



COLLEGE OF RESPIRATORY THERAPISTS OF ONTARIO

ORDRE DES THÉRAPEUTES RESPIRATOIRES DE L'ONTARIO

August 20, 2008

Response to the Physiotherapy Scope of Practice Review Joint Submission

The College of Respiratory Therapists of Ontario (CRTO) would like to commend the College of Physiotherapists of Ontario (CPO) and the Ontario Physiotherapists Association (OPA) on a thoughtful and well researched submission. We appreciate the opportunity provided by the Health Professions Regulatory Advisory Committee (HPRAC) to attend the round table discussion and provide a response to this submission.

This review is requesting access to a portion of Regulated Health Professions Act (RHPA) controlled act #5 “*administering a substance by injection or inhalation*”. The proposed act would permit Physiotherapists **to administer, by inhalation i) oxygen, or ii) a drug or substance that has been ordered by a person who is authorized to do so.** We would like to make the following statements regarding this request:

- Concerning oxygen administration, the CRTO would be supportive of Physiotherapists having authorization to this portion of the act within defined parameters based on their scope of practice as set out in the *Physiotherapy Act*. We feel that it would be in the best interest of optimal patient care for Physiotherapists to be able to titrate oxygen on the basis of a valid order in order to accommodate their practice.
- Regarding administering a substance, it is our understanding that the purpose of accessing this portion of the act is to permit Physiotherapists to apply inhaled medications such as bronchodilators as required. The CRTO would also be supportive of this aspect of the act being utilized by Physiotherapists for the purpose of medication administration only.
- Practice guidelines produced by the CPO/ OPA will guide their Members in carrying out the activities within this act. The CRTO would like to offer their assistance in the development of such guidelines, particularly with regards to certain aspects of this act that are closely aligned with the Respiratory Therapists’ practice, including oxygen administration, such as pre-oxygenation prior to suctioning of mechanically ventilated patients.

This review also requests a change to the Respiratory Therapy Act to allow

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Physiotherapists the ability to place an order for services by a Respiratory Therapist. The CRTO cannot foresee a circumstance under which it would be appropriate for such an order to occur. Our recommendation is that the requested change to the Respiratory Therapy Act does not proceed.

The CRTO strongly supports interprofessional collaboration that permits all health care professionals to work to and within the fullest extent of their respective scopes of practice. It will be only when we have a complete understanding and respect of each profession's expertise that we will be able to ensure that the optimal skill set is available for the benefit of the patient public of Ontario.

Yours truly,

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