



Reducing Barriers to Registration and Practise for Regulated Health Professionals Registered in other Jurisdictions

April 30, 2025

INTRODUCTION

The Ontario Physiotherapy Association (OPA) is pleased to have the opportunity to respond to this proposal on behalf of its 5500+ members across the province.

There is clear evidence that Ontario (along with Canada) faces an unprecedented Health Human Resource (HHR) crisis as confirmed by the pan-Canadian study "Caring for Canadians: Canada's Future Health Workforce". The physiotherapy profession in Ontario is experiencing significant challenges in recruitment and retention of physiotherapists across the province in all areas in which our members practice. (Home & community, primary care & CHCs, publicly-funded clinics, hospitals, private-practice). The inclusion of physiotherapists in the "As of Right" Ontario model is an important opportunity to support increased labour mobility across the country. That said, given that HHR shortages are a national issue, we anticipate that it is unlikely to make a substantive difference in easing the pressures that Ontario faces.

The OPA is ready assist the Ministry of Health, the Government of Ontario and other regulated professions in the implementation of measures that are, or can reasonably be expected to be, effective to rectify the HHR situation.

Current Registration Processes

Graduates of accredited Canadian physiotherapy programs, and in good standing with their health regulatory College, should face few challenges at a registration level. Internationally educated physiotherapists who are licensed in another provincial jurisdiction with an independent practice licence also should be recognized interprovincially. The registration 'conditions' as set out in the proposal are consistent with requirements for physiotherapists currently. Ultimately the time for registration, the regulatory fee model in the province and how fees are managed is a matter for consideration by the regulatory colleges.

Patient Safety and Quality of Care:

Expanding the practice settings in which regulated health professionals can work will improve access for patients. The HHR needs extend far beyond hospitals and LTC settings, and many of our most vulnerable and under-served patients require expanded access to inter-professional care and physiotherapists particularly.



Benefits and Risks:

Risks: The scope of practice for physiotherapy in Ontario is more restrictive than the scope of practice in many other provinces given that Ontario has yet to enact regulations that enable scope consistent with the advances in other jurisdictions. It is less likely that physiotherapists from other provinces would migrate to Ontario to practise in a more limited scope than their current practice. There is a potential risk that if other jurisdictions adopt reciprocal "As of Right" provisions then physiotherapists may leave prompted by the attraction of practising to the full extent of their competencies elsewhere. This risk can be quickly mitigated by the Ministry by completing the regulations for the outstanding scope of practice changes that enable the authority for physiotherapists to order diagnostic imaging and laboratory tests; this was recommended by HPRAC and approved in the Physiotherapy Act, 1991 over a decade ago.

To summarize, the lack of harmonization of scope of practice across the country poses a far greater risk to migration than regulatory considerations.

Implementation:

"As of Right" provisions are novel in Canada's health professions regulatory system and may entail a risk in terms of public protection. In considering the implementation pathway as this model expands, it would be useful to know how many out-of-province practitioners have actually migrated to Ontario under the "As of Right" provisions already in place for physicians, nurses, respiratory therapists and medical laboratory technologists and to understand the experience with both a regulatory and patient experience perspective.