



Open letter to Council Members
College of Physiotherapists of Ontario
375 University Avenue, Suite 800
Toronto, ON, M5G 2J5

September 20, 2021

Dear Council Members of the College of Physiotherapists of Ontario,

We are writing on behalf of the five Ontario University Physiotherapy Programs to express our concern about the fourth cancellation of the Physiotherapy Competency Examination (PCE) by the Canadian Alliance of Physiotherapy Regulators (CAPR) Board of Directors. We are also disheartened by the lack of a contingency plan in Ontario for how to address the ever-growing backlog of candidates waiting to complete this component of their licensing process.

Through this letter, the five Ontario University Physiotherapy Programs would like to urge the College of Physiotherapists of Ontario to position themselves as leaders in resolving this national crisis by considering the [most recent evidence regarding the use of a clinical examination](#)^{1,2} and alternate pathways to the traditional examination process. We also want to re-iterate to the Council that as accredited academic programs, Canadian Physiotherapy Programs have taken great strides to ensure that graduates from across the country are prepared to practice in a manner that upholds the standards and expectations of the Regulatory Bodies across Canada, including the College of Physiotherapists of Ontario. Through our [accreditation process](#) conducted by Physiotherapy Education Accreditation Canada (PEAC), we are required to demonstrate how we facilitate achievement of all entry to practice physiotherapy competencies and milestones outlined in the National Physiotherapy Advisory Group Competency Profile for Physiotherapists in Canada (2017). This rigorous process includes describing how we evaluate student achievement of each competency. Therefore, we are confident that the evaluations through the entry to practice curriculum have laid a strong foundation for ensuring the competency of our learners. Graduates of Canadian Physiotherapy Programs are therefore well prepared for entry to practice and meet required national competencies for entry to practice.

We are aware that the CPO's Registration Regulation (532/98) currently requires applicants to successfully complete an examination to qualify for a certificate of registration authorizing independent practice with the College (O. Reg. 68/06, s. 1). The Physiotherapy Act (the Act) defines the "examination" as an examination set or approved by the Council. While the Act references a practical

component of the examination (Provisional Practice, 23.3), the Act does not specifically define what constitutes an examination. As such, the Ontario University Programs would like to remind the Council that an email was submitted, by the five schools, to Mr. Rod Hamilton and Ms. Theresa Stevens on March 5, 2021 encouraging the CPO to:

- explore alternative policy and regulatory options that could be applied to ensure competency of the registrants who were unable to complete the clinical component of the examination due to cancellation ***and***
- consider an alternate form of examination that was proposed in the communication

We recognize that any solution implemented by the CPO would need to give due attention to the [Labour Mobility Act, 2009](#). We believe that the alternate examination we proposed for the Council's consideration would allow the CPO to meet its duty to protect the public and provide the people of Ontario with access to adequate numbers of qualified, skilled and competent regulated physiotherapists. We also encourage the College to use this proposal to facilitate dialogue with other Colleges of Physiotherapists across the country as a means of ensuring labour mobility requirements are met.

As a result of the most recent decisions by the CAPR Board of Directors, and the escalating crisis faced by the profession, the five Ontario University Physiotherapy Programs are ***again*** submitting for your consideration an alternative process that can ***immediately*** be used to address the needs of the public. There is an escalating crisis facing our profession. A pathway is needed to register the cohort of candidates who are currently without access to an examination, including those who hold a provisional practice registration and those who cannot currently hold a provisional practice registration.

Specifically, the Ontario University Programs would like to encourage the Council to explore if clinical examination using the established Assessment of Clinical Performance (ACP) completed by a physiotherapy supervisor or mentor could be used to examine the competency of the registrants to ensure the public's safety. The Canadian Physiotherapy ACP is an evaluation tool that has demonstrated [validity and reliability](#)^{3,4} in measuring entry to practice competency of physiotherapy learners across the country. The ACP has also been able to demonstrate a clear progression in competency from initial to final internship/ placement.^{3,5} There is a training module that has been developed to provide standardized application of this tool. The training module is freely available here: https://app.rehab.utoronto.ca/ACP/story_html5.html. We are aware that the proposed plan below will bring forward additional questions that will require discussion, including how to ensure neutrality of the assessor based on their relationship with the provisional practice certificate holder and how this assessment in one practice setting would be used to determine competence across settings. The University Programs welcome the opportunity to discuss this plan and collaboratively identify a solution with the CPO.

Specifically, the following is being respectfully re-submitted for the Council's Consideration:

1. ***Current Provisional Practice registration holders [inclusive of Internationally Educated Physiotherapists (IEPTS) to ensure equity]***: We are suggesting that supervisors/mentors of individuals who currently have held a provisional practice registration for a minimum of three months, should evaluate the registrant using the ACP to provide the College with a measure of competency. This examination would be used to satisfy the College's requirements for a

“practical examination”. Supervisors / Mentors would be required to submit the following three items to the College for each provisional practice holder:

1. Certificate of completion of the ACP training module
2. Completed ACP
3. A letter of support attesting to competency and acknowledging there were no known risks encountered during their mentorship relationship.

We strongly believe that these components would enable the College to meet the requirement for determining competence and protecting the public.

2. ***Candidates who have failed the examination, and are currently without access to Provisional Practice Registration [inclusive of IEPTS to ensure equity]***: We propose a three-step process over a 12 month period:

1. Prior to being re-issued a provisional practice certificate, these candidates must successfully satisfy the College that they are aware of, and competent with, the Standards by completing the College’s [jurisprudence module](#).
2. Individuals who satisfy criterion 1 could then be granted a Provisional Practice Certificate, with the requirement of having both an employer and clinical mentor, as well as a third-party evaluator (i.e. a physiotherapist with a similar practice background, faculty from an academic institution). The ACP can be implemented as a tool for evaluation at multiple points in time over a pre-determined timeframe (e.g. at 3 months and 6 months). If competency is satisfactory through this process, and there are no concerns expressed by the employer, clinical mentor and third-party evaluator, the individual Provisional Practice Certificate could be extended.
3. We propose the College also require a final examination using the ACP at 12 months following the first ACP evaluation. If no concerns are identified at that time, the registrant would be granted an Independent Practice registration.

Of note, the Saskatchewan College of Physiotherapists has used the ACP as one of two tools used to monitor the performance of physiotherapists who are placed on restricted licenses (the other tool is a system of chart audits). Candidates must be performing at entry level on all indicators before they can practice under indirect supervision.

As Ontario’s University Physiotherapy Programs, we would like to re-affirm our commitment to work with the College to find an evidence-informed and appropriate resolution to this urgent situation. We do not believe that the [current request for proposals](#) aligns with the best evidence on the continued use of a clinical examination, nor do we believe that establishing a clinical examination that mirrors the former CAPR clinical component is the best resolution to address the current backlog of registrants. As such, we strongly urge the CPO to reconsider the current RFP for a clinical examination and place your efforts on addressing the need for adaptation of the existing policies or by-laws that are placing barriers to innovative, evidence-informed solutions. We also urge the College to urgently commit to an evidence-based resolution that expedites the process for the registrants who have been practicing on the front lines, in a pandemic, while awaiting an opportunity to prove that they have acquired the knowledge and skills to safely practice at the level of entry to practice.

We would be happy to meet to discuss this proposal in more detail. Thank you for your focused and timely attention to this matter.

Sincerely,



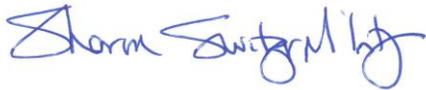
Dr. Sarah Wojkowski, PT, PhD, Assistant Dean, Physiotherapy, McMaster University



Dr. Alison Rushton, Director, School of Physical Therapy, Western University



Dr Stéphane Poitras, Director, physiotherapy program, University of Ottawa



Dr. Sharon Switzer-McIntyre, Program Director for both: MScPT Program and OIEPB Program, Department of Physical Therapy, Temerty Faculty of Medicine, University of Toronto.



Dr. Jordan Miller, Associate Director (Physical Therapy), School of Rehabilitation Therapy, Queens University

References:

1. Bobos P, Pouliopoulou DV, Harriss A, Sadi J, Rushton A, MacDermid J. A systematic review and meta-analysis of measurement properties of objective structured clinical examinations used in physical therapy licensure and a structured review of licensure practice in countries with well-developed regulation systems. PLOS ONE. Aug 3, 2021
<https://journals.plos.org/plosone/article?id=10.1371/journal.pone.0255696>
2. Physiotherapy Competency Exam SCPT AD HOC Working Group. A Review of the clinical component of the physiotherapy competency exam. Report and recommendations on the use of the PCE clinical component for physiotherapy licensure in Saskatchewan. May 2021
3. Mori B, Norman KE, Brooks D, Herold J, Beaton DE. Evidence of reliability, validity, and practicality for the Canadian Physiotherapy Assessment of Clinical Performance. *Physiotherapy Canada*. 2016;68(2):156-169.
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5. Wojkowski S, Norman KE, Stratford P, Mori B. Physiotherapy students' performance in clinical education: an analysis of 1 year of Canadian cross-sectional data. *Physiotherapy Canada*. Published online June 11, 2021. Available at: <https://doi.org/10.3138/ptc-2020-0018>.