



Manitoba Association
Physiotherapy Association
manitobaine de
physiothérapie

April 28, 2021

College of Physiotherapists of Manitoba
1455A Pembina Highway
Winnipeg, Manitoba
R3T 2C5

Dear CPM Council, Board of Assessors, and Registrar,

As we write this letter, Manitoba is entering the third wave of the Covid-19 pandemic. We have been fortunate that we have been able to advocate for physiotherapy services to stay open and for front-line staff to be a priority for the vaccine roll-out. This is because physiotherapy care of patients is essential in Manitoba. What we have not been successful at during this unprecedented time is supporting our newest colleagues, and advocating for the future and value of our profession.

As you are aware, the Canadian Alliance of Physiotherapy Regulators (CAPR), was forced to cancel the March 2021 Physiotherapy Competency Examination (PCE) clinical component due to a system failure. This came after the cancellation of the June 2020 exam due to COVID-19, as well as the following sitting of the exam scheduled for November 2020. It is extremely disappointing that after having a full year to prepare, CAPR has still not been successful in adapting and delivering the clinical component of the competency exam. We must commend CAPR for the attempt to be flexible with a switch to virtual testing. But unfortunately, it did not turn out as expected and now hundreds of future Canadian physiotherapists are left in limbo.

The Canadian Physiotherapy Association (CPA) made a public statement after this third cancellation calling for “a suspension of the requirement for candidates to complete the clinical component of the PCE in order to obtain their license”.¹ The Canadian Physiotherapy Association (CPA) recently issued a statement calling for TRANSPARENCY, ACCOUNTABILITY, and EQUITY for PCE candidates with the following specific action points to be delivered on or before May 28/2021:

1. Set out a specific exam timeline for candidates.
2. Provide a firm plan for exam roll out, including details about how CAPR will ensure equitable treatment across all candidates; and
3. Commit to bi-weekly updates for candidates and partners.

As the Manitoba Branch of CPA, we support this call to action to the Provincial Regulators, and as such we are writing to you today to urge swift, concrete action to remedy the situation.

The physiotherapy community is stepping forward with suggestions for more efficient and safer platforms for the delivery of the PCE, in the event that the PCE cannot be waived entirely. Some suggestions include:

1. Use of colleges, universities and clinics across Canada as venues to run small pandemic-safe face to face exams.

2. Enlist university physiotherapy programs to run the exams in-person. All the machinery and processes already exist; all that is missing is the exam questions.
3. Use of a smaller, simpler platform (e.g. Zoom) for the virtual clinical component, which is a proven, ethically approved technology that already exists in centers across the country.
4. Use of well-trained, licensed and practicing physiotherapists (there are 15K CPA members to choose from) who could act as the standardized patients and the examiners. We have been delivering safe care and education throughout the pandemic and are well-versed in the use of PPE and all public health measures and sanitation methods required to keep everyone safe.
5. Use of Health Canada approved rapid testing of candidates, “patients” and examiners. Results are available within 15 minutes.

The big question at this time is how many attempts is enough? This has already been going on for too long. It is hard enough on physiotherapists in public and private practice working during a pandemic with all the unique challenges they are each facing in their disrupted work environments; the extra toll on the exam candidates as they continuously study and prepare for an exam that repeatedly gets postponed is unacceptable and unnecessary. We are in a global pandemic, and these unprecedented times need to be taken into consideration. This is especially frustrating, considering other professions such as Medicine² and Massage Therapy³ have updated their licensing processes accordingly.

The inability to obtain a full physiotherapy license for current candidates has far-reaching implications. The cancellation of this exam not only impacts the candidates and their families, but it impacts hospitals, long-term care homes, community physiotherapy services, school physiotherapy services, private physiotherapy clinics, our patients and communities, and the sustainability of the physiotherapy profession itself. Please refer to the exhaustive list in the appendix of all the ways in which the exam delay is negatively impacting people and the physiotherapy profession.

There comes a point where we must realize, as a profession, that desperate times call for desperate measures. What is CAPR’s and CPM’s plan if the PCE exam cannot be offered through alternate venues or platforms as suggested previously in a timely fashion? What actions should we take now as a profession to show we value our role in health care delivery in Manitoba? By not allowing our exam candidates to gain licensure during a pandemic, it suggests that our services are non-essential and that our roles are easily replaced by other professions. This will have long-lasting effects on all current practicing physiotherapists and future generations of physiotherapists. It will, if it hasn’t already, also negatively impact the public who may not be able to access physiotherapy care in a timely fashion or who may resort to other health care providers who are not as well-trained in the delivery of many of the skills within our scope of practice. We may lose colleagues before they have even begun their careers, as they just cannot wait any longer for full employment and full pay, and the respect that they deserve as physiotherapists.

We strongly urge CPM to implement the use of a more efficient platform to ensure a timely restoration of licensing services to our thousands of Canadian graduates who remain in professional limbo. If this cannot be achieved within a few months’ time, we press the College to suspend altogether the requirement to complete the clinical component of the PCE. CPM’s regulations seem to permit that authority (see link below), and it would acknowledge that the harm in postponing the exam process further far outweighs any perceived risk of allowing candidates full licensure without a national practical exam.

CPM Regulations (<https://www.manitobaphysio.com/wp-content/uploads/Regulations.pdf>)

Definition of 'examination' on page 3: *““examination” means the Physiotherapy Competency Examination administered by the Canadian Alliance of Physiotherapy Regulators, or an examination approved as equivalent by the council”*

“When examination not required 4(2): Despite subclause (1)(a)(i), where the board of assessors is satisfied, based on an assessment of an applicant's prior learning and experience, that he or she is qualified to practice physiotherapy, the applicant is not required to take the examination.”

As well, we implore CAPR to RETURN ALL COLLECTED FEES for exams that have not been carried out. In reflecting on the issues that this global pandemic has created for CAPR'S ability to deliver exams efficiently, we believe it would serve our profession well to REVISE THE LANGUAGE IN BYLAWS AND POLICIES to ensure that we are never put in this situation again. This revision could outline conditions under which the need for an in-person exam could be overridden.

As stated by CPA, “the emotional and financial toll this has taken on candidates cannot be justified”⁴, and such impacts can be extended to include all the physiotherapy workplaces in our province. We urge CPM as our Provincial Regulator to take these far-reaching impacts into careful evaluation, and to implement the CPA's recommended actions of suspending the requirement of the clinical component of the PCE OR take immediate action as part of CAPR to create a deliverable and Covid-safe PCE.

Sincerely,



Nancy Goodall on behalf of the MPA Board of Directors

cc:

John-Paul Cody-Cox
Canadian Physiotherapy Association, Chief Executive Officer

Jim Hayes
Manitoba Physiotherapy Association, Executive Director

Appendix:

Below is a non-exhaustive list of the ways that this delayed licensure of therapists has affected clinical practice.

1. Decreased access for patients:

- Due to supervision requirements (i.e. supervisor must be available during the interim therapist's shift) our interim physiotherapists' hours of work are significantly limited. Please recall that we are operating under the physical distancing measures of a global pandemic. Two bodies to deliver service to one patient means we are not efficient in our delivery as our capacity is decreased.
- Decreased perceived access for patients. It is a requirement to indicate when a physiotherapist interim is registered, and this is a factor that can deter patients from scheduling an appointment.
- Decreased access to specialized services. Interim registrants are not able to offer all the specialized services that fully registered therapists can.

2. Increased mentorship and supervision requirements:

- Interim physiotherapists require supervision plans as part of their interim license. This means that their supervisor must spend extra time ensuring these requirements are met including scheduling meetings, reviewing charting and billing, consulting on cases, and being available or on-call as needed. This mentorship puts a strain on businesses and budgets when the interim registration times are prolonged.

3. Decreased pool of applicants to keep up with an increasing demand for physiotherapy services:

- The demand for physiotherapy continues to grow in our communities. This leads to an increased number of physiotherapy positions open in our province, and with a lower number of candidates receiving their license, the number of jobs vacancies continue to rise. The areas that are already under serviced will remain so, or the duties will be assigned to other health care professionals.

4. Decreased ability to benefit from continuing education:

- The Master of Physical Therapy education provides physiotherapists with the base level of knowledge required to practice in Canada. It is up to individual therapists to further their education to fill the gaps in their knowledge or gain more in-depth knowledge related to their field. Until physiotherapists have completed the PCE, they are often unable or unwilling to take continuing education courses, which stunts their progress in their careers, decreases their skills in any specialized fields, and ultimately diminishes their ability to improve their skills.
- Interim therapists are unable to participate in specialized programs (such as the Registry of Autism Service Providers) and training (such as Dry Needling) which may delay their career development.

5. Financial Loss:

- Interim physiotherapists have felt unable to work full-time due to the significant study requirements to prepare for the PCE, and have required time off or further reduced their clinical hours each time they believe they are going to write the exam. This has cost the individuals and clinics significantly in lost income, especially for those who have now repeated this process three times.
- Candidates have been short \$2000 for over a year, which could have been earning interest in their own bank accounts.
- The uncertainty and volatility of interim registration is a risk to employers, directly impacting a clinician's ability to find a job or receive a promotion.

1. <https://physiotherapy.ca/cpas-statement-cancellation-virtual-clinical-component-physiotherapy-competency-examination-march>
2. <https://www.royalcollege.ca/rcsite/credentials-exams/exams-dates-locations-e#exam-centre>
3. <https://cmtbc.ca/applicants/registration-examination/exam-components/#pba>
4. <https://physiotherapy.ca/cpas-statement-cancellation-virtual-clinical-component-physiotherapy-competency-examination-march>