

Nov 24, 2024

Nitin Madhvani, President

Craig Roxborough, Registrar & CEO

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

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

**Subject: Consultation on proposed Standards, round 4**

Dear Mr. Madhvani and Dr. Roxborough,

Thank you for the opportunity to participate in the consultations on the three proposed standards; we offer the following feedback for your consideration.

#### Standard: Advertising and Marketing

This Standard replaces the existing Advertising Standard and is well organized with clear language. The new standard includes important elements from the existing standard, such as restrictions around claims of superiority or comparisons, and that the physiotherapist is responsible for any advertising related to their services. The clarity in the proposed standard on using the specialist term is particularly helpful.

One element that is not captured by the proposed standard is any clarification about bundling of services and the need to maintain options for individual services. This expectation is noted in the proposed Funding, Fees and Billing standard, but it is important to include it here as well. It may also be helpful to include reference to Canada's anti-spam legislation and that all businesses and organizations, including those related to healthcare, must comply with this legislation.

#### Standard: Documentation

This Standard replaces the existing Recording Keeping Standard. The proposed standard is clear and direct, with improved clarity on how to document working with a physiotherapist assistant. OPA has identified a few elements where greater clarity or additional information would enhance this proposed standard.

Components of a complete patient record, as outlined in the proposed standard, includes the financial record. It is important to clarify if the full financial record is part of the patient's health

information, or what elements are separate and distinct. This section also outlines the need to include details or copies of all verbal or written communication related to patient care, and we recommend including that the medium of communication be recorded, to specify if it is a phone call or an email, for example. Additionally, it would be very helpful to expand on what verbal or written communication might be included that is related to clinical care – perhaps an added definition of what constitutes a patient encounter with examples would be helpful, similar to definitions sections of other standards.

Under Quality of Documentation, there is guidance to clearly document changes to a patient record, including who made the change, the date, and why the change was made. As many physiotherapists use Electronic Medical Record (EMR) systems, it would be helpful to comment if the changes recorded by EMRs are sufficient, as many EMRs document who made any changes, and the date and time of the change.

The existing Recording Keeping Standard includes several elements that are important to include in the proposed standard:

- The existing standard includes the requirement that records must “use appropriate, respectful, and non-judgmental language.”
- The existing standard also details more elements of record keeping that are not present in the proposed standard. OPA recommends maintaining mention of the following elements:
  - Care refusals
  - Tests results and reports received
  - Details about analysis, diagnosis (in the proposed standard only assessment findings are mentioned)
  - Referrals, transfers of care and any reports sent related to the patient’s care
  - Discharge summaries including reason for discharge and other recommendations
- The proposed standard also does not reference the Personal Health Information Protection Act (PHIPA) and the requirements to communicate to the patient who has custody and control of their personal health information, how it will be managed, and how they can access their records or request changes. It is essential that the documentation standard is reviewed for concordance with PHIPA, and includes explicit instruction that all documentation must adhere to the requirements of PHIPA.

There is an opportunity to further modernize this standard, by explicitly mentioning how to evaluate the use of Artificial Intelligence (AI) when completing documentation. The use of AI must adhere to all PHIPA requirements, and so it may be sufficient to highlight that link.

### Standard: Funding, Fees and Billing

This Standard replaces the existing Fees, Billing and Accounts Standard. The proposed standard is comprehensive and clear. The OPA offers two suggestions to enhance the proposed standard.



**ONTARIO  
PHYSIOTHERAPY  
ASSOCIATION**

The performance expectation that physiotherapists maintain current knowledge of funding sources for physiotherapy services could be expanded to include direction to inform the patient of options when they exist. OPA suggests the statement be revised to the following:

- “Maintains current knowledge of relevant funding sources for physiotherapy services, informs the patient of those funding sources so the person can make an informed choice, and complies with funding requirements, policies, and procedures.”

One additional performance expectation from the existing standard that we suggest being considered for inclusion in the proposed standard is that a physiotherapist must not charge or accept payment for a service that has been paid for in full by another payor.

In closing, we appreciate the opportunity to provide feedback on this consultation. We would be pleased to meet with you to discuss the points we have made in this submission.

Sincerely,

Sarah Hutchison, MHSc., LL.M, ICD.D  
[shutchison@opa.on.ca](mailto:shutchison@opa.on.ca)  
Chief Executive Officer  
Ontario Physiotherapy Association

Amy Hondronicols, PT, PhD  
[ahondronicols@opa.on.ca](mailto:ahondronicols@opa.on.ca)  
Director, Practice, Policy & Member Services  
Ontario Physiotherapy Association