



**ONTARIO
PHYSIOTHERAPY
ASSOCIATION**

September 21, 2021

Ms. Theresa Stevens, President

Mr. Rod Hamilton, Registrar

College of Physiotherapists of Ontario
375 University Avenue, Suite 800
Toronto, Ontario M5G 2J5

Via email

Dear Ms. Stevens and Mr. Hamilton,

The OPA appreciates the sense of urgency and priority that Council has placed on the achievement of a resolution to the growing number of candidates who currently do not have a path to independent licensure in Ontario. Nevertheless, the OPA remains deeply concerned that the actual achievement of a resolution may still be many months if not longer away. This will only exacerbate the hardship being experienced by those waiting to complete this process to practice within their chosen profession and amplify the growing health human resource crisis and access issues to physiotherapy care for Ontarians.

Under these circumstances we urge the College not to focus only on solutions relating to clinical examination but to commit to fully exploring all reasonable alternatives to find the most expeditious and effective solution to this urgent matter. This will require pursuing a concurrent, multipronged strategy consisting of multiple alternatives.

The alternatives the OPA proposes that the College rigorously pursue are:

1. Submit a proposal to the Ministry to make the necessary changes to remove the requirement of a clinical component to Registration Regulation 532/98. We understand that the College believes that it would take considerable time to implement. Nonetheless, it does represent a potential short and long-term solution that will allow greater flexibility in determining entry to practice processes especially in times like the pandemic.
2. Implement the proposal submitted by the Ontario University Physiotherapy Programs initially in March 2021 and repeated in their open letter to Council members dated September 20th, 2021.
3. Fully and quickly, examine the potential of granting exemptions (using the existing discretionary authority of the Registration Committee to do so) and register individuals or groups within the current regulatory structure.



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In the special meeting of the Council on September 20, 2021, The Council supported the option of developing a shared national examination in conjunction with other regulatory Colleges as well as continuing to pursue the RPF process for an Ontario specific exam. The OPA believes that the complexities of implementing a new provincial or national exam, even with the running start provided by existing examinations, will not achieve the objective laid out by the College of having the most expedient pathway to registration. In addition, with emerging research questioning the use of examinations with an OSCE based approach for the purpose of determining competence for entry to practice, efforts in this direction may result in further loss of needed resources and in substantially longer delays.

The OPA continues to offer its full support and resources to assist the College in whatever way we can to find and expedite a solution, or combination of solutions, that fulfil the College's public protection and access to health care mandates, while addressing the very serious predicament in which approximately 1000 physiotherapy graduates find themselves in in Ontario today. We trust this letter will be shared with the College Council and we look forward to our continued collaborations towards achieving our shared goal to expedite a path to registration for qualified candidates.

Yours sincerely,

Paulette Gardiner Millar

President

Cc Mr. Irwin Glasberg, Fairness Commissioner

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

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

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

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