



Denis Pelletier  
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25 June 2021

**Subject: Open letter to Canadian Alliance of Physiotherapy Regulators (CAPR) Board of Directors, regarding the Clinical Component of the Physiotherapy Competency Examination (PCE)**

Dear M. Pelletier,

On behalf of the CPA, we extend our congratulations and welcome to you in your role as President, CAPR Board of Directors. We look forward to your leadership and continuing to work with CAPR to find solutions within the current PCE plan and, hopefully, toward the development of an alternative solution that will benefit the patients served by the physiotherapy profession.

We are writing today to request assurances from the members of the CAPR Board, each of whom represents a provincial physiotherapy regulator, that they will return to their respective Councils and Registration Committees to request consideration of the following:

*Should the CAPR exam not proceed as planned, an alternative, national and unified measure will be implemented to enable candidates to prove their competence to achieve entry to practice licensure by the end of 2021.*

The CPA is a member Association which represents the interests of 16,000+ members, most of whom are registered physiotherapists. As the organization that represents the “self” in a self-regulated profession, we take our responsibility seriously. We advocate, support and speak for our members on a wide array of issues. Since the first cancellation of the PCE Clinical Component in March 2020, we have represented and continue to represent the perspectives and voices of our members. We are writing now to reaffirm our position related to the licensing process for Canadian physiotherapists, in a time of pandemic. We stand by our [original statement](#) issued on March 21<sup>st</sup> 2021. This statement reflects the position of the CPA Board of Directors and is supported by all Provincial Branches. To ensure clarity, we asked for the following:



1. CAPR to immediately return all fees collected from candidates who are waiting on the clinical component of the PCE.
2. The provincial Regulators (Colleges) to suspend the requirement for a completion of the (now unavailable) clinical component of the PCE to be eligible for licensure in every province.

We recognize that each province has a unique legislative and regulatory framework, and we trust in the capability of each Council to drive this conversation. For this reason, our statement is clear in its mandate and less directive on how to achieve it. When released, we recognized that our statement was not well received by our partners. We know that legislation and regulation does not change overnight, and we continue to respect the role and authority of the Colleges in issuing entry to practice licenses.

### **CAPR Clinical Component Re-launch Project and Back Up Plan**

Our Board and members have been following the CAPR updates on the Clinical Component Relaunch Project over the last several weeks. We have reviewed the plan, offered our support and we hope that CAPR's plan will succeed. However, as you can understand, concerns remain. Candidates, Canadians and the profession cannot simply assume that this relaunch project is guaranteed to be a success. If the CAPR Relaunch Project fails, an alternative process is necessary so candidates are not further impeded from being licensed as soon as possible. We feel the need to ask for this because, apart from two provinces, we have not seen evidence that Physiotherapy Regulatory Colleges have considered meaningful alternative solutions in a unified manner, should the CAPR relaunch not succeed. Our members and the candidates for the PCE have noticed that other health care regulatory bodies have successfully met the challenge of these extraordinary times with unified, special measures.

The [Medical Council of Canada](#), in discontinuing delivery of its virtual examination, is an example of a different and more unified approach that was timely, responsive to these extraordinary times and is national in scope. Within days the MCC announced a refund of candidates' fees and committed to working collaboratively with the regulatory authorities across the country to determine a process such that qualified candidates on provisional licenses can be granted full licenses by the MRAs. We are confident that CAPR, its members and College Councils can also find a way to allow the candidates in waiting to pursue licensing in a timelier way.

Canada's accredited physiotherapy programs are robust and produce safe, competent entry level trainees, and there are rigorous credentialing mechanisms in place for internationally trained candidates. The safety of patients is paramount. We believe that risks can be effectively mitigated and managed in the absence of the clinical component. This has been demonstrated by the actions of two physiotherapy regulatory colleges in this country.



Prior to the pandemic the country was experiencing a shortage of physiotherapists and the human resources demand has only since intensified. Across the country, clinics, hospitals, home and community care settings in both urban and rural regions are unable to fill vacancies for physiotherapists. Surgical waitlist backlogs and Canadians recovering from the effects of pandemic restrictions and other health conditions require our essential service. Clinics have reported that they may have to close their doors if they are unable to secure licensed physiotherapists to serve the patient population. The profession is losing trainees – some are electing to seek opportunities in other countries or are pursuing other professional avenues. In the absence of unified action and leadership, we are not enabling our essential profession to practice and deliver care to the Canadians who need it.

The CPA wants to see the Re-launch of the Virtual PCE Clinical Component succeed, and we are available to support that effort in any way we can. In addition, we would like to work together with our regulatory partners to find an expeditious solution to licensure that ensures public safety is not sacrificed, should the relaunch not be successful. We call on our regulatory partners to work together and take the extraordinary measures that are required to respond to the circumstances brought on by the pandemic.

As stated at the outset of this letter, we request assurances that if the CAPR exam does not proceed as planned, that the members of the CAPR Board will take necessary measures to enable candidates to achieve entry to practice licensure across the country, in the same time frame as promised by the current Clinical Component Relaunch Project i.e., by end of 2021. We agree that there needs to be a national approach for the candidates, for the profession and for Canadians. The CPA remains committed to ensuring their voices are heard, and we are here to work with you. We would welcome an opportunity to meet and discuss options.

Sincerely,

Viivi Riis, CPA President

John-Paul Cody-Cox, CPA CEO



CC: The CPA Board of Directors

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