



Substantive Change Policy 13.5 – Change in Practice Sites Call for Comment

*ABPTRFE is seeking [public comment](#) on Policy 13.5. The comment period is open until **March 27**. All feedback is confidential, therefore, respondents are assured of anonymity and that comment sources are not shared with ABPTRFE.*

Background

In June 2018, the American Board of Physical Therapy Residency and Fellowship Education (ABPTRFE) adopted its [Processes and Procedures](#).

In response to concerns received in December 2018 regarding ABPTRFE policy 13.4.2 specific to a program increasing the number of participant practice sites and the onsite visit requirement, ABPTRFE held a [Stakeholder Forum](#) on April 29, 2019, to discuss the impact of this policy on the growth of residency and fellowship programs to gather productive feedback and suggestions for ABPTRFE consideration.

Following this forum, the ABPTRFE Standards Committee reviewed, discussed, and conducted a program impact analysis on alternatives identified from this stakeholder forum. Based on the results of this analysis, the Standards Committee evaluated 5 viable alternatives and provided its [recommendations](#) to ABPTRFE for consideration at its May 2019 meeting.

ABPTRFE discussed all recommendations submitted by the Standards Committee and determined that further review was needed. Following this decision, ABPTRFE convened a subgroup to further discuss, investigate, and analyze all recommendations proposed by the Standards Committee.

The subgroup presented its analysis to ABPTRFE during its September 2019 meeting. ABPTRFE determined that additional research was necessary prior to modifying Policy 13.4.2, as new questions emerged. ABPTRFE carefully vetted these alternative options to minimize unintended burdens and reconvened the subgroup to further review Policy 13.4.2. Additionally, further [recommendations](#) were presented to ABPTRFE for consideration at its January 2020 meeting.

During this meeting, ABPTRFE approved the following revised substantive change policy related to increase in practice sites. In this policy, ABPTRFE separated the addition of practice sites from the current Policy 13.4 and created a separate policy focused on the increase in practice sites (proposed Policy 13.5).

Introduction

Policy 13.5 (below) reflects input from the April 2019 Stakeholder Forum and ABPTRFE Standards Committee while providing the processes necessary for ABPTRFE to maintain program oversight and provide prospective and current participants with assurances that all accredited programs meet ABPTRFE quality standards.

Substantive Change Reporting

Policy 13.5 maintains the Part 1 reporting processes for substantive changes which require programs to obtain prior ABPTRFE approval of new practice sites by submitting substantive change documentation.

Onsite Visit

The current policy requires all new practice sites to undergo an onsite visit regardless of the type of education being provided at the practice site (e.g., patient-care practice hours, mentoring, supervision of a physical therapist assistant to student).

In discussing revisions to its policy related to an increase in practice sites, ABPTRFE unanimously agreed that focused and structured mentoring is the primary component that delineates accredited physical therapy residency and fellowship programs apart from other postprofessional educational experiences. When substantive changes are made to increase participant practice sites, ABPTRFE monitors implementation of the changes to ensure that mentoring and instructional activities continue to be conducted in compliance with the quality standards, following the program's mission, policies, and procedures. ABPTRFE accreditation communicates assurances to prospective and current participants that the accredited program meets all quality standards.

Policy 13.5 requires only additional practice sites that are used for mentoring, undergo an onsite visit. Once a program has successfully completed 5 consecutive onsite visits in the current accreditation cycle, demonstrating continued compliance with ABPTRFE Quality Standards, processes and procedures, the program will be placed on "notification status only".

Please note that within the policy, the option of a program undergoing a virtual onsite visit for these substantive changes was added. ABPTRFE is currently working with APTA to finalize the processes and procedures for a virtual onsite visit.

Notification Status

A program placed on "notification status only" continues to report all additional practice sites being added using the Substantive Change Part 1 application. However, after ABPTRFE approves Part 1, and the program has added these additional sites, no further documentation or onsite visits are required.

A program remains on "notification status only" throughout its accreditation period. Provided the program continues to demonstrate compliance with ABPTRFE Quality Standards, processes and

procedures during the renewal of accreditation onsite visit mentoring evaluation, the program remains on “notification status only”.

“Notification status only” is removed if the program 1) receives any “Needs Improvement” or “Inadequate” finding during its renewal of accreditation onsite visit mentoring evaluations as indicated within the Accreditation Report Rubric ([Clinical](#) or [Non-Clinical](#)), or 2) a program is determined to not be in compliance with ABPTRFE Quality Standards, processes and procedures upon investigation of a formal complaint filed against the program.

Example 1– Achieving and Maintain Notification Status Only

Program is accredited by ABPTRFE with 2 practice sites. Within its first accreditation year, the program plans to add 10 practice sites, 7 of which will be used for mentoring.

The program submits the Change in Practice Sites Application Part 1 informing ABPTRFE of their planned practice site additions. Upon review, ABPTRFE initially approves the addition of these 10 practice sites and the program begins utilizing them for training.

Following the addition of practice sites, the program submits the Change in Practice Sites Application Part 2 and undergoes an onsite visit for 5 of the 7 additional practice sites that are used for mentoring.

During the onsite visit, the program demonstrates continued compliance with ABPTRFE Quality Standards, processes and procedures. ABPTRFE approves the Change in Practice Sites Application Part 2 and places the program on “notification status only”.

Within the program’s second year of accreditation, it plans to add 15 practice sites, the program submits the Change in Practice Sites Application Part 1 informing ABPTRFE of their planned practice site additions.

Upon review, ABPTRFE approves the addition of these 15 practice sites and the program begins utilizing them for training. No additional documentation or onsite visit is required by the program.

The program continues to add additional practice sites over the course of its accreditation term by submitting the Change in Practice Sites Application Part 1 informing ABPTRFE of their planned practice site additions and receiving prior approval for these sites.

At the program’s renewal of accreditation onsite visit, the program demonstrates it continues to meet ABPTRFE Quality Standards, processes and procedures. The program remains on “notification status only”.

Following renewal of accreditation, the program continues to add additional practice sites and submits Change in Practice Sites Application Part 1 informing ABPTRFE of their planned practice site additions and receiving prior approval for these additional sites.

Example 2– Achieving Notification Status After Initial Unsuccessful Onsite Visits

Program is accredited by ABPTRFE with 1 practice site. Within its first accreditation year, the program plans to add 10 practice sites, 7 of which will be used for mentoring.

The program submits the Change in Practice Sites Application Part 1 informing ABPTRFE of the planned practice site additions. Upon review, ABPTRFE initially approves the addition of these 10 practice sites and the program begins utilizing them for training.

Following the addition of practice sites, the program submits the Change in Practice Sites Application Part 2 and undergoes an onsite visit for 5 of the 7 added practice sites that are used for mentoring.

During the onsite visit, the program receives “Needs Improvement” and/or “Inadequate” findings for 2 of the 5 practice sites during the mentoring evaluation.

The program addresses the Required Actions from the onsite visit and demonstrates its compliance with ABPTRFE Quality Standards, processes, and procedures. ABPTRFE approves the Change in Practice Sites Application Part 2 but does not place the program on “notification status only”.

Within the program’s second year of accreditation, the program plans to add 5 practice sites, all of which will be used for mentoring.

The program submits the Change in Practice Sites Application Part 1 informing ABPTRFE of their planned practice site additions. Upon review, ABPTRFE initially approves the addition of these 5 practice sites and the program begins utilizing them for training.

Following the addition of practice sites, the program submits the Change in Practice Sites Application Part 2 and undergoes an onsite visit for these 5 additional practice sites that are used for mentoring.

During the onsite visit, the program demonstrates continued compliance with ABPTRFE Quality Standards, processes and procedures. ABPTRFE approves the Change in Practice Sites Application Part 2 and places the program on “notification status only”.

Example 3– Program Removed from Notification Status Only During Renewal of Accreditation

The program follows the same process as Example 1 and is placed on “notification status only” during its accreditation period.

However, during the renewal of accreditation onsite visit, the program receives “Needs Improvement” and/or “Inadequate” findings during its onsite visit mentoring evaluations as noted within the Accreditation Report Rubric.

The program addresses the Required Actions from the renewal of accreditation onsite visit and demonstrates its compliance with ABPTRFE Quality Standards, processes, and procedures. ABPTRFE grants the program renewal of accreditation.

Following renewal of accreditation, the program plans to add 5 additional practice sites, which will all be used for mentoring. The program submits Change in Practice Sites Application Part 1 informing ABPTRFE of their planned practice site additions.

Upon review, ABPTRFE initially approves the addition of these 5 practice sites and the program begins utilizing these new sites for training. The program submits the Change in Practice Sites Application Part 2 and undergoes an onsite visit for these 5 mentoring practice sites.

During the onsite visit, the program demonstrates continued compliance with ABPTRFE Quality Standards, processes and procedures. ABPTRFE approves the Change in Practice Sites Application Part 2 and returns the program to “notification status only”.

13.0 Substantive Changes

- 13.5 **Change in Practice Sites:** a program seeking to increase the number of participant practice sites requires prior approval to verify all additional practice sites continue to meet ABPTRFE Quality Standards (e.g., patient population, mentoring, support services). These are the steps programs complete in obtaining Board approval for this substantive change:
- 13.5.1 **Change in Practice Sites Application Part 1:** A program submits a Change in Practice Sites Application Part 1, 30 days prior to the next ABPTRFE meeting. The completed application and documentation are reviewed and presented to the Board for initial approval.
 - 13.5.2 **Substantive Change Implementation:** Following the addition of practice sites, the program submits a Change in Practice Sites Application Part 2. The first 5 consecutive mentoring practice sites added within an accreditation cycle undergo an onsite visit (e.g., in-person or virtual).
 - 13.5.3 **Change in Practice Sites Substantive Change Decision:** The Board reviews all documentation submitted to date and approves or denies the substantive change, in compliance with the ABPTRFE Quality Standards. ABPTRFE notifies the program in writing within 30 days of the Board’s action and notifies other relevant constituencies in accordance with policy 8.0 Program Notifications
 - 13.5.4 **Notification Status:** If the program demonstrates continued compliance with ABPTRFE Quality Standards, processes, and procedures during 5 consecutive onsite visits within the current accreditation cycle, the program is placed on a “notification status only” and submits a Change in

Curriculum Application Part 1 30 days prior to the proposed change, but is not required to undergo an onsite visit (e.g., in-person or virtual).

Upon renewal of accreditation, if the program receives any “Needs Improvement” or “Inadequate” finding during onsite visit mentoring evaluations, the program’s “notification status only” is removed. The program would be required to undergo onsite visits for 5 consecutive mentoring sites added through the Substantive Change process during the next accreditation cycle.

*Please provide your comments for policy 13.5 by **March 27** at:*
<https://www.surveymonkey.com/r/XT83983>