



November 23, 2022

Ms. Theresa Stevens, President

Ms. Anita Ashton, Interim Registrar

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

Via email to: [consultation@collegept.org](mailto:consultation@collegept.org)

Subject: Consultation New By-law Consultation – Exam Fees

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Dear Ms. Stevens and Ms. Ashton,

The Ontario Physiotherapy Association (OPA) remains committed to working with the College of Physiotherapists of Ontario (CPO) and other stakeholders to successfully implement the interim pathway to full registration for independent practice in the province. In keeping with this commitment, we are writing in response to the consultation on the proposed bylaw change for the implementation of fees for the Ontario Clinical Exam (OCE).

The OPA supports solutions for registration that are accessible, fair, and equitable, and that address public safety through the mitigation of risk so to ensure that all who hold the title meet the standards of the profession. We acknowledge and applaud the work that has gone into the development and implementation of the Ontario Clinical Examination, in addition to the current exemption policy and the pathways to registration now available to candidates.

We have reviewed the rationale for the proposed bylaw for the OCE fee. We have also reviewed the rationale for the fee increase to all registrants that will be implemented in the next registration year. We note that likely, should the CPO not choose to apply fully the cost recovery approach used to calculate the OCE fee, the remaining costs would have to be assumed by all registrants which would be in addition to the increase already planned. For these reasons, at this time, the OPA supports the cost-recovery approach proposed amortized over the years that the exam is predicted to be in place and the number of candidates who will challenge the OCE during that time.

We do note that the costs associated with interim registration/licensing processes vary significantly across Canada with the CPO OCE being by far the highest fee, with the



closest comparator being British Columbia at \$1,400 for their exam, while other provinces are between \$150 to \$1,000 for either an exam or practice-based assessment. We acknowledge that the variances are due to many factors, including the risk profile that individual Colleges must address through their registration/licensing processes, the number of candidates presenting on an annual basis, and differences in regulatory regimes. However, OPA has some concern that the fee associated with the CPO OCE may have an impact on all current and future candidates who experience financial challenges, especially at this time due to the pandemic and delays in registration. This financial impact is often felt most strongly by internationally-educated candidates who face additional financial challenges associated with immigration and entry-to-practice preparation. We highly recommend that the bylaw associated with the OCE fee be reviewed at the earliest opportunity to ensure fees do not have an unintended impact on where candidates choose to pursue registration/licensing and, in turn, on the supply of physiotherapists in the province.

Thank you for this opportunity to participate in this consultation. We would be pleased to meet with you to discuss this submission if you should have any questions or comments.

Sincerely,

A handwritten signature in black ink that reads "O. Cheifetz".

Dr. Oren Cheifetz, PhD, PT  
President

A handwritten signature in black ink that reads "D. Sauvé".

Dorianne Sauvé  
Chief Executive Officer