



February 18, 2022

Chair Tina Liebling  
477 State Office Building  
St. Paul, MN 55155

Re: Physical Therapist Scope of Practice Legislation and Questionnaire – HF3240/SF3083

Dear Chair Liebling:

I am writing on behalf of the Minnesota Chiropractic Association (“MCA”) to express our concerns with the proposed changes to the physical therapist’s scope of practice outlined in HF3240 and in the Questionnaire for Expanded Scope of Practice for Health Occupations submitted by the Minnesota Chapter of the American Physical Therapist Association (“APTA-MN”).

The MCA is concerned with the addition of the term “diagnosis” as well as the removal of the 90-day limit for treatment without a referral. Physical therapists are limited by their education and training to provide a diagnosis. Furthermore, physical therapists are not trained to interpret, nor can they order the imaging necessary to provide a diagnosis. This is about patient safety and the current referral requirements ensure that an underlying medical condition does not go undiagnosed.

The MCA is also concerned about some of the provisions in the bill that intrude upon the practice of chiropractic. Current law prohibits physical therapists from using chiropractic manipulative techniques whose end is the chiropractic adjustment of an abnormal articulation of the body. HF3240 removes this prohibition and essentially allows physical therapists to perform chiropractic adjustments without the training or education to do so. The MCA is strongly opposed to this particular expansion of scope. Additionally, the bill claims exclusive rights to the use of the word “physiotherapy” in describing treatment or modalities used, however this term has been included in the chiropractic scope of practice dating back to 1976 and could be used to describe many of the therapies that Doctors of Chiropractic use in their treatments.

The MCA has met with the APTA-MN several times recently and in the past to share the concerns outlined above. The MCA is committed to continuing discussions with the APTA-MN to ensure that patient safety and professional integrity are protected in Minnesota.

Yours sincerely,

Jacob Sundberg, DC  
President, Minnesota Chiropractic Association