

April 18, 2024

The Honourable Sylvia Jones
Deputy Premier and Minister of Health
777 Bay Street, 5th Floor
Toronto, ON M7A 2J3

Submitted via Email to sylvia.jones@ontario.ca

Dear Minister Jones,

Re-: Physiotherapy Scope of Practice Expansion-Closing the Loop

I attach a copy of a letter to you dated August 8, 2022. I'm prompted to write to you once again, given the lack of any progress by the Ministry on completing an exercise that began nearly two decades ago that resulted in much-needed scope of practice changes for physiotherapists, but with two elements still awaiting full completion.

The two scope of practice changes for physiotherapists that remain outstanding in terms of implementation are:

1. **Ordering diagnostic imaging.** The requisite amendments to the *Healing Arts Radiation Protection Act* were passed by the Ontario Legislature in December 2009 and were proclaimed into force and effect on April 1, 2018. **What is still needed is the final enabling regulation change under the *Healing Arts Radiation Protection Act*.**
2. **Ordering Laboratory tests.** No statutory amendments are required. **What is still needed are regulation amendments under the *Laboratory and Specimen Collection Centre Licensing Act*.** Those regulation amendments were endorsed by the Health Professions Regulatory Advisory Council and their enactment was promised in 2009 as part of the larger package of scope of practice changes for the profession.

While these remaining scope of practice changes have been in limbo since 2009, scope of practice changes for other healthcare professions – even those involving the same regulations required to finally implement the two outstanding scope of practice changes for physiotherapy – have been enacted by this government, most recently for midwives. We heartily support and endorse those scope of practice changes as they contribute positively to the healthcare system in Ontario, but we cannot help but wonder why the same attention has not been given to physiotherapy. As a consequence of that inaction, Ontario's physiotherapists now work within a scope of practice more limited than their colleagues in other Canadian provinces, including Alberta, Québec and Nova Scotia.



We are given to understand that the Ministry is currently reviewing its response to requests by professions to order diagnostic tests. I would like to point out that ours is not a request to expand diagnostic tests per se, but instead a request to complete the implementation of diagnostic tests that were recommended by HPRAC after an extensive review, subsequently confirmed via a review by the Ministry, enabled by legislation passed by the Legislature 14 years ago (in the case of prescribing x-rays) and subsequently reinforced by the OPA and the College of Physiotherapists of Ontario multiple times.

I reiterate that the College of Physiotherapists has put in place all that is necessary in terms of the regulatory framework to ensure that these additional authorities are exercised only by registrants who are fully competent to perform them safely and effectively. I also reiterate that the OPA has done everything asked of it by the Ministry and has done so multiple times in order to give the Ministry the information it needs to move forward.

The positive impact on Ontario's healthcare delivery system and on patient outcomes generated by dispensing with the need for circular referrals, more timely diagnoses and treatment and lower utilization of these diagnostic tests has been extensively quantified and demonstrated in other jurisdictions and await long-overdue implementation in Ontario.

I am hopeful that this letter prompts you as Minister to action whatever work is necessary to finish a task that began nearly two decades ago without any further delay. OPA would be pleased to assist you in moving forward and completing the implementation of the full scope of the physiotherapy profession on behalf of Ontarians and our health system and responses on this matter can be addressed to Amy Hondronicols, OPA Director Practice, Policy and Member Services, at ahondronicols@opa.on.ca.

I and all physiotherapists across Ontario anxiously look forward to your prompt response.

Sincerely,

A handwritten signature in black ink, appearing to read "Courtney Bean", with a stylized flourish at the end.

Courtney Bean, PT, DMT (cand)
Ontario Physiotherapy Association
President
president@opa.on.ca

cc: France G elinas, MPP
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