

June 10, 2025

Katie Schulz, Board Chair

Craig Roxborough, Registrar & CEO

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Submitted via email to: consultation@collegept.org

Subject: Consultation on General Regulation

Dear Ms. Schulz and Dr. Roxborough,

Thank you for the opportunity to provide input on the proposed changes to the General Regulation on Registration, specifically regarding the removal of the Provisional Practice class.

We have heard from our members, students and practising physiotherapists on this consultation, and have developed our response with careful consideration of their concerns, the priorities of the OPA Board of Directors, and a robust understanding of the healthcare landscape. We are deeply concerned about the system-wide implications of eliminating the Provisional Practice class, and we respectfully urge the College to consider a new class of registration that enables educationally qualified physiotherapists to practise as residents prior to independent registration. Based on the health system experience in responding to COVID-19 and the challenges faced by the profession, it is essential to offer or have available a provisional or temporary registration pathway to ensure a readiness to manage any unexpected risks and circumstances.

It is our view that the College must consider the impact of not being able to practice after an unsuccessful exam attempt and provide support for a remediation pathway for candidates to continue practicing under specific terms, conditions, or limitations, such as the solution implemented by the College during the COVID-19 pandemic. In a single exam model, the same concerns persist in the pre and post exam timeframe. OPA has overwhelmingly heard concerns about both timing and capacity of the current two-exam model to accommodate all current applicants, as well as the significant risks of discontinuing the current licensure pathway without overlap and load testing of the new model. OPA strongly advises the College to extend offering the OCE to at least the end of Q1 2027 to mitigate such risks and to provide the opportunity for all PTs who are waiting to challenge the OCE an opportunity without forcing them into the new single exam.

Although this consultation does not include feedback on the new single national exam process, it is essential to ensure that the new single exam has the capacity to allow everyone to challenge it

in a timely way following Canadian PT programs completion, in August/September, while also recognizing that not all candidates follow the same timeframe for challenging the exam due to personal or extenuating circumstances. While CAPR's capacity is one consideration, a singular focus on this is insufficient as it does not recognize the impact of delay in access to exams for qualified candidates, employers and the public accessing care. The administrative processes may not be streamlined, and coordination between the schools, CAPR and the regulator may need to be addressed.

Summary of Recommendations

Establish a new Temporary Class of Registration for physiotherapists based on existing competencies, including Canadian graduates and some internationally educated candidates, with supervised practice and options for those who do not pass the national exam. Ensure fair, equitable, timely exam access, as well as clear and transparent communication with all partners about regulatory timelines and expectations.

Preparedness & Responsiveness

The lessons learned from the challenges to registration during the pandemic are instructive at this time. One key takeaway is the importance of ensuring regulation and policy can be responsive in emergencies and have adequate flexibility while still maintaining safety and competence. Without a provisional or temporary class of registration, it is not clear how registration with the College will be responsive to any unexpected or unforeseen delays in the process.

- A temporary class of registration would enable greater flexibility with the benefit of advance planning rather than a reactive response.
- Provide a clear articulation of how registration pathways can be responsive to unexpected circumstances and risks.

Competence Retention

If there is a waiting period between eligibility to challenge the exam and the exam date, there are concerns with maintaining or improving competence, as well as public access to physiotherapists. Of additional concern, is the current inability to practice if a candidate fails a licensing exam. To promote improved competence and connection to professional development in the physiotherapy community, an opportunity to continue to practice, albeit with supervision, must be in place. A registration pathway that fosters sustained improvements in competency – lifelong learning, as set out in the Competency Profile for Physiotherapists in Canada – must be established.

- Without access to a temporary class of practice, Canadian PT graduates and IEPTs are more likely to prepare narrowly for exam performance rather than long-term, sustainable professional development. This may compromise the retention of essential clinical knowledge and skills, ultimately put the public at risk both due to quality of care issues and reduced availability of physiotherapists to enter the workforce permanently.

Health Human Resources (HHR) Concerns

Ultimately if people qualified to challenge the exam have to wait and are not connected to the physiotherapy profession, their competence and confidence may be impacted, and they may choose to leave the profession. Although the College's role does not include recruitment to the physiotherapy profession, a consideration of the impact of health human resources on the public's access to quality care is an issue of safety.

- Ontario's HHR strategy includes streamlining the registration path for healthcare workers, so they can enter the workforce more quickly. It is appropriate to recognize and consider the rigorous competency assessments that take place before a single national exam.
- In addition to 1025 hours of clinical placements, all programs are accredited and based on national entry-to-practice standards as published by the Physiotherapy Education Accreditation Canada (PEAC), and students must successfully challenge academic and clinical exams. The Assessment of Clinical Performance requires a student to maintain a full independent caseload, including patients with complex needs, in the final placement for successful completion. These assessment methods demonstrate capacity for a temporary class of registration for graduates of Canadian physiotherapy programs.
- Without a pathway to begin working in their chosen profession immediately upon graduation, students are faced with longer periods of unemployment and debt accumulation—factors that disproportionately affect equity-deserving groups, and students without financial support.
- In terms of labour mobility, it is a priority of the current Ontario government to remove barriers and support interjurisdictional movement of qualified health professionals. Removing provisional registration will not only disadvantage graduates but also place additional strain on healthcare employers, particularly hospitals and underserved regions. Organizations rely on new graduates to fill vacancies and meet growing demand. If Ontario eliminates Provisional Practice, we risk losing future physiotherapists to jurisdictions with more accessible licensing pathways, such as Quebec, Saskatchewan, or international locations.

Comparison across Physiotherapy in Other Jurisdictions:

- **Quebec:** The rigor of accredited physiotherapy education programs enables the exams and assessments that are part of program completion to be sufficient assessment of competence and practice readiness. The regulatory College works closely with the PT programs to ensure that competencies are achieved, and all required assessments and examinations are met during the program, allowing graduates to obtain an independent practice license immediately upon graduation without an additional exam requirement.



- **Saskatchewan:** Currently, the Saskatchewan College of Physical Therapists offers a restricted license category for those who have successfully completed the written PCE and are awaiting their secondary examination. After the transition to the single national exam, the College will be using a provisional practice license which can be obtained with proof of graduation, proof of employment with a supervising physiotherapist, and registration for the Canadian National Physiotherapy Examination (CPTe).
- **Nova Scotia:** While the Nova Scotia College of Physiotherapists will not be offering a provisional practice license when the CPTe is implemented, under the current two-exam system, the College allows residents to continue practicing after one failed attempt of their provincial competency exam. Only after two failed attempts does the College rescind a provisional practice license.
- **California:** Graduates from physical therapy programs in California are entitled to pursue a “license applicant status” by way of a jurisprudence exam after they register for their single licensing exam, allowing them to practice until they challenge their exam.
- **Ireland:** Graduates can register with the Irish Society of Chartered Physiotherapists immediately upon successful completion of their physiotherapy program. It is important to note that Ireland is on Canada’s list of countries with equivalent education.
- **Australia:** Also on Canada’s list of countries with equivalent education, Australia allows graduates from accredited physiotherapy programs in Australia to register with the Physiotherapy Board of Australia immediately upon graduation. There is no licensing examination in Australia, as their programs are deemed sufficient to measure competency and practice readiness.
- **New Zealand:** A third country on Canada’s list of countries with equivalent education, New Zealand does not have a licensing exam, and it allows graduates to register with the Physiotherapy Board of New Zealand immediately upon graduation.

Internationally Educated Physiotherapists

- IEPTs pursuing licensure in Canada already follow a different pathway than Canadian graduates. Recognizing and addressing these differences is essential when considering changes to the Provisional Practice class.
- While we understand the CPO’s concerns around practice readiness, we encourage exploration of a phased or pilot approach to ‘fast-tracked’ IEPTs from countries determined to have equivalent educational standards for the credentialing process – USA, Ireland, South Africa, Hong Kong, Australia, New Zealand, and the United Kingdom. Exploring temporary practice options for these candidates will play a key role in alleviating physiotherapist workforce shortages in Ontario, and build effectively on CAPR’s work in this area. To be eligible for the credentialing process, all IEPTs are required by CAPR to complete one of two courses on the Canadian practice context, either from the University

of Toronto or the University of Alberta. With the education credentialling and Canadian context elements, OPA urges CPO to consider IEPTs from this group to be eligible for a temporary class of registration, similar to Canadian graduates.

- There are three countries on CAPR's pre-approved credentialling pathway list that reciprocally classify Canadian physiotherapy graduates as equivalently educated. In these countries, there are no licensing examinations, and Canadian physiotherapists who wish to practice in these countries are not required to write an examination. Their credentialling processes are simple and streamlined and consist of 1) proof of an unrestricted Canadian physiotherapist license; 2) proof of Canadian education at an accredited physiotherapy program; 3) English proficiency; and 4) a short, online cultural competency module.

Comparison to Other Regulated Health Professions

Other health professions in Ontario have a single examination process that is completed after graduation from an accredited program while allowing for provisional, transitional, or temporary classes of registration. A robust understanding of how safety and competence is considered in these models is necessary to inform changes to physiotherapy Provisional Practice.

- **Occupational Therapy:** A single national exam is required, but Ontario allows a Provisional Registration class for eligible candidates.
- **Speech-Language Pathology & Audiology:** Graduates may obtain an Initial Certificate after school and before their exam, valid for up to 18 months.
- **Respiratory Therapy:** Provisional practice certificates are available upon graduation while awaiting their licensing exam. They can perform controlled acts under supervision and this certificate is valid for 18 months from the date of issue.
- **Nursing:** Temporary registration is granted for graduates before they sit the licensing exam or after a first failed attempt, allowing them to work if they have a job offer.
- **Pharmacy:** Ontario pharmacy graduates can work under provisional practice before passing their licensing exam. They can register as pharmacy interns and practice to their full scope of practice under supervision of a Pharmacist while waiting to complete their qualifying examination.
- **Psychology:** Ontario psychology graduates can practice as Psychological Associates under supervision before challenging their licensing exams. Candidates who are unsuccessful in their licensing exam can continue to practice provisionally while they prepare to re-write.
- **Dietetics:** Graduates can register as "Registered Dietitians" while actively working towards full registration. Their provisional practice certificate is valid for 18 months, and they cannot supervise other dietitians. Candidates who are unsuccessful in their licensing exam can continue to practice provisionally while they prepare to re-write.

- **Midwifery:** A transitional certificate of registration is available to graduates before they challenge their licensing exam. Candidates who are unsuccessful in their licensing exam can continue to practice provisionally while they prepare to re-write.
- **Optometry:** Graduates can practice under a licensed Optometrist's delegation with a provisional practice certificate before passing their licensing exam.

These models demonstrate that provisional or temporary licensure under supervision is a widely accepted and effective means of transitioning graduates to full practice while safeguarding the public, after graduation or after a failed exam attempt. Physiotherapy graduates who are unable to work in their field may become disconnected from the profession, increasing the risk of repeated exam failure and attrition from the workforce altogether.

Professions in Ontario that currently have only one class of registration are Kinesiology and Chiropractic Care.

Examination Consideration

The risk of failure and unforeseen challenges in the move to adopt a single national exam and subsequent registration as a physiotherapist are too great to proceed without additional mitigation strategies. The College must ensure that moving away from the current two-exam process does not disadvantage or negatively impact timing for independent practice, and that a plan for addressing any potential problems or gaps for candidates is clearly communicated, which may arise from exam availability or unexpected issues with the new exam.

Regardless of the changes in registration classes, the transition to practice must be efficient and predictable:

- The entry-to-practice exam should be scheduled after the completion of physiotherapy programs.
- Students should be able to register for the exam before program completion.
- CAPR must ensure sufficient capacity to accommodate all Canadian graduates immediately after program completion, particularly around September, as well as account for IEPTs progressing through the credentialing processes. The College must also consider that not all candidates from Canadian programs will challenge the exam immediately after program completion.
- Clear timelines must be published for exam dates, result release (e.g., 4 weeks), and the subsequent registration process, with clear accountability measures in place if targets are not achieved.
- Multiple exam sittings throughout the year (currently 10) must continue and be accessible to avoid unnecessary delays in employment.
- Robust technical and logistical contingency plans must be in place for the exam platform.



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- Candidates who are unsuccessful in the national exam should be able to continue to practice provisionally to maintain their clinical skills and promote **long-term quality of care for the public**.

Summary of Recommendations

1. **Create a new Temporary Class of Registration of Physiotherapists** with eligibility based on already established competencies, including graduation from a Canadian physiotherapy program. Practice in the temporary class would include supervision.
2. **Include in a Temporary Class of Registration candidates who are not successful in challenging the new national single exam**, potentially with additional supervision requirements. This inclusion may extend to 2-3 attempts.
3. **Explore similar pathways to Temporary Registration for IEPTs**, starting with candidates from the pre-approved credentialing pathway.
4. **Ensure timely, fair, equitable, and accessible exam scheduling** to support prompt workforce integration.
5. **Communicate clearly and transparently** with all partners—students, applicants, educators, and employers—about regulatory timelines and expectations, including a readiness plan for managing adverse and unexpected events.

The current Provisional Practice class serves the dual purpose of protecting the public and supporting a robust, well-integrated physiotherapy workforce. Removing it will create more problems than it seeks to solve and hinder progress toward HHR goals in Ontario.

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,

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