2026 in preparation for the upcoming renewal deadline of December 31, 2026.

With no questions, Ms. Georgen concluded her report.

BOARD COUNSEL REPORT – Sara Blose, Senior Assistant Attorney General

Ms. Blose reported on two cases involving the Board that are currently pending in the Henrico County Circuit Court and the Virginia Supreme Court.

BREAK

The Board took a break at 10:26 a.m. and reconvened at 10:30 a.m.

COMMITTEE REPORTS

Legislative/Regulatory Committee Report - Megan Bureau, Committee Chair

Dr. Bureau stated that the Legislative/Regulatory Committee met on August 19, 2026, and provided a brief summary of the items discussed. She noted that a draft Guidance Document for imaging referrals by Physical Therapists would be discussed later in the agenda.

She stated further that the Committee will provide recommendations regarding the periodic review and regulatory amendments to the full Board at either the November or February meeting.

FSBPT Ethics and Legislation Committee – Srilekha Palle, PT, DPT

Dr. Palle reported on the recent activity of the FSBPT Ethics & Legislation Committee, noting that the committee held two meetings focused on developing a drafting strategy for communications to key stakeholders. This initiative is part of the committee's ongoing efforts, aligned with its mission to improve consumer protection and review the Model Practice Act, to engage external parties in forthcoming policy discussions. Dr. Palle emphasized that outreach would include direct contact with FSBPT staff to ensure alignment with broader regulatory and legislative objectives. She advised that additional updates will be provided following the October Annual FSBPT Meeting.

Report from FSBPT Leadership Issues Forum – Megan Bureau and Corie E. Tillman Wolf

Dr. Bureau summarized key discussions from the FSBPT Leadership Issues Forum, including committee and task force updates, strategies to improve board engagement and accessibility for licensees, and the importance of informed consent and reviewing available FSBPT resources. She highlighted Virginia's strong workforce data collection system and encouraged review of the DHP workforce report. Additional updates included the Commission on Accreditation in Physical Therapy Education's (CAPTE) work on accreditation alignment, considerations regarding engaging public members, planned improvements to the FSBPT practice exam to address test-integrity issues, and recent updates on APTA initiatives. Dr. Bureau encouraged board members to remain actively involved in national regulatory activities.

Ms. Tillman Wolf echoed the importance of workforce data, expressing pride in the work of the Healthcare Workforce Data Center (HWDC) and its role in compiling meaningful information for regulatory review. She also noted discussions related to public outreach and communications with the public and licensees, reporting that the DHP Communications Director, Kelly Smith, would attend the November meeting to share information on DHP and Board communications initiatives.

Dr. Fox and Dr. Palle raised questions regarding electronic participation, live-streaming capabilities, and foreign-graduate traineeships. Dr. Fox inquired about how the Board's communication practices compare with those of other Virginia regulatory boards. Dr. Bureau and Ms. Tillman Wolf addressed and provided clarifications. Ms. Tillman Wolf recommended that discussions related to foreign-graduate traineeships be referred to the Legislative/Regulatory Committee for further review, and Dr. Bureau agreed to advance the topic to the Committee.

With no further questions, Dr. Bureau and Ms. Tillman Wolf concluded their reports.

LEGISLATIVE AND REGULATORY REPORT

Legislative Report and Report on Status of Regulatory Actions – Matt Novak, Agency Regulatory Coordinator

Mr. Novak provided an update on the status of pending regulatory actions and answered questions from the Board related to the regulatory process.

With no further questions, Mr. Novak concluded this report.

BOARD ACTIONS

Adoption of Proposed Guidance Document Regarding Imaging Referrals by Physical Therapists

Ms. Tillman Wolf provided an overview of the draft Guidance Document that has been recommended by the Legislative/Regulatory Committee for consideration by the full Board (attachment A).

Upon a **MOTION** by Dr. Fox, and properly seconded by Dr. Palle, the Board voted to adopt the proposed Guidance Document regarding imaging referrals by Physical Therapists as presented. The motion carried unanimously (5-0).

NEW BUSINESS

Review and Feedback - Continuing Education Information Page

The Board reviewed the draft Continuing Education Requirements one-page document to ensure it serves as a clear, single resource outlining Type 1 and Type 2 CE requirements, noting that the Legislative/Regulatory Committee had recently reviewed total hour specifications.

Recent Concerns Regarding Traineeships for Graduates Awaiting Examination Results and Proposed Communications to Supervising Licensees – Corie Tillman Wolf

Ms. Tillman Wolf outlined recent concerns regarding traineeships for graduates awaiting examination results, focusing particularly on how trainees and students are identified to the public in clinical settings and on practice websites. Ms. Tillman Wolf noted that some trainees are not being clearly identified and stated that clarifying guidance will be included in the Board's upcoming newsletter. Ms. Tillman Wolf noted that the Board had received a surprising number of complaints in this area.

Dr. Palle raised questions about inconsistencies between insurance requirements and Board identification guidance, while Dr. Guarino asked whether the issue was related to competency or identification. Dr. Palle emphasized the distinction between documentation obligations and identification expectations. In response to questions regarding how such complaints are handled, Ms. Tillman Wolf explained that advisory letters are routinely issued to supervising Physical Therapists to address these concerns.

BOARD MEMBER DEVELOPMENT

Best Practices for Board Members – Conflicts of Interest – Sara Blose, Board Counsel

Ms. Blose provided a brief overview of best practices for board members for conflicts of interest.

NEXT MEETING

The next meeting date is scheduled for November 20, 2026.

ADJOURNMENT

Dr. Bureau called for any objections to adjourn the meeting. Hearing no objections and with all business concluded, the meeting adjourned at 11:21 p.m.

Corie E. Tillman Wolf, JD, Executive Director

Date

Adopted: _____

Effective: _____

Virginia Board of Physical Therapy

Guidance on Diagnostic Imaging Referrals by Physical Therapists

The Virginia Board of Physical Therapy (Board) recently received a request for further guidance regarding the ability of a Virginia licensed physical therapist to refer patients for diagnostic imaging studies.

Based upon a review of the relevant provisions of the *Virginia Code* and the Board's Regulations Governing the Practice of Physical Therapy, the Board opines that there are no provisions that would prohibit a Virginia licensed physical therapist from referring a patient to an appropriate practitioner for diagnostic imaging studies. The Board's analysis of the relevant provisions related to scope of practice and referrals is set forth below.

Scope of Practice

The current scope of practice for physical therapy appears in Virginia Code [§ 54.1-3473](#):

"Practice of physical therapy" means that branch of the healing arts that is concerned with, upon medical referral and direction, the evaluation, testing, treatment, reeducation and rehabilitation by physical, mechanical or electronic measures and procedures of individuals who, because of trauma, disease or birth defect, present physical and emotional disorders. The practice of physical therapy also includes the administration, interpretation, documentation, and evaluation of tests and measurements of bodily functions and structures within the scope of practice of the physical therapist. However, the practice of physical therapy does not include the medical diagnosis of disease or injury, the use of Roentgen rays and radium for diagnostic or therapeutic purposes or the use of electricity for shock therapy and surgical purposes including cauterization.

A physical therapist's scope of practice explicitly excludes the *use* of "Roentgen rays" or x-rays for diagnostic or therapeutic purposes. Further excluded is the *use* of "radium" for diagnostic or therapeutic purposes, which can be interpreted to encompass CT and PET scans and nuclear medicine imaging. The Board notes that the reference to "use" contemplates the actual use of the equipment by a practitioner for diagnostic or therapeutic purposes, rather than referral of a patient for imaging studies based upon these specified modalities. Further, the scope definition is silent on the *use* of other imaging modalities that apply magnetic fields, radio waves, or sound waves instead of radiation such as MRI and ultrasound.

Regardless of modality, the scope of practice does not permit a physical therapist to medically diagnose disease or injury.

Duty to Refer

At the time of evaluation or treatment, where a patient's medical condition is determined to be beyond the physical therapist's scope of practice, the physical therapist is required to

Adopted: _____

Effective: _____

immediately refer such patient to an appropriate practitioner who is either a licensed doctor of medicine, osteopathy, chiropractic, podiatry, or dental surgery, or a licensed advanced practice registered nurse practicing in accordance with the provisions of [§ 54.1-2957](#). See Va. Code [§ 54.1-3482](#) (E). Where a physical therapist determines that further medical diagnosis of disease or injury through imaging studies is warranted, the physical therapist may refer a patient to a radiologist, as a licensed doctor of medicine or osteopathy, as an appropriate practitioner.

The Board notes that the above analysis relates to the Board's jurisdiction over the practice of physical therapy. The Board does not and cannot opine regarding the applicability of laws or regulations that relate to the practice of medicine or radiology or to the receipt of referrals for diagnostic imaging.

DRAFT