



August 13, 2008

Ms. Barbara Sullivan
Chair
Health Professions Regulatory Advisory Council
55 St. Clair Avenue West
Suite 806, Box 18
Toronto ON M4V 2Y7

Dear Ms. Sullivan,

Re: Physiotherapy Scope of Practice Review

On behalf of the 10,472 members of the Canadian Physiotherapy Association I am writing in support of the June 30, 2008 joint submission to the Health Professions Regulatory Advisory Council by the Ontario Physiotherapy Association and the College of Physiotherapists of Ontario. We are grateful to you and the Government of Ontario for this opportunity to respond.

The CPA provided support to the OPA / CPO partnership during the development of the joint submission. Dr. Dawn Burnett, PT, PhD, CPA Director of Policy & Practice, shared her extensive knowledge of physiotherapy in other provinces and international jurisdictions. Dr. Burnett's participation reflects the importance to our profession across Canada of the proposed changes to our scope of practice.

Two of HPRAC's stated objectives for this process are to enhance interprofessional collaboration and enhance scopes of practice to ensure that all regulated health professionals work to their maximum competence and capability, supporting the ultimate goal of enhancing the delivery of interprofessional, patient-centred care. We believe the OPA / CPO joint submission is an appropriate response to this challenge.

Increasing efficiency in the delivery of quality health care requires innovative solutions. The proposed changes are innovative yet reflect an expanded scope that has been demonstrated in other jurisdictions to be safe, beneficial and cost-effective. Communicating a diagnosis, treating wounds and administering oxygen by inhalation are common practice and already within physiotherapists' scope in most of Canada. Physiotherapists in Ontario currently order x-rays, lab tests, magnetic resonance imaging and assess and treat patients with incontinence (putting an instrument, hand or finger beyond the labia majora or the anal verge) but only under medical delegation. Adding these restricted duties to the scope of practice, while supported by evidence from other provinces as being safe and effective, will move Ontario to the forefront of enhanced physiotherapy practice.



In a recent meeting with the American Physical Therapy Association we highlighted the HPRAC submission as an example of how Canadians are working to translate the desire for enhanced interprofessional collaboration into meaningful, actionable change. Our colleagues immediately recognized the substantial patient value in this proposal and suggested co-hosting an international symposium with the CPA and the World Confederation for Physical Therapy to share this information with physiotherapy around the world.

The OPA / CPO submission represents an important opportunity to respond in a meaningful way to the challenge of enhanced interprofessional collaboration. As recently noted by the Health Council of Canada in their June 2008 report 'Rekindling Reform', enhancements to primary care have generally fallen short due to a failure to invest in long-term sustainable change. This proposal offers just such an investment, removing impediments to efficient care across the entire province of Ontario. We thank you for this opportunity to comment and encourage the HPRAC to support the recommendations in their entirety.

Sincerely,

A handwritten signature in black ink, appearing to read 'Michael Brennan', with a long horizontal flourish extending to the right.

Michael Brennan
Chief Executive Officer