



COLLEGE OF
PHYSIOTHERAPISTS
of ONTARIO

Entry to Practice Review

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Entry to Practice Review
College of Physiotherapists of Ontario, 2010

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1.0 Executive Summary

Under the Regulated Health Professions Act (RHPA), regulatory bodies are required to review their own registration processes, submit reports to Office of the Fairness Commissioner Ontario (OFC) about their registration practices and undergo compliance audits. These activities are intended to ensure fairness, transparency, objectivity and impartiality.

This Entry to Practice Review Report was compiled in response to a request from the OFC and is focused on three areas:

1. An analysis of the necessity and relevance of any requirements for practical training or work experience
2. An analysis of the reasonableness of fees (including fees charged by third party assessment agencies)
3. An analysis of the efficiency and timeliness of decision-making (including decisions related to assessment, registration and appeals).

While this report was initiated in response to a mandatory request from the OFC, the College voluntarily expanded the scope of the review to take advantage of the opportunity to fully examine the requirements in the three identified areas of focus.

Focus 1: Practice Hours

Applicants seeking registration with the College of Physiotherapists of Ontario (the College) are required to demonstrate competence and currency. Applicants are required to successfully complete a two part physiotherapy competency exam (PCE) prior to registration with the College to demonstrate competence. Five years after completion of the PCE and every year after that, individuals are required to maintain 1200 hours of practice within the previous five years to demonstrate currency in practice. Practice hours include worked and professional activity hours, are self-declared (the College does not verify them) and can be claimed from practice anywhere in the world.

Ensuring continuing competence is a complex matter. In a rapidly shifting health care milieu, practitioners who are competent today may not be competent tomorrow. For many regulatory bodies, practice hours have acted as a proxy in the absence of other quality monitoring processes. This has been based on the belief that practitioners have a greater chance of maintaining competency if exposed to some level of practice. Practice hours also indicate that the registrant has some level of currency of knowledge/practice and provide some information about registrants who may be at risk due to inactivity.

Historically, physiotherapy regulators in Canada agreed to common a practice hour requirement of 1200 hours over five years as part of the Mutual Recognition Agreement signed in 2002. The 1200 hours represented the midpoint of the number of practice hours required by the various regulators and required the least amount of legislation change. The selection of the five year window was supported in the literature by two theories: the half-life theory and learning theory. However, some believe that the half-life of knowledge may now be less than five years due to the explosion and availability of information.

Over the past decade most of the physiotherapy regulators in Canada have developed quality management programs that involve a number of strategies for assuring continuing competence.

The research indicates that a combination of assessment strategies and tools are most effective for evaluating continuing competence. In addition, the choice of assessment strategy/tool depends on what is being measured. If evaluation of the application of knowledge is required, then the evaluation should include some practice measure. In this context, a practice hour requirement may still have value along with the other quality assurance tools.

A review of the practices of comparable Canadian and international regulators revealed wide variation. However, if looked at on an annual basis, the practice hour requirements range between 166-240 hours per year. The College requirements when considered on an annual basis (i.e. 240 hours) are within this range.

Research indicates that using a combination of assessment strategies may be the most effective for evaluating continuing competence. If the evaluation of the application of knowledge is required, then a practice hour requirement may have some value when used along with other quality assurance tools. The challenge, as always, is to find a balance between reasonable, feasible and affordable standards that meet the expectations of the public.

Based on the findings, the requirement to demonstrate 1200 hours of practice within the previous 5 years as a measure of currency and a screening tool for ongoing competence remains necessary, relevant and appropriate. There is insufficient evidence to support the need for change.

Focus 2: Fees

There are number of requirements to become a registered physiotherapist in Ontario such as demonstrating language proficiency and substantially equivalent education credentials, completing a two part competence examination, and submitting an application for registration. The Canadian Alliance of Physiotherapy Regulators (The Alliance) conducts the credentialing assessments and examinations on behalf of the College. The Alliance and the College each determine their respective fees annually as part of the budgeting process taking into account various fixed and variable factors according to documented policies.

Information about fees is available on both the Alliance and College websites and is updated regularly.

The fees charged by the Alliance and the College are well within range of comparable Canadian and international regulatory bodies in all areas i.e. assessment of credentials; two part competency exam; application fees and registration fees. In addition, information about fees is readily available, easy to access, transparent and kept up to date by both organizations.

The review demonstrates that the fees to become registered as a physiotherapist in Ontario are reasonable, fair, objective, impartial and transparent.

Focus 3 Timeliness of Decision-Making including Appeals

Timeliness of Decision-Making

There are a number of significant registration decisions involved in registering as a physiotherapist in Ontario including:

1. Review of credentials/qualifications +/- Prior Learning Assessment Recognition (if necessary)
2. Apply, complete and learn the outcome of the written component of the PCE
3. Apply, for the clinical component of the PCE
4. Apply for a Provisional Practice Certificate (optional)
5. Complete and learn the outcome of the clinical component of the PCE
6. Apply for an Independent Practice Certificate

The expected, actual, minimum and maximum times for decision-making for each of these steps were reviewed against internal policies and comparable Canadian and international regulatory bodies.

The expected timelines for decisions made by the Alliance (i.e. steps 1, 2, 3, and 5), are all published in policies in the Candidate Handbooks and are reviewed on an annual basis. The timelines for registration decisions made by the College (i.e. steps 4 and 6) are published on the College website and in the application for registration guide. Additionally, the College uses a “Balanced Scorecard Approach” to monitor timelines, and reports are made to the College Council quarterly. Registration decisions for each organization are made within the documented expected timelines, and information about timeliness is transparently communicated to applicants.

The timeliness of decision-making was also reviewed against comparable regulatory bodies and the Pan-Canadian Framework for the Assessment and Recognition of Foreign Qualifications. Under the Framework, recognition of foreign credentials and experience will be streamlined so that foreign-trained workers who submit an application to be licensed or registered to work in certain fields will be advised within one year whether their qualifications will be recognized. The Alliance meets the intent of this framework completing 98% of credential evaluations within 33 weeks and 85% within 22 weeks.

The time for the College to process an applicant’s application for either a Provisional Practice Certificate or an independent practice certificate is minimal (usually within 10 business days).

The timelines for all steps of the registration process were well within the range of comparable regulatory bodies.

Appeal Mechanisms

Each step of the registration process has an appeal mechanism. Information about appeal mechanisms is available on the Alliance website prior to application for credentialing/examination. Additional details and telephone support is provided to unsuccessful candidates. The College provides detailed written information about appeals with the decision, when it is most useful to the candidate and also offers telephone support.

The appeal processes used by comparable Canadian and international regulators were reviewed against the appeal policies for Ontario physiotherapy applicants. Based on the information reviewed, the appeal mechanisms are fair, objective, impartial, transparent, and in line with “best practices” when compared to similar organizations. Information about timelines and appeal mechanisms is transparent and provided to applicants/candidates in an appropriate and timely manner.

Summary and Recommendations

- The multiple measure approach used by the College¹ to ensure currency and competency continues to be necessary, relevant and appropriate. In particular, the requirement to demonstrate 1200 hours of practice within the previous 5 years as a measure of currency and a screening tool for ongoing competence remains necessary, relevant and appropriate. There is insufficient evidence to alter or eliminate the practice hour requirement.
- The fees charged by the College and its primary third party assessment agency (The Alliance) are documented in and compliant with policy, undergo regular review, are comparable to other regulatory organizations, and are communicated clearly to applicants. As such, the registration fees for physiotherapy applicants are not only reasonable but are also fair, objective, impartial and transparent.
- The decision-making practices and appeals processes of the College and its third party assessment agency (The Alliance) are documented in and compliant with policy, meet defined timelines, are communicated clearly to applicants and meet the intent of the Pan Canadian Framework. As such, the College's registration practices related to decision-making and appeals are fair, objective, impartial and transparent.
- While information on registration requirements, fees, decision-making timelines and appeal processes is readily available at the time it is needed, wanted and useful to applicants, the College will continue to examine ways to enhance access, transparency and clarity in the communication of information to applicants. For example, the College will:
 - update the Registration Process flow chart to include fees and/or develop a fee webpage for the College website
 - update the Registration Process flow chart to include timelines
 - consider making appeal information available on the College website
- The College will continue to monitor the emerging literature and the practice of other regulators in all three areas reviewed (i.e. practice hours, fees and decision-making (including appeals)) to maintain awareness and ensure continuation of College best practices in these areas.
- The College will continue to maintain a collaborative relationship and share information with The Alliance. This will allow mutual awareness of best practices in all areas as well as facilitate access to and clarity of information provided to applicants.

¹ Measures include a declaration of 1200 hours of practice in the previous 5 years (as a screening tool to identify individuals at risk of not maintaining competence); jurisprudence testing initially and at 5 year intervals (to ensure knowledge of the rules) and peer assessment of a random selection of 5% of the registrant base

2.0 Introduction

The Office of the Fairness Commissioner Ontario (OFC) opened in April 2007 with a mandate to assess the registration practices of regulatory bodies in Ontario (health and non-health) to ensure fairness, transparency, objectivity and impartiality. The mandate for health professions is outlined in the Regulated Health Professions Act (RHPA) sections 22.1 – 22.14.

The OFC requires the bodies that regulate professions to review their own registration processes, submit reports to the OFC and undergo compliance audits. These activities are intended to assist the OFC in ensuring that the health regulatory bodies are meeting their RHPA obligations. Work to date has included:

- Conducting a study of Fair Registration Practices
- Requiring regulators to submit Fair Registration Practices Reports
- Requiring regulatory bodies to undergo an external audit of registration practices
- Conducting a study about the experiences of applicants

In June 2010, the OFC notified regulatory bodies of the requirement to submit an Entry to Practice Review Report March 1, 2011 focused on three areas:

1. practical training or work experience
2. fees
3. decision-making

In response to the OFC's request to conduct an Entry to Practice Review, the College of Physiotherapists of Ontario (the College) developed a list of questions for the three focus areas and contracted Parker-Taillon Consulting Inc. to gather relevant information to assist in the preparation of the submission. The following report is the result of the data collected by Parker-Taillon Consulting Inc, analyzed by the College and the consultant, and approved by the College's Registration Committee. The report will also be shared with College Council at its March 11, 2011 quarterly meeting.

3.0 Objectives and Scope

While this report was initiated in response to a mandatory request from the OFC, the College voluntarily expanded the scope of the review to take advantage of the opportunity to fully examine the requirements in the three identified areas of focus.

Review Questions

The review questions focused on the following three areas as indicated by the OFC:

1. An analysis of the necessity and relevance of the requirements for practical training or work experience
2. An analysis of the reasonableness of fees (including the fees charged by the College's third party assessment agency, The Canadian Alliance of Physiotherapy Regulators – The Alliance)
3. An analysis of the efficiency and timeliness of decision-making (including decisions related to assessment, examination, registration and appeals).

Each chapter of this report is separated into three sections corresponding to each of the three review questions i.e. Focus 1 (practice training/work experience), Focus 2 (fees) and Focus 3 (decision-making).

3.1 Focus 1 (practice training/work experience):

Objective

To examine the necessity and relevance of the practice hour requirement for applicants and Independent Practice Certificate holders in Ontario.

Background

Applicants seeking registration with the College are required to demonstrate competence in practice. Individuals who are new to practice (i.e. new graduates) or new to practice in Canada (i.e. internationally educated physiotherapists, IEPTs) must complete the Physiotherapy Competency Exam (PCE) as a way of demonstrating competence. Individuals who were registered in a jurisdiction in Canada on December 31, 1993 when the PCE became mandatory are exempt from the PCE requirement but must demonstrate 1200 hours of practice within the previous five years to demonstrate currency when seeking registration. Registrants who do not meet the practice hour requirement may be eligible to complete the College Review Program to demonstrate competence or may opt to complete the PCE.

This practice hour requirement is also necessary in order to maintain registration. Five years after an Independent Practice Certificate is first issued and every year after that, physiotherapists are required to demonstrate that they maintain currency in practice by meeting a practice hour requirement. The practice hour requirement is 1200 hours of practice within the previous five calendar years. Practice hours are self-declared (the College does not verify them) and can be claimed for practice activities anywhere in the world.

Practice Hours include worked hours that are paid and professional activity hours:

- Worked Hours include hours of practice in clinical setting(s), consultation, administration, research, academia, and sales. It is not necessary to have the job title of Physiotherapist/Physical Therapist. You cannot claim hours related to vacation, sick leave, statutory holidays, leaves of absence and special leaves.
- Professional Activity Hours include hours of volunteer activity which require the use of physiotherapy theory and knowledge, continuing education hours and/or participation in the physiotherapy professional/regulatory organizations (OPA, CPA, College, Alliance). No more than 30 professional activity hours can be counted toward total practice hours each year.

The College undertook an in-depth voluntary review of the practice hour requirement.

Specific Questions:

1. The College's mandate is to assure the competence of individuals registered to practice as physiotherapists,
 - a. How does the practice hour requirement contribute to this assurance?
 - b. Why 1200 hours?
 - c. Why 5 years?
2. Physiotherapists once registered are required to participate in Quality Assurance (QA) Program and a Jurisprudence Education Module. The QA program consists of 2 components: a self assessment which is completed annually by all physiotherapists and a peer assessment in which 5% of physiotherapists are randomly selected to participate each year. Successful completion of the Jurisprudence Education Module is required by all physiotherapists within the first year of registration and at five year intervals. Given these requirements,
 - a. Does a practice hour requirement continue to add value for measuring competency and currency?
3. How do other Canadian and international regulators with a similar regulatory scheme measure currency and competency of their registrants?
4. What are the regulatory implications of removing the practice hour requirement?
5. What are applicants saying?

3.2 Focus 2 (fees)

Objective

To examine the fees charged to individuals seeking to become registered to practice as a physiotherapist in Ontario; and examine the reasonableness of fees charged for credentialing, examination and registration.

Background

There are number of requirements to become a registered physiotherapist in Ontario such as demonstrating language proficiency and substantially equivalent education credentials, completing a two part competence examination, and submitting an application for registration. There are also fees associated with each process. The College compiles a list of all fees and publishes the list in a Career Map for Internationally Trained Physiotherapists. The Career Map is available on the government of Ontario (ontarioimmigration.ca) and College websites. The College regularly reviews and updates this list.

While the College maintains an awareness of the fees related to meeting various registration requirements, not all fees are within the control or influence of the College. For example, language assessments are generic for most professions and are conducted by a variety of external corporate entities over which the College has no influence; therefore a summary review of fees related to language assessments was conducted.

Credentialing evaluations and competency examinations are completed by a third party, The Alliance, on behalf of all physiotherapy regulators in Canada. The Alliance is a not-for-profit organization and charges fees to recover the costs associated with credentialing and examination. However, a mandatory review of the policies and procedures used by The Alliance to determine, review and exempt fees was conducted.

The College too is a not for profit organization. The College annually reviews registration fees as part of the budgeting process and voluntarily completed an in-depth analysis of registration fees in 2010 to assist College Council in determining the fees for 2011. A summary of that analysis is provided.

Specific Questions

1. What are the fees?
 - a. How are the fees determined? Are there fixed and variable factors affecting the fee?
 - b. Are the fees anchored in a documented process or policy?
 - c. How often are the fees reviewed?
 - d. Can there be any exceptions made to the fees charged or how they are paid? Who makes those decisions and how?
2. How do applicants learn about the fees?
 - a. Is the fee schedule clear and easy to find on the website or communication materials?
 - b. How does the organization ensure that all fee related communication materials are updated uniformly?
3. How does the fee schedule compare to Canadian and International bodies with similar volume of applications and staff?
4. What are applicants saying?

3.3 Focus 3 (decision-making)

Objective

To examine the efficiency, timeliness and communication of decisions, including decisions related to credential assessment, examination, registration and appeals.

Background

There are number of requirements to become registered to practice as a physiotherapist in Ontario such as language testing, credential evaluation, and competency examination. As such, there are decisions related to each requirement; some of these decisions are made by the College and others by a third party assessment agency, The Alliance. The Alliance conducts credential evaluations and competency examinations on behalf of the College and all physiotherapy regulatory bodies in Canada.

In 2010 federal, provincial and territorial senior officials responsible for labour market and immigration approved a one year commitment to timely service whereby individuals will know whether their qualifications will be recognized or be informed of additional requirements necessary for registration or be directed toward related occupations commensurate with their skills and experience (i.e. the Pan Canadian Framework).

While the College has been involved in numerous discussions and evaluations related to implementing the Pan Canadian Framework and is confident that its registration practices meet the timeframe defined in the Framework, there is an opportunity to formally analyze and clearly document the timeframe for all decisions from the time an individual initiates the registration process at The Alliance to the time they receive a certificate to practice in Ontario.

This in-depth mandatory review of practices was conducted.

Specific Questions

1. What are the significant decisions impacting an applicant seeking registration with the College?
2. How long does it take an applicant to receive each of these decisions?
 - a. What is the consistency with policy for the range of average/maximum-minimum times?
 - b. What are the factors affecting the decision making process?
 - c. Are the decisions anchored in a documented process or policy? How often is the policy reviewed?
 - d. What is the impact of Pan Canadian framework? Do the College and its third party assessors meet the intent of this framework?
3. How do the registration processes/timelines compare to other Canadian and international regulators with similar volume of applicants?
4. How can an applicant appeal the above decisions?
 - a. How does the applicant know how to appeal? When is appeal information provided?
 - b. Can the transparency and availability of appeal information be streamlined?
5. How do the appeal processes/timelines compare to other Canadian and international regulators with similar volume of applicants?
6. What are applicants saying?

4.0 Methodology

As mentioned previously, the College engaged the assistance of Parker-Tailon Consulting Inc. to gather relevant information to assist in the preparation of the submission. The data gathered was then analyzed by the consultant and College staff before being presented to the Registration Committee for discussion/approval. This report will also be shared with College Council at its March 11, 2011 quarterly meeting.

The Registration Committee was apprised of the requirement to conduct an Entry to Practice Review, the content of the review and the intent to engage a consultant to assist with the review in August 2010. The contract with the consultant was signed in October 2010 and the review conducted between November 2010 and February 2011.

The Associate Registrar, Practice and Acting Director of Entry to Practice acted as the key contact for the consultant. The consultant reports were shared with College staff (the Entry to Practice Team and the Registrar) in order to analyze and make recommendations to the Registration Committee. The Registration Committee reviewed and discussed the consultant reports, summaries and proposed recommendations. The Committee approved the final list of recommendations at their February 17th meeting.

4.1 Focus 1 (practical training or work experience)

The approach used to gather information for Focus 1 involved three key activities:

A. Literature/Web Searching and Review

Background information on history, current College practices, policies and requirements was reviewed. An on-line literature search was also conducted using Google Scholar and Pub Med. Key search words included: continuing competency; retention of skills; practice hours; active practice, licensure renewal; professional obsolescence; and continuing education. In addition, information from the websites of ten Canadian and international regulators with similar regulatory schemes as identified by College staff (see Appendix A) was reviewed to assist in answering the specific questions that were identified. Some of the regulators were contacted by email to confirm/augment information obtained from their websites. Telephone follow ups were used as necessary to ensure information was obtained from all identified regulators.

B. Key Informant Interviews

Telephone interviews were also conducted with five key informants to gain additional information not available from the literature/web-searching (see Appendix B for the list of key informants).

C. Analysis and Development of the Draft Report

The consultant analyzed the findings, developed a draft report and submitted it to the College for feedback. Additional information/clarification was requested and a final report was developed.

4.2 Focus 2 (fees)

The approach used to gather information for Focus 2 also involved three key activities:

A. Literature/Web Searching and Review

The consultant received from the College and reviewed relevant background information related to the topic. Additional information from the College, The Alliance and other Canadian and international regulators with similar regulatory schemes (see Appendix A) was obtained from their respective websites and reviewed to assist in answering the questions identified by the College.

B. Key Informant Interviews

Telephone interviews were conducted to gain additional information from two representatives of the Canadian Alliance of Physiotherapy Regulators: Alison Cooper, Director of Examinations and Tabasom Eftekari, Director of Credentialing and Corporate Services.

C. Analysis and Development of the Draft Report

The Consultant analyzed the findings and developed the Focus 3 report and submitted to the College's Key Contact. Additional information/clarification was requested and a final report developed.

4.3 Focus 3 (decision-making)

The approach used to gather information for Focus 3 involved the same three key activities as Focus 1 and Focus 2:

A. Literature/Web Searching and Review

The consultant received and reviewed relevant background information, obtained and reviewed additional information from the websites of the identified organizations and followed up with telephone calls to answer any remaining questions.

B. Key Informant Interviews

Telephone interviews were conducted with key informants from The Alliance: Alison Cooper, Director of Examinations and Tabasom Eftekari, Director of Credentialing and Corporate Services.

C. Analysis and Development of the Draft Report

The Consultant analyzed the findings and submitted a report to the College's Key Contact. Additional information/clarification was requested and a final report developed.

5.0 Analysis and Findings

Findings will be discussed separately for each of the three areas of focus i.e. Focus 1 (practice training/work experience), Focus 2 (fees) and Focus 3 (decision-making).

5.1 Focus 1 (practical training or work experience)

The findings for Focus 1 are presented under each of the questions that were developed and outlined in section 3.1. Background information can also be found in section 3.1

5.1.1 The College's mandate is to assure the initial and ongoing competence of an individual registered to practice as a physiotherapist, how does the practice hour contribute to this assurance?

Protecting public health, welfare and safety is recognized as the primary obligation for professional regulation. Inherent in that obligation is meeting the public's expectation that licensed or regulated practitioners have met the educational and professional qualifications for practice and, that they continue to practice competently (Canadian Alliance of Physiotherapy Regulators, 2000).

For many regulatory bodies, practice hours have acted as a proxy in the absence of other quality monitoring processes. Some professions have taken the position that by working a minimum number of hours, practitioners have the opportunity to retain or acquire knowledge, skills and abilities required to maintain competence. It seems logical to draw the conclusion that practitioners if exposed to some level of practice or practice related activity have a greater chance of maintaining a level of competence (Canadian Alliance of Physiotherapy Regulators, 2000).

Practice hours also indicate some level of the currency of the registrant. Currency is not a measure of competency, but to be competent you need to be current. A professional needs to have access to current practice knowledge, cognitive processes and psychomotor skill development and integration to be competent. In other words, currency is necessary, but not sufficient to be competent.

Currency requirements also assist regulatory colleges in meeting their mandate of ensuring essential competence by providing some information regarding registrants who may be at risk. The importance of maintaining "active practice" is supported by a number of studies that have found that physicians who perform a lower volume of procedures or who have less experience with specific conditions or diseases have higher rates of complications compared with their peers (Freed, 2009). Other research has shown that the volume and frequency of care provided for specific conditions in hospitals and emergency departments also have an important impact on the accuracy of diagnosis, frequency of complications, and patient survival (Freed, 2009). These findings suggest that even once-competent health professionals may be at risk of losing skills during a period of inactivity. As a result, Freed (2009) notes that the issue of clinical inactivity is of growing importance to medical state licensing authorities.

5.1.2 Why 1200 hours? Why 5 years?

This question is answered by looking firstly at the historical context for the decision of 1200 hours over five years made by physiotherapy regulators approximately a decade ago. A brief review of the literature related to the practice hour requirement is then provided.

Historical Context

On October 26, 2002, physiotherapy regulators from across Canada accepted the Physiotherapy Mutual Recognition Agreement (MRA). The MRA was created to comply with the labour mobility provisions of the Agreement on Internal Trade (AIT). The MRA asked provincial/territorial regulators to recognize the competency of licensed/registered physiotherapists practicing in other regions of Canada, based on their education, examination and practice-hour experience. Individual provincial and territorial regulators worked collaboratively to make the necessary legislative and policy changes to accommodate this recognition (Canadian Alliance of Physiotherapy Regulators, 2004).

When the MRA discussions began in 2000, the majority of jurisdictions (n=7) had existing practice hour requirements ranging from 390 hours in three years in Manitoba to 1550 hours in five years in Alberta and Ontario (Canadian Alliance of Physiotherapy Regulators, 2000). The industry standard appeared to be a five year review period. To assist the regulators with the decision-making related to continuing competence two papers were commissioned (Canadian Alliance of Physiotherapy Regulators, 2000; and College of Physical Therapists of British Columbia, 2000).

The findings of the College of Physical Therapists of BC (2000) study suggest that practitioners need to take purposeful action to sustain occupational competence. The evidence suggested that full occupational competence is retained through continued reflective practice and keeping up to date. It also raised the question as to how much practice, and with what frequency, is necessary to sustain full occupational competence. In answer to this question the following was suggested:

“The answer (in terms of practice hours) may vary between areas of practice and especially between areas of high and low acuity. A limited level of practice, for example, half a day a week for at least 40 weeks of the year, might be sufficient to sustain full competence for a practitioner who has at least 10 years full-time prior experience in many areas. This is true as long as she or he also takes steps to sustain learning and to keep up-to-date. The period of time individuals could go without practicing without seriously compromising competence would reflect their depth of learning. Similarly, it seems a reasonable assumption that the amounts of ongoing experience necessary to sustain competence will also inversely reflect prior experience, both in terms of years and diversity. On the one hand, three hours a week after ten years experience may not be sufficient. Moreover, the figures were generated as an illustration only, however, to illustrate the type of relationship that might exist. On the other hand, given that learning tends to be exponential and decay inversely exponential, it might be more relevant to adopt a single minimum level of intensity after five years experience” (College of Physical Therapists of British Columbia, 2000).

Considering this and other reports, and in reviewing the current number of practice hours required, the regulatory group (except Quebec) agreed that 1200 hours over five years represented the midpoint required by Canadian regulators and would require the least amount of legislative change (Canadian Alliance of Physiotherapy Regulators, 2000).

Literature Findings:

The review of the literature revealed two theories that supported the five-year window: the half-life concept and learning theory.

Dubin (1972) proposed that the half-life concept (a term drawn from nuclear physics) as a useful measure for estimating the extent of obsolescence in various professions. He described the half-life of a professional's competence as the "time after completion of professional training when, because of new developments, practicing professionals have become roughly half as competent as they were upon graduation to meet the demands of their profession". He linked obsolescence with new developments and new knowledge. Dubin estimated the half-life of professional knowledge at the time to be five years for medical and engineering graduates and 10-12 years for psychologists, if no new knowledge was assimilated. Some now believe that the half-life of knowledge is shrinking. They note that half of what is known today was not known 10 years ago. In addition, the amount of knowledge in the world has doubled in the past 10 years and is doubling every 18 months according to the American Society of Training and Documentation (Gonzalez, 2004).

Dubin's half-life theory spearheaded a flurry of activity promoting continuing education as a means to prevent professional obsolescence. As a result, according to McLaughlan & Comeau (2003), professional organizations across Canada assigned seemingly arbitrary levels of continuing education requirements for their membership to maintain their competence. But as Grant (1994) noted, "Underlying the half-life estimates is the assumption that a practitioner that does not keep up with new knowledge, skills and research findings becomes obsolete at the same rate as the knowledge increases. However, not all knowledge is of equal value to a practitioner".

Learning theory indicates that without rehearsal or practice, knowledge fades (Philipsen, Lamm, & Reier, 2007). The literature supports this and indicates that the progressive loss of unused knowledge and skills has been well demonstrated (College of Physical Therapists of British Columbia, 2000). The mean estimate of the period of non-practice before competence may be seriously affected was estimated at less than five years for those with five years or less prior experience (College of Physical Therapists of BC, 2000). The extent to which a physical therapist's skills and knowledge will decay during a period in which they are not being used will be influenced by a variety of factors including the following (College of Physical Therapists of British Columbia, 2000):

- Learning activities that foster deep learning
- Extensive application in varied context
- The degree to which the practitioner reflects on the application of the skills and knowledge and benefits from evaluation and feedback
- The extent to which activities undertaken during the period of non-practice relate to or reinforce the skills required in the practice of physical therapy.

5.1.3 Given the requirements to participate in a Quality Assurance Program and a Jurisprudence Education Module (as previously described in section 3.1), does a practice hour requirement add value for measuring competency and currency?

Research on the effectiveness of different strategies for assuring continuing competence remains scanty and definitive answers as to the reliability, validity, feasibility, or cost effectiveness of alternative mechanisms being implemented are not available (Philipsen, Lamm, & Reier, 2007). Current practice in continuing competence assessment demonstrates that there is no single alternative that stands out as the best choice. Rather, a combination of assessment strategies and tools may be most effective (Canadian Alliance of Physiotherapy Regulators,

2000; College of Physical Therapists of British Columbia, 2000; Philipsen, Lamm, & Reier, 2007).

According to Lundgren & Houseman (2002), the choice of appropriate mechanisms for ensuring continuing competence depends on the accepted definition of competence. In theory, if capacity is the core of the definition, basic knowledge testing may address the issue. If the ability to apply skills is included in the definition of competence, however, testing methods must allow for demonstration of that ability. Shimberg (1996) questioned the notion that a practitioner's cognitive knowledge is a trustworthy indicator of his or her professional competence and suggested use of evaluation methodologies that include practical assessments and tests of abstract information.

Based on this thinking, some believe that knowledge testing strategies alone are not sufficient to measure the individual's competence in terms of the application of skills. Similarly, jurisprudence modules are designed to ensure that physiotherapists understand their legal responsibilities and how these affect day-to-day practice (College of Physiotherapists of Ontario, 2010). As a result, unless there is some other practice or performance measure, a practice hour requirement may continue to have some value. In cases where there is some other type of practice measure, the practice requirement may become unnecessary. Regehr and Mylopoulos (2008) support the importance of practice for professional learning. They state that the current model of formal continuing education delivery is largely unsupported by the literature and yet most practitioners maintain competence despite the apparent flaws in this model. They propose that professional learning not only arises from practice, but actually occurs in practice and is informed by practice.

5.1.4 How do other Canadian and international regulators with a similar regulatory scheme measure currency and competency?

In the course of this inquiry, competence requirements were studied for four groups (see Appendix A for a list of key informant organizations):

1. regulators in Canada with similar regulatory schemes
2. physical therapists in the United States
3. physiotherapists in Great Britain
4. physiotherapists in Australia

Findings are summarized below for each group.

Regulators in Canada with similar regulatory schemes

The continuing competence/quality assurance programs of ten Canadian regulators with regulatory schemes similar to the College were reviewed (see Appendix C). The following was observed:

- Four of nine (44%) have a practice hour requirement - 500 hours within three years (CMTO), 750 hours within three years or 1550 within five years (COTO), and 1200 hours within 5 years (n=2, CPTBC, CPTA). One of the regulators indicated that they have submitted a request to government to change their requirement from 750 hours within three years to 600 hours within three years.²

² Personal communication with Elinor Larney, Deputy Registrar, College of Occupational Therapists of Ontario, December 2010

- Nine of the regulators (90%) have some type of continuing professional development (CPD) requirement involving use of learning needs assessment, learning goals/plan and professional development log/portfolio. Four of these had a specific number of hours of continuing professional development requirement (CMLTO – 30hrs, CMRTO - 25hrs, CPBC – 15hrs, HCPUK – 15 CEUs)
- Three (30%) require an annual declaration related to Quality Assurance (CMLTO, CMRTO, RCDSO)
- Five (50% - all in Ontario) have some type of peer assessment including: on-site assessments (n=3), portfolio audit (n=1), and feedback survey (n=1)
- Seven (70%) have, or are developing, some type of assessment component, including: Jurisprudence focused module/quiz (n=4), Knowledge assessment examination (n=3)

Physical Therapy in the United States

According to the most recent figures from the Federation of State Boards of Physical Therapy (FSBPT), only five (9.6%) of the states (Alaska, Minnesota, New Hampshire, Virginia and Washington) require evidence of continuing active practice hours for licensure renewal. The range of practice hour requirements are: 60 (AK), 320 (MN), 100 (NH), 160 (VA) and 200 (WA), over two years. The number of states requiring continuing competency education units for re-licensure is 31 (59%). Other renewal requirements include: specific courses (e.g., HIV, ethics) (n=3); criminal background checks (n=1); jurisprudence exam (n=9); and proof of malpractice insurance (n=1) (Federation of State Boards of Physical Therapy, 2010).

Physiotherapy in the United Kingdom

Physiotherapy in the United Kingdom is regulated by the Health Professions Council (HPC) which is responsible for the regulation of 15 health professions. The HPC does not have a specific practice hour requirement. However, registrants must renew their registration every two years; this involves signing a declaration that they continue to practise and meet the HPC's standards, including undertaking CPD activities. "Practising" includes activities that draw on the registrants' professional skills and knowledge in the course of their work. A "returner to practice" that has not practised in the two years since the last renewal and therefore cannot sign the declaration, must complete an updating period before they can renew their registration. The updating requirements vary depending on the length of time out of practice. For example: zero to two years there are no updating requirements; two to five years requires 30 days of updating; and 5 years or over requires 60 days of updating. The updating period can involve a combination of supervised practice, formal study and private study (Health Professions Council, 2010).

In addition, the HPC has had a mandatory CPD program in place since 2006. This program defines CPD as "a range of learning activities through which health professionals maintain and develop throughout their career to practice safely, effectively and legally within their evolving scope of practice". The program is outcomes-based and does not require a specific number of hours. The program requires a record of CPD activities and encourages registrants to be explicit about the benefit of the CPD activity for themselves and service users. A random sample of registrants' CPD records is audited every year. This strategy has allowed HPC to manage costs effectively (Health Professions Council, 2010).

Physiotherapy in Australia

As of July 1 2010, the Council of Australian Governments (COAG) established a single National Registration and Accreditation Scheme for 10 health professions and a new organization, the Australian Health Practitioner Regulation Agency (AHPRA). Under the umbrella of AHPRA there is a National Board for each profession, including physiotherapy. The Physiotherapy Board of Australia has established State and Territory Boards to support the work of the National Board. The National Board sets policy and professional standards, and the State and Territory Boards continue to make individual notification and registration decisions affecting individual physiotherapists (Australian Health Practitioner Regulation Agency, 2010).

The current requirements for renewal of registration include (Physiotherapy Board of Australia, 2010):

- Recency of practice: Registrants must confirm that they have practiced within the five years before the first day of the renewal period. If a registrant has not practiced for more than five years, they are required to demonstrate competence to practice
- Continuing professional development: Must maintain a portfolio that documents CPD; at least 20 hours of CPD per year; annual audit
- Criminal history check
- Professional indemnity insurance

5.1.5 What are the regulatory implications of removing the practice hour requirement?

The following were identified as potential implications of removing the practice hour requirement:

- Competence is complex; ensuring essential competence of health practitioners involves implementing the right balance of measures that are reasonable, appropriate and meet the expectations of the public.
- Peer assessment is the gold standard for examining performance in practice but can be cost prohibitive.
- The health system is not specifically designed to pick up or flag professionals that lack competence. Patients may not know what to look for. The practice hour requirement is a simple, easy to collect piece of information that serves as a trigger to identify individuals who may need a closer look to ensure competence
- Health regulators are required to collect from each registrant the number of hours worked to assist with workforce planning
- A variation in standards can have impact in other jurisdictions, nationally and internationally

5.1.6 What are applicants saying?

It is difficult to estimate how many individuals the practice hour requirement has impacted. However, we do know that the registrant base of 7000 physiotherapists in Ontario is approximately 80% female, and a large proportion choose to have families and take maternity leaves of varying duration. In the past eight years, 20 physiotherapists did not meet the practice

hour requirement and completed the College Review Program in order to maintain registration with the College. The College Review Program consists of an onsite assessment of practice conducted by a trained peer and is similar to the practice assessment conducted as part of the College's QA program. Every individual who participates in a practice assessment is given the opportunity to provide feedback on the process. Five of the 20 chose to complete the feedback survey. Feedback indicates satisfaction with the process and confirms its value as a learning experience however it must be noted that the sample size is very small (n=5). A summary of feedback is presented in Appendix D.

Focus 1 Summary

Ensuring continuing competence is a complex matter. In a rapidly shifting health care milieu, practitioners who are competent today may not be competent tomorrow, not only because of erosion of skills, but because new skills are required to meet client needs. For many regulatory bodies, practice hours have acted as a proxy in the absence of other quality monitoring processes. This has been based on the belief that practitioners have a greater chance of maintaining competence if exposed to some level of practice. Practice hours also indicate that the registrant has some level of currency of knowledge/practice and provide some information about registrants who may be at risk due to inactivity.

Historically, physiotherapy regulators in Canada agreed to a common practice hour requirement of 1200 hours over five years as part of the Mutual Recognition Agreement signed in 2002. At the time it was felt that this requirement represented the midpoint required by the regulators and required the least amount of legislation change. The selection of the window of five years is supported in the literature by two theories: the half-life theory and learning theory. However, some believe that the half-life of knowledge is now less than five years due to the explosion and availability of information.

Over the past decade most of the physiotherapy regulators in Canada have developed quality management programs that involve a number of strategies for assuring continuing competence. The research indicates that there is no single alternative that stands out as the best choice for assessing ongoing competence. Rather a combination of assessment strategies and tools may be most effective for evaluating continuing competence. In addition, the choice of assessment strategy/tool depends on what is being measured. If evaluation of the application of knowledge is required, then the evaluation should include some practice measure. In this context, a practice hour requirement may still have value along with the other quality assurance tools.

Only a few of the Canadian and international regulators examined as part of this review have a specific practice hour requirement and the number of hours and years varies. In most cases, there does not appear to be a clear rationale for why the number of hours or years was chosen. However, if looked at on an annual basis, the range in practice hour requirements within the Canadian regulators examined averages out to be between 166-240 hours per year. The number of years utilized in practice hour requirements ranges from two to five. Many of the regulators have quality assurance programs with an emphasis on reflective practice and continuing professional development. Some regulators have registrants sign a quality assurance declaration that includes a statement related to active practice. Others address the practice hour issue when individuals apply for re-entry after an absence from the profession. A few are moving towards some type of knowledge examination that is taken periodically by the registrants (e.g., every 6-10 years). In addition, a few have in place, or are moving toward, some type of peer audit/review of practice. The challenge, as always, is to find a balance between reasonable, feasible and affordable standards that meet the expectations of the public.

Based on the findings, the multiple measure approach used by the College³ to ensure currency and competency continues to be necessary, relevant and appropriate. In particular, the requirement to demonstrate 1200 hours of practice within the previous 5 years as a measure of currency and a screening tool for ongoing competence remains necessary, relevant and appropriate.

5.2 Focus 2 (fees)

The findings for focus 2 are presented under each of the questions that were developed and outlined in section 3.2. Background information can also be found in section 3.2

5.2.1 What are the fees for each of the steps to register as a physiotherapist in Ontario?

There are fees associated with each of the requirements to become a registered physiotherapist in Ontario such as demonstrating language proficiency and substantially equivalent education credentials, completing a two part competency examination and submitting an application for registration. The steps to become registered and the fees for each step are outlined in Table 1 below. Steps 1-5 apply to IEPTs. Graduates of an accredited Canadian physiotherapy education program are exempt from step one only.

Table 1: Registration Process and Associated Fees for Ontario Physiotherapy Applicants⁴

Step	Organization	Fees
1a. Review of Credentials and Qualifications	Alliance	\$780
1b Language Assessment (if physiotherapy education was not provided in English or French)	Various external parties	\$90-\$275
1c. Completion of PLAR requirements (if necessary)	Alliance and external parties	Admin fee \$425. Course/module fees \$250-\$2000
2. PCE Part One: Written Component	Alliance	Exam fee \$775.
3. PCE Part Two: Clinical Component	Alliance	Exam fee \$1200.
4. Application for Provisional Practice Certificate (Optional)	College	Application fee \$100 (one time only) Certificate fee \$70
5. Application for an Independent Practice Certificate	College	Application fee \$100 (if not paid in step 4) Certificate fee \$600

³ Measures include a declaration of 1200 hours of practice in the previous 5 years (as a screening tool to identify individuals at risk of not maintaining competence); jurisprudence testing initially and at 5 year intervals (to ensure knowledge of the rules) and peer assessment of a random selection of 5% of the registrant base

⁴ All applicants complete steps 2-5; only IEPTs are required to undergo language assessment and credential evaluation (+/- PLAR).

5.2.2 How are the fees determined? Are there fixed and variable factors affecting the fees?

Alliance

The Alliance determines its fees annually as part of the budgeting process. There are both fixed and variable factors affecting the fees. Fixed factors are those within the control of the responsible organization and variable factors are those that are outside of the control of the organization. Fixed factors affecting the fees include: Operating costs (rent, salaries and office supplies); third party contractors; direct costs associated with administering the exam (e.g., exam sites and personnel, exam consultants and special needs costs); committee costs for development of exams and scoring decisions; and costs for research and quality assurance activities (e.g., research projects like the Analysis of Practice and quality assurance reporting (Canadian Alliance of Physiotherapy Regulators, 2010c). Variable factors affecting fees include the number of applicants for credentialing and candidates for any given examination.

College

The College too reviews and determines fees annually at the time of budget setting. The registration fees set by the College are intended to support the entire mandate of the organization and are based on the various regulatory programs and initiatives directed by Council to meet its statutory mandate. Further all policies are regularly reviewed within a set review cycle. All Programs and initiatives are also systematically evaluated to assure their necessity and effectiveness.

The cost of doing business with the objects as set by the RHPA is not inconsequential. The right balance between fees and registrant burden is a constant conversation as Council grapples with fulfilling its statutory responsibilities. Registration fees underwent significant scrutiny in 2010. This included a review of the following: the fees set by other like regulators, program administration and ongoing development costs, revenue and expense data for the previous ten years, inflationary trends and the costs associated with strategic initiatives determined by Council as being key to public protection. The aim is always a fee that supports the business of the regulator, protects its assets, and is reasonably defensible to both the Minister of Health and Long Term Care and individual physiotherapists.

5.2.3 Are the fees anchored in documented processes or policies?

The fees for the steps that each organization performs are anchored in the budgeting processes and organizational policies. Both The Alliance and the College are not for profit organizations and the fees reflect recovery of costs.

5.2.4 How often are the fees reviewed?

The Alliance Board of Directors and the College Council each set their fees annually as part of the budgeting process. Fees are reviewed each spring for the following budget year. This allows time for data gathering/comparison, approval of any proposed changes and inclusion in the applicant/candidate information materials for the following year.

5.2.5 Can there be any exceptions made to the fees charged or how they are paid? If so, who makes those decisions and how?

In terms of the review of credentials and qualifications: There are no exceptions to fees charged. Refunds are provided only when a candidate who has started the process while still in their home country notifies the Alliance that they are unable to leave their country for immigration reasons. In these cases if the credentialing process has not yet started (because documents are not all received in the office) an administrative fee of \$100 is charged and the remainder is refunded.

For the examination, the fees are applied consistently to all candidates. Exam fees for each of part one (written) and part two (clinical) can be paid in two equal installments. The only time an exception to exam fees can be made is if, as a result of an Administrative Reconsideration (AR), it is determined that candidate performance was adversely affected by something that was within the Alliance's control. In every AR case, the AR investigator will consider and make a decision as to whether to recommend that fees be waived fees i.e. candidates do not have to ask.

Registration fees are laid out in the College's by-laws. The College has a policy that allows fee modifications on compassionate grounds. The registrant is asked to document the circumstances in writing for review by the Registrar. Examples that have been approved in the past include the following:

- The registrant or a close family member has a serious illness that prevents them from working the whole year. A pro-rated fee by months worked has been applied in these situations.
- The registrant was unable to pay their annual registration fee on time. Late fees have been waived when there is an illness or death in the family or other significant event that impacted the individual's ability to pay on time.

5.2.6 How do applicants learn about the fees? Is the fee schedule clear and easy to find on the website or communication materials?

Fee information for both the Alliance and the College is clear and easy to find. The following illustrates examples of where this information is located:

- Alliance website/documents: Credentialing Handbook (Section on "What Documents Do You Need to Submit"); Examination Handbook (Fees section); Physiotherapy Competency Examination FAQ's (Section on "How do you Set Exam Fees"); Educational Credentials and Qualifications Assessment for Physiotherapists Educated Outside of Canada FAQ's (Section on General Information – Fees and Assistance)
- College website/documents: Career Map for Internationally Trained Physiotherapists (Fees section); Independent Practice Application Form (Fees section)

5.2.7 How do the organizations ensure that all fee-related communication materials for applicants are updated uniformly?

The communication materials are checked when the Alliance Credentialing and Examination Candidates Handbooks are updated annually. In order to ensure consistency of information related to fees, the Alliance staff advises provincial regulatory bodies whenever new information goes up on the website so they can review it and make any necessary changes to their own websites. The Alliance also encourages the provincial regulatory bodies to link to the Alliance

materials whenever possible. In addition, it should be noted that the Provincial Regulatory Bodies are on the Alliance Board of Directors and thus have a vote in changing the fees so are aware of changes.

All College documents and policies are reviewed regularly within a predetermined review schedule.

5.2.8 How does the fee schedule for the steps involved in registration as a physiotherapist in Ontario compare to Canadian and International bodies with a similar volume of applications and staff?

Comparator Canadian and international regulators were identified (Appendix A). The fees for the registration process for these organizations are provided in Appendix E. The following summarizes the fee comparisons for physiotherapy applicants in Ontario.

- *Review of credentials and qualifications:* (Alliance \$780)
 - For the comparator organizations where this information was available (n=10) the fees ranged from \$395 (COTO and CMRTO) - \$6600 (RCDSO).
 - Four organizations had fees of over \$1000 (RCDSO, CMTO, CPBC and CPA) and all of these required some form of evaluation of skills in their credential review (prior to examination).
 - The remaining six organizations ranged from \$395 (COTO and CMLTO) - \$990 (APC).
 - The fee charged by the Alliance is \$780 and is well within the range for organizations with similar credentialing processes.
- *Examination:* (Alliance total fee \$1975 = \$775 written + \$1200 clinical)
 - For the comparator organizations where this information was available (n=10), the fees ranged from \$440 (COTO and FSBPT) - \$4840 (APC).
 - Four of the organizations had a written examination only and the range of fees for this group was from \$440 (FSBPT) – \$800 (CMRTO).
 - Four of the organizations had a written examination and some type of clinical assessment (e.g., objective structure clinical exam, simulated patients) and the range of fees for this group was \$925 (CMTO) - \$4840 (APC).
 - Two of the organizations had a written examination, clinical assessment and structured, supervised training and the fees ranged from \$3840 (CPA) - \$4400 (CPBC).
 - One organization indicated that they charged different fees for the examination for members, non-members, and non-residents in Canada (CMLTO).
 - The total fee charged by the Alliance for both the written (\$775) and clinical (\$1200) components of the examination is \$1975. This is slightly less than the average for organizations with similar processes.
- *Application fees for Independent or Provisional Practice Certificates:*
 - Many Colleges charge an application fee to reflect the administrative costs associated with initial set up of a registrant file
 - This fee information was available for eight of the comparator organizations.
 - Application fees ranged from \$75 (CDHO) to \$358.40 (RCDSO).
 - Registration fees range from \$250 (CDHO) to \$1760 (RCDSO)

- Three organizations (all outside of Ontario) included the application for the independent practice certificate in the fee for the credentialing (CPBC, CPA and HPCUK).
- The College charges a one time application fee of \$100. Two of the comparator organizations also had application fees of \$100 (CMTO and CMRTO), one charged less (CDHO - \$75), while the other five charged more than \$100 (CMLTO, RCDSO, COTO, CPBC and CPA).
- *Additional Fees⁵:*
 - Re-scoring: This information was available for four of the comparator organizations. The range was from \$75-\$150. The Alliance charges \$100 for this service.
 - Administrative Reconsideration (for extraordinary circumstances): Fee information for this service was available for only one organization and they charge \$50. The Alliance charges \$300.
 - Appeals: This information was available from two organizations and both charged \$100. The Alliance charges \$300.
 - File Reviews: Information about fees charged by comparator organizations for file reviews was not available. The Alliance charges \$100.
 - Overall, the Alliance charges higher fees for these additional services based on the information from comparator organizations. However, the low number of comparator organizations where this information was available makes it difficult to ensure accurate and reliable comparison.

5.2.9 What are applicants saying?

College proposed an increase to registration fees in the fall of 2010 and circulated the fee bylaw changes to all registrants (slightly more than 7000) as per statutory requirements; 515 (7%) responded. While a majority of this small cohort was opposed to a fee increase, 30% indicated that they understood or even supported the increase. It is also important to note that the response rate to this call for feedback was significantly lower than usual response rates despite a high open rate of the email notification; suggesting that registrants did not have significant concerns with the proposed change.

Applicant feedback has not specifically been sought in a formal way in relation to fees for credentialing and examination. However we do know that this group consists of new graduates and IEPTs. We also know that both groups experience significant financial challenges.

Both the Alliance and the College are ever mindful of the feedback provided by applicants and registrants and must balance that feedback with the need to ensure effective outcomes within organizational mandate can be met.

Focus 2 Summary

The fees become a registered physiotherapist in Ontario are determined by the Alliance (for credentialing and examination) and the College (for registration). Each organization sets fees annually as part of the budgeting process and examines a variety of fixed and variable factors that are anchored in both the budgeting process and organizational policies. Information about fees is available on both the Alliance and the College websites and is updated regularly.

⁵ The College does not charge a fee for registrants to obtain a copy of their records

As part of this review, the fee schedule for the steps involved in registering as a physiotherapist in Ontario was compared to Canadian and International bodies with a similar volume of applications and staff. The fee charged by the Alliance for the *assessment of credentials and qualifications* is well within the range for organizations with similar credentialing processes. The total fee charged by the Alliance for both the *written and clinical components of the examination* is slightly less than the average for organizations with similar processes, but again well within the range. The College charges a \$100 application fee, which is slightly less than most of the comparator organizations, and a \$600 registration fee which is well within the range of comparators.

In summary, the fees charged by the College and its primary third party assessment agency (The Alliance) are: documented in and compliant with policy, regularly reviewed, comparable to other regulatory organizations, and communicated clearly to applicants. As such, the College's registration fee requirements are reasonable, appropriate, and transparent.

5.3 Focus 3: Decision-making and Appeals

The findings for Focus 3 are discussed by question under two topic areas: timeliness of decision-making, and appeal mechanisms with a focus on communication to applicants (see section 3.3 for background information and a list of specific questions).

Timeliness of Decision-Making

5.3.1 What are the significant registration decisions impacting an applicant?

The College has developed a registration process flowchart that outlines the steps required to register as a physiotherapist in Ontario (see Appendix F). Each of these steps involves a decision that impacts an applicant. The steps are summarized below.

1. Review of credentials/qualifications +/- Prior Learning Assessment Recognition (if necessary)
2. Apply, complete and learn the outcome of the written component of the PCE
3. Apply, for the clinical component of the PCE
4. Apply for a Provisional Practice Certificate (optional)
5. Complete and learn the outcome of the clinical component of the PCE
6. Apply for an Independent Practice Certificate

5.3.2 How long does it take the applicant to receive each of these decisions? What is the consistency with policy for the range of average minimum/maximum times?

The expected timelines, actual (estimated) average time, as well as the minimum and maximum time for decisions for each of the steps for registration of a physiotherapist in Ontario are summarized in Table 2. From this information it is apparent that decisions are made within the expected timelines.

Table 2: Timelines for Registration Decisions for Ontario Physiotherapy Applicants: expected, average, minimum and maximum⁶

Step	Expected Time for Decision? (e.g., policy)	Average Time for Decision?	Minimum/Maximum Time for Decision?
1a. Review of Credentials and Qualifications	<ul style="list-style-type: none"> 4 - 22 weeks from the time a complete⁷ application is received Precedent files⁸: 12-14 weeks Non-Precedent files: 20-22 weeks 	Precedent files ⁷ : 6 weeks Non-precedent files: 12-14 weeks	Minimum: 1 week Maximum: 79 weeks ⁹ 98% <33 wks 85% < 22wks
1b. Completion of PLAR Requirements	<ul style="list-style-type: none"> Applicants have 60 days to apply for PLAR once deemed eligible Applicants have 2 years to complete PLAR requirements¹⁰ 	Extremely Variable (largely applicant dependent) Majority completed within 1 year ⁹	Minimum: 4 weeks Maximum: 4 years ⁹
2a. Application for PCE Part One: Written	<ul style="list-style-type: none"> The written exam is offered 6 times each year i.e. every 2 months) 	Reply within 3 days	Minimum: 1 day Maximum: 10 days
2b. Outcome of PCE Part One: Written	<ul style="list-style-type: none"> Results are mailed within 6 weeks of the exam and are posted on the Alliance website the same day. Results are accessible by the individual using a secure password 	4 - 5 weeks	Minimum: 3 weeks Maximum: 5 weeks
3. Application for PCE Part Two: Clinical	<ul style="list-style-type: none"> The clinical exam is offered 2 times each year in Nov and June Candidates are able to apply for both exam components at the same time 	Reply within 3 days	Minimum: 1 day Maximum: 10 days
4. Application for Provisional Practice Certificate	<ul style="list-style-type: none"> Applications that meet requirements are processed within 10 business days Applications that do not meet requirements are referred to the Registration Committee and the 	Sample testing revealed that 50/52 decisions were made within 10 day timeframe (Trahair,	Minimum: the same day Maximum: the 45 day statutory maximum has never been

⁶ Unless otherwise noted, the source of the information in this table was A. Cooper & T. Eftakari. Personal Communication, February 2011.

⁷ A complete file includes: application form, identity documents, proof of name change (if applicable), passport photos, proof of eligibility from physiotherapy regulatory agency, copy of diplomas/degrees, sections of final research paper, transcript, syllabus course descriptions, credits/hours for courses, and language proficiency score. The Alliance begins assessment before receiving proof of language proficiency (IEPT) or physiotherapy degree (Canadian graduates) (Alliance 2010b).

⁸ A precedent file is one where credentials are substantially similar to a file previously assessed e.g. the same country, same program, same year of graduation (or within the same range with no changes to the course content).

⁹ Statistics from the past five years (2006-2010) indicate that only one file took 79 weeks. The few files that take longer are more complex (e.g., involve two or three educational programs, questions of authenticity) Source: T. Eftakari. Personal Communication, February 2011.

¹⁰ Completion of PLAR requirements is candidate dependent. Possible reasons candidates take longer times to complete requirements include: financial, timing of courses, and personal reasons. Generally the Alliance grants extensions if the standards have not changed.

Step	Expected Time for Decision? (e.g., policy)	Average Time for Decision?	Minimum/Maximum Time for Decision?
	applicant has 30 days to make submission <ul style="list-style-type: none"> Decisions are issued within 45 days 	2009)	exceeded
5. Outcome of PCE Part Two: Clinical	<ul style="list-style-type: none"> Results are mailed within 12 weeks after the exam and are also posted on Alliance website the same day as mailed Results are accessible by the individual using a secure password 	6 - 7 weeks	Minimum: 5 weeks Maximum: 8 weeks
6. Application for Independent Practice Certificate	<ul style="list-style-type: none"> Applications that meet requirements are processed within 10 business days Applications that do not meet requirements are referred to the Registration Committee; the applicant then has 30 days to make a submission Decisions are issued within 45 days 	Sample testing revealed that 50/52 decisions were made within 10 day timeframe (Trahair, 2009)	Minimum: the same day Maximum: the 45 day statutory maximum has never been exceeded

5.3.3 What factors affect the decision-making process?

A number of factors affecting the timeliness of the registration decision-making processes for physiotherapists in Ontario were identified (See Table 3). It should be noted that these factors may impact the timing of decision-making but not the outcomes, as the decisions are guided by strict policies. In addition, the Alliance is able to adapt to many of these factors by adjusting the number of exam sites and locations.

5.3.4 Are timelines for decisions anchored in a documented process or policy? How often is the policy reviewed?

In terms of the timelines for decisions made by the Alliance, all are published in policies and are available in the Candidate Handbooks for credentialing and the examination. The examination policies are reviewed annually when the Handbooks are revised. A new quality reporting program for credentialing and examination has been approved by the Alliance Board of Directors for implementation in 2011. A systematic review of the credentialing program is carried out every 3–4 years. The most current review is underway for 2011. A report on the timelines for credentialing decisions is provided to the Alliance Board of Directors annually¹¹.

In terms of registration decisions made by the College, the timelines are published on its website and in application guides. Since 2006 the College has used a “Balanced Scorecard Approach” to monitor a variety of quality markers. Timelines for registration decisions are measured on the scorecard and reported to the Council quarterly (College of Physiotherapists of Ontario, 2009).

¹¹ A. Cooper & T. Eftakari. Personal Communication, February 2011.

Table 3: Factors Affecting the Timing of Registration Decisions for Ontario Physiotherapy Applicants

Step	Factors Affecting Decision-Making
1 a. Review of Credentials and Qualifications	Third party contracts, staffing and resources Volume of applications Applicant response times and completeness of applications Precedent vs non-precedent files Time for educational institutions to respond
1b. Completion of PLAR requirements	Candidate response times Availability of external PLAR advisors
2a. Application for PCE Part One: Written Component	Number, timing and location of exam sites Volume of candidates (e.g., higher in May and July for written)
2b. Outcome of PCE Part One: Written Component	Number of exam incidents requiring follow-up Resource and technical issues
3. Application for PCE Part Two: Clinical Component	Number, timing and location of exam sites Volume of candidates (e.g., higher in Nov for clinical)
4. Application for Provisional Practice Certificate	Timing of Registration Committee meetings (only for applications that do not meet requirements) – this is overcome by holding teleconferences when necessary to meet timelines
5. Outcome of PCE Part Two: Clinical Component	Number of exam incidents requiring follow-up Resource and technical issues
6. Application for Independent Practice Certificate	Timing of Registration Committee meetings (only for applications that do not meet requirements) – this is overcome by holding teleconferences when necessary to meet timelines

5.3.5 What is the impact of the Pan Canadian framework? Do the College and its third party assessors meet the intent of this Framework?

The Pan-Canadian Framework for the Assessment and Recognition of Foreign Qualifications was approved in 2010 and articulates a new national vision, guiding principles and desired outcomes for improving the assessment and recognition of newcomers' qualifications in cooperation with the provinces and territories. Under the Framework, recognition of foreign credentials and experience will be streamlined for eight priority occupations, including physiotherapists. This means that foreign-trained workers who submit an application to be licensed or registered to work in certain fields will be advised within one year whether their qualifications will be recognized. Otherwise, they will be advised of additional requirements or be directed to alternative occupations that would benefit from their skills and experience (Government of Canada, 2010).

The Alliance sought and received clarification from the Forum of Labour Market Ministers last year on the intent of this statement (see Appendix G). According to this document, the one-year time frame begins when all required materials for credentialing assessment are received and ends after the candidate is notified of the outcome of the review of credentials and qualifications. The registration processes for physiotherapy applicants in Ontario meets the intent of this framework. During the past five years, 98% of applicants received credentialing results within 33 weeks. The one file that exceeded the 52 week timeframe was extremely complex, involved liaising with a number of different education programs and aroused questions of authenticity (see Table 3).

5.3.6 How do the timelines for decisions compare to other Canadian and international regulators with similar volume of applicants and staff?

A summary of timelines for registration process decisions by other selected Canadian and international regulators is provided in Appendix H. The following compares the time to process the registration of a physiotherapist in Ontario (as outlined in Table 2) to that of the comparable regulatory organizations for each of the key steps in the registration process:

- *Credential review*: For the comparator organizations where this information was available (n=8), the length of time to complete a credential review ranged from 6 weeks (APC) to 1.5 years (CMTO) with the average being 10 weeks, once all of the necessary documents were received. The Alliance indicated that the average time to credential an application was 6 weeks for a precedent file and 14 weeks for a non-precedent file.
- *Completion of Prior Learning Assessment (PLA) requirements*: Only one of the comparator organizations had a PLA program with documented timelines. The timeline was two years which is the same as the Alliance requirement.
- *Examination*: The number of times written examinations were offered by seven of the comparator organizations ranged from one to five times per year, with the average being four times per year (n=7). Two additional comparator organizations indicated that the exam could be written at any time (CMTO and FSBPT). The Alliance examination written component is offered six times per year. Three of the comparator organizations offered clinical exams and these were offered one, three and twenty times per year. The Alliance conducts the clinical component of the examination twice per year.
- *Application for Provisional Practice Certificate*: Three of the comparator organizations offer some type of provisional practice certificate (COTO, CPBC, CPA). In all of these cases the candidate has been credentialed before the application is reviewed. In one case, the candidate is waiting to write an examination. In the other two cases, the provisional certificate is a requirement for a supervised clinical training program. The timelines for processing these requests were not available. The College processes these applications within 10 days, once the file is complete.
- *Application for Independent Practice Certificate*: For the comparator organizations where information about the time to process an application for a practice certificate was available (n=6), the range was from 1-8 weeks, with the average being 3-4 weeks. The College processes these applications within 10 days, once the file is complete.

Appeal Mechanisms

5.3.7 How can an applicant appeal the decisions?

Each step of the process for registration as a physiotherapist in Ontario has its own appeal mechanisms. These are summarized in Table 4.

Table 4: Registration Decision Appeal Mechanisms for Ontario Physiotherapy Applicants

Step	Appeal Mechanism
1a. Review of Credentials and Qualifications	<ul style="list-style-type: none"> • Following a credential review, candidates have 60 days to submit additional information to support their application • Candidates can also apply for an internal administrative reconsideration and/or an independent appeal (Alliance 2010 a) ¹²
1b. Completion of PLAR requirements	<ul style="list-style-type: none"> • Candidates can continue to submit additional info to the Alliance to demonstrate they have met a requirement while completing other PLAR requirements. • Candidates must sign a PLAR agreement that includes an option plan indicating how the candidate intends to fill each of the identified gaps. The option plan can be modified at any time by notifying the Alliance in writing. • In most cases the PLAR must be completed within 2 years however candidates can apply for extension extraordinary circumstances
2b. Outcome of PCE Part One: Written Component	<p>Applicants who are unsuccessful have three options:</p> <ol style="list-style-type: none"> i. Re-apply and take the exam again ii. Request re-scoring: requests for rescoring must be made within 30 days of results notification. Results of rescoring are provided within 2-3 wks iii. Request an administrative reconsideration (AR): requests for AR must be made within 14 days of the exam for health reasons or 30 days after the exam results are sent for administrative or other extraordinary circumstances. Candidates can appeal the AR by submitting a request within 30 days of receiving AR response. An independent panel is assembled to consider all information.
4. Application for Provisional Practice Certificate	<ul style="list-style-type: none"> • Applications are reviewed initially by staff. If all requirements are met, the applicant is registered within 10 business days • Applications that do not meet requirements are referred to the Registration Committee for review. Applicants are given 30 days to make submissions to support their application. Committee options in terms of decisions are defined in RHPA Sched 2 S 18(2). Formal decision and reasons are released within 45 days.

¹² If results of a credential review are unsuccessful, the candidate can submit additional info within 60 days without charge and this can be repeated several times. If the result is still no, then a candidate can apply for administrative reconsideration where an independent investigator is appointed to review the file. If the result is still no, the candidate can apply for an appeal where an independent panel is assembled to consider all of the information. The Alliance has only had one credentialing appeal in 16 years.

Step	Appeal Mechanism
	<ul style="list-style-type: none"> • Appeals of Registration Committee decisions are conducted by the Health Professions Appeal and Review Board (HPARB).
<p>5. Outcome of PCE Part Two: Clinical Component</p>	<p>Applicants who are unsuccessful have three options :</p> <ol style="list-style-type: none"> i. Re-apply and take the exam again ii. Request re-scoring: requests for rescoring must be made within 30 days of results notification. Results of rescoring are provided within 3-4 weeks iii. Request an administrative reconsideration (AR): requests for AR must be made within 14 days of the exam for health reasons or 30 days after the exam results are sent for administrative or other extraordinary circumstances. Candidates can appeal the AR by submitting a request within 30 days of receiving AR response. An independent panel is assembled to consider all information. iv. Candidate may request a file review which provides more details about the individual's performance on the Clinical Component. Each file review will be different depending on the examiners' comments and on the trends in performance
<p>6. Application for Independent Practice Certificate</p>	<ul style="list-style-type: none"> • Applications are reviewed initially by staff. If all requirements are met, the applicant is registered within 10 business days • Applications that do not meet requirements are referred to the Registration Committee for review. Applicants are given 30 days to make submissions to support their application. Committee options in terms of decisions are defined in RHPA Sched2 S 18(2). Formal decision and reasons are released within 45 days. • Appeals of Registration Committee decisions are conducted by the Health Professions Appeal and Review Board (HPARB).

5.3.8 How does the applicant know how to appeal? When is the appeal information provided? Can the transparency and availability of appeal information be streamlined?

Information about how and when appeal information is provided for each of the steps in the registration process is included in Table 5. Generally this information is available prior to application for credentialing and the examination. It should be noted that the Alliance has had only five appeals in the 17 year history of the exam. However, there have been a much larger number of administrative reconsiderations (e.g., illness, death in family, administrative irregularities). Alliance representatives indicated that the appeal policy is currently under review and the following are under consideration:

- Making timelines more explicit
- Streamlining administrative reconsiderations
- Further ensuring procedural fairness (e.g., ensuring no conflict/bias affects decision-making during administrative reconsideration)
- streamlining the transparency and availability of appeal information: e.g. expanding the information in the Handbooks and/or adding more information on the Alliance website

Table 5: Availability of Appeal Information for Ontario Physiotherapy Applicants

Step	How/When is appeal info provided?
1a. Review of Credentials and Qualifications	<ul style="list-style-type: none"> General info about appeal processes is available prior to application in the Credentialing Handbook and the Q and A documents available on the Alliance website Additional details are provided to unsuccessful candidates and telephone support is available
1b. Completion of PLAR requirements	<ul style="list-style-type: none"> Info is available in the Credentialing and Q and A documents on the Alliance website
2b. Outcome of PCE Part One: Written Component	<ul style="list-style-type: none"> Appeal info is available prior to application in the Examination Handbook and the Q and A documents posted on the Alliance website Additional details are provided to unsuccessful candidates and telephone support is available
4. Application for Provisional Practice Certificate	<ul style="list-style-type: none"> Written info on the appeal process through HPARB is provided with all Registration Committee decisions and telephone support is available
5. Outcome of PCE Part Two: Clinical Component	<ul style="list-style-type: none"> Appeal info is available prior to application in the Examination Handbook and Q and A documents posted on the Alliance website Additional details are provided to unsuccessful candidates and telephone support is available
6. Application for Independent Practice Certificate	<ul style="list-style-type: none"> Written info on the appeal process through HPARB is provided with all Registration Committee decisions and telephone support is available

5.3.9 How do the appeal processes/timelines compare to other regulatory bodies?

A summary of appeal processes by other Canadian and international regulators with similar volume of applicants and staff to those of the College is provided in Appendix I. Overall the appeal policies for physiotherapy are in line with those for the other organizations reviewed. The following provides a comparison of appeal processes across organizations for the key steps in the registration process, and availability of appeal information:

- Credential review:** Most of the comparator organizations allow unsuccessful applicants to submit additional documents within a set timeframe to support their application. One organization indicated that credentialing assessments are final and cannot be appealed (CMTO). Two organizations have some type of assessment examination as part of the credential review and these allow requests for manually re-scoring from unsuccessful candidates. Some indicated that appeals can be made to the Health Professions Appeal and Review Board (HPARB). The Alliance allows candidate with unsuccessful credentialing outcomes 60 days to submit additional info and this process can be repeated several times without charge. If the result is still no, then candidate can apply for administrative reconsideration where an independent investigator is appointed to review the file. If the result is still no, the candidate can apply for an appeal where an independent panel is assembled to consider all of the information.

- *Examination:* The majority of the comparator organizations with exams (n-9) will manually remark exams if a request is made in writing within a set time frame that varies from 14-90 days. Most allow examination appeals only on the grounds of extraordinary circumstances (e.g., illness, administrative issues). The Alliance appeal policies allow for manual rescoring if request made within 30 days. Applicants may request administrative reconsideration for health, administrative reasons or extraordinary circumstances.
- *Application for Practice Certificate:* Most of the organizations reviewed have similar processes for application for a practice certificate. Applicants who do not meet the registration requirements may submit additional information to the Registration Committee for review. If they are still not deemed eligible and wish to appeal the decision, appeals may be made in Ontario to the HPARB. The process is statutory for all regulators in Ontario, including the College.
- *Availability of appeal process information:* The majority of the comparator organizations have some information about appeal mechanisms available on their websites and in their credentialing/examination documentation. However the level of detail of the information varies between organizations. Some state that more detail about appeals is provided to unsuccessful candidates with their exam results. The Alliance has information on credential and exam appeals on their website and indicates more is provided with upon notification failure. The College provides detailed written information about registration appeals with the written decision of the Registration Committee, when it is most useful to the candidate.

5.3.10 What are applicants saying?

Every individual who contacts the Entry to Practice team is offered an opportunity to provide feedback on the interaction as part of the College's customer excellence strategy. To ensure authenticity of feedback respondents are anonymous. While applicant responses cannot be separated from registrant responses, we are able to continuously learn from the feedback provided. A recent review of responses indicates that while the vast majority of respondents (88%) are satisfied with their interaction with the Entry to Practice team and 92% indicate that information is clear and easy to understand, some indicate that it can be difficult to navigate the volume of information available on the College website. Applicants are interested in receiving information that is specific to their individual and unique circumstance and therefore value the opportunity to speak to a member of the Entry to Practice team.

Additionally, in April 2010 the College launched a Transitioning to Professional Practice Program (TPPP) intended to achieve the following:

- To promote the early interaction of students and applicants with the College.
- To provide information and education related to College standards, programs and resources that support professional practice.
- To engage new registrants in College initiatives and their accountability as self regulating professionals.

As part of the TPPP the College introduced a pre-registration option to allow closer contact with and to learn from applicants (new graduates and IEPTs). We look forward to sharing the outcomes of this initiative as they become available.

Summary focus 3

The summary findings for Focus 3 are discussed under two topic areas: timeliness of decision-making, and appeal mechanisms, with a focus on communication to applicants under each.

Timeliness of Decision-Making

There are six significant registration decisions involved in registering as a physiotherapist in Ontario including: Review of Credentials and Qualifications; Physiotherapy Competency Examination Written Component; Application for Physiotherapy Competency Examination Clinical Component; Application for a Provisional Practice Certificate; Physiotherapy Competency Examination Clinical Component; and Application for an Independent Practice Certificate. The applications for provisional and independent practice certificate are the responsibility of by the College, while the others are carried out by the Alliance on behalf of the College.

Based on the information reviewed, registration decisions for physiotherapy applicants in Ontario are made within fair, reasonable, and expected timelines that are comparable to other Canadian and international regulators with similar volumes of applicants and staff. A number of factors affecting the timing of registration decisions were identified including: volume of applicants; incomplete applications; precedent Vs non-precedent files; length of time for educational institutions to respond; resource/technical issues; and exam incidents requiring follow up. It should be noted that these factors may impact the timing of decision-making but not the outcomes, as these are guided by strict policies. In addition, the Alliance is able to adapt to many of these factors by adjusting the number of exam sites and locations in order to minimize impact on applicants.

The expected timelines for decisions made by the Alliance, are all published in policies in the Candidate Handbooks and are reviewed on an annual basis. The timelines for registration decisions made by are published on its website and in application guides. The College uses a “Balanced Scorecard Approach” to monitor timelines and reports are made to the Council quarterly.

The Pan-Canadian Framework for the Assessment and Recognition of Foreign Qualifications was approved in 2010. Under the Framework, recognition of foreign credentials and experience will be streamlined so that foreign-trained workers who submit an application to be licensed or registered to work in certain fields will be advised within one year whether their qualifications will be recognized. The Alliance meets the intent of this framework, in particular the requirement to ensure notification of credential evaluations within one year (33 weeks is the worst case scenario).

Appeal Mechanisms

Each step of the process for registration as a physiotherapist in Ontario has its own appeal mechanism. Overall the appeal mechanisms for physiotherapists are fair, objective, impartial, transparent and similar to the mechanisms of the other comparator organizations reviewed. Information about appeal mechanisms is available on the Alliance website prior to application for credentialing and the examination. The College provides detailed written information about appeals with the decision, when it is most useful to the candidate.

In *summary*, the decision-making practices and appeals processes of the College and its third party assessment agency (The Alliance) are documented in and compliant with policy, meet defined timelines, are communicated clearly to applicants and meet the intent of the Pan Canadian Framework. As such, the College's decision-making and appeals registration practices are fair, objective, impartial and transparent.

6.0 Recommendations

Focus 1: An analysis of the necessity and relevance of the requirements for practical training or work experience

1. The multiple measure approach currently used by the College¹³ to ensure currency and competency continues to be necessary, relevant and appropriate.
2. The requirement to maintain 1200 hours of practice within the previous 5 years - as a measure of currency and a screening tool for ongoing competence - remains necessary, relevant and appropriate. There is insufficient evidence to alter or eliminate the practice hour requirement.
3. The College should continue to monitor the emerging literature and the practice of other regulators to maintain awareness with respect to the number of practice hours and time period for collection and ensure continuation of College best practices as this may be an evolving area.

Focus 2: An analysis of the reasonableness of fees

1. The fees charged by the College and its primary third party assessment agency (The Alliance) are documented in and compliant with policy, undergo regular review, are comparable to other regulatory organizations, and are communicated clearly to applicants. As such, the registration fees for Ontario physiotherapy applicants are not only reasonable but are also fair, objective, impartial and transparent.
2. While fee information is readily available to applicants, there is an opportunity to further enhance transparency and ease of finding fee information. For example, the College could consider updating the Registration Process flow chart to include fees and/or develop a fee webpage for the College website.
3. The College should continue to monitor the fees and practices of other regulatory organizations to maintain awareness and ensure continuation of College best practices with respect to the reasonableness of fees.
4. The College should continue to maintain a collaborative relationship and share information with The Alliance. This will allow mutual awareness of best practices as well as facilitate transparency, access and clarity of fee information provided to applicants.

Focus 3: An analysis of the efficiency and timeliness of decision-making (including decisions related to assessment, registration and appeals).

1. The decision-making practices and appeals processes of the College and its third party assessment agency (The Alliance) are documented in and compliant with policy, meet defined timelines, are communicated clearly to applicants and meet the intent of the Pan Canadian Framework. As such, the College's registration practices related to decision-making and appeals are fair, objective, impartial and transparent.

¹³ Measures include a declaration of 1200 hours of practice in the previous 5 years (as a screening tool to identify individuals at risk of not maintaining competence); jurisprudence testing initially and at 5 year intervals (to ensure knowledge of the rules) and peer assessment of a random selection of 5% of the registrant base

2. The College should continue to explore ways to enhance transparency and clarity of information with respect to timelines for decision-making. For example, the College could update the Registration Process flow chart to include timelines.
3. While information on appeals is readily available at the time it is needed, wanted and useful to applicants, the College should continue explore ways to enhance transparency and clarity of appeal information. For example, appeal information could be made available on the College website.
4. The College should continue to monitor the timelines and practices of other regulatory organizations to maintain awareness and ensure the continuation of College best practices with respect to timeliness and efficiency of decision-making.
5. The College should continue to maintain a collaborative relationship and share information with The Alliance. This will allow mutual awareness of best practices as well as facilitate transparency, access and clarity of appeal information provided to applicants.

7.0 Implementation Plan

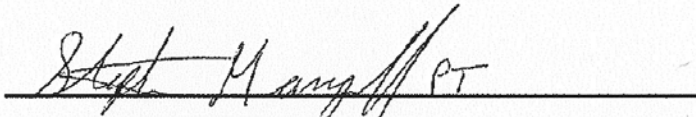
Recommendation	Goal	Timeline	Challenges	Strategies	Responsibility	Resource Commitment
The requirement to demonstrate 1200 hours of practice within the previous 5 years as a proxy measure is necessary, relevant and appropriate.	No change required	NA	NA	monitor	College Council through Registration Committee and Entry to Practice Staff	No additional resources required
Fees are reasonable fair, objective, impartial and transparent.	No change required	NA	NA	monitor	College Council through Registration Committee and Entry to Practice Staff	No additional resources required
Registration practices (decision-making and appeals) are fair, objective, impartial and transparent.	No change required	NA	NA	monitor	College Council through Registration Committee and Entry to Practice Staff	No additional resources required
The College will continue to examine ways to enhance access, transparency and clarity in the communication of information to applicants.	1. Update the Registration Process flow chart to include fees and/or develop a fee webpage for the College website	3 months	None anticipated	Request communications staff to revise the Registration Process flowchart	Communications staff with Director Entry to Practice	Resources are available internally
	2. Update the Registration Process flow chart to include timelines	3 months	None anticipated	Request communications staff to revise the Registration Process flowchart	Communications staff with Director Entry to Practice	Resources are available internally

	3. Consider making appeal information available on the College website	6 months	Given that appeals are conducted by an external body (i.e. HPARB) it may be better to link to their website	Discuss internally and liaise with HPRAC	Director of Entry to Practice with internal College Program staff	Resources are available internally
The College will continue to monitor the emerging literature and the practice of other regulators in the areas reviewed (i.e. practice hours, fees and decision-making (including appeals)).	No change required	NA	NA	Continue current methods of environmental scanning, networking, internal review and information gathering	College Council through Registration Committee and Entry to Practice Staff	No additional resources required
The College will continue to maintain a collaborative relationship and share information with The Alliance.	No change required	NA	NA	Continue current methods of communication, collaboration, and information sharing	College Council through Registration Committee and Entry to Practice Staff	No additional resources required

8.0 Statement of Approval

The undersigned verify and commit to the following:

- this Entry to Practice Review Report, 2010 submitted by the College of Physiotherapists of Ontario contains the required information as outlined the Fairness Commissioners letter of June 14, 2010 and the Entry to Practice review guide found on the OFC website
- the information contained in this report is an accurate representation of the data gathered on behalf of the College by Parker-Tailion Consulting Inc. and the processes and policies of the College
- the College will direct appropriate resources to meet the recommendations and implementation plan outlined in the report

A handwritten signature in black ink, appearing to read "Stephen Mangoff PT", written over a horizontal line.

Stephen Mangoff, Chair, Registration Committee, College of Physiotherapists of Ontario

A handwritten signature in black ink, appearing to read "Jan Robinson", written over a horizontal line.

Jan Robinson, Registrar, College of Physiotherapists of Ontario

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Appendix A

List of Regulatory Bodies of Similar Size and Regulatory Scheme

Canadian Regulatory Organizations

- College of Medical Laboratory Technologists of Ontario (CMLTO)
- College of Medical Radiation Technologists of Ontario (CMRTO)
- Royal College of Dental Surgeons of Ontario (RCDSO)
- College of Massage Therapists of Ontario (CMTO)
- College of Dental Hygienists of Ontario (CDHO)
- College of Occupational Therapists of Ontario (COTO)
- College of Physiotherapists of British Columbia (CPTBC)
- College of Pharmacists of British Columbia (CPBC)
- College of Physiotherapists of Alberta (CPTA)
- College of Pharmacists of Alberta (CPA)

International Physiotherapy Organizations

- Australia: Australian Physiotherapy Council (APC)
- United Kingdom: Health Professions Council (HPCUK)
- United States: Federation of State Boards of Physical Therapy (FSBPT)

Appendix B

List of Key Informants

Focus 1 (practical training or work experience)

Brenda Hudson, Registrar
College of Physical Therapists of British Columbia

Dianne Millette, Registrar
College of Physical Therapists of Alberta

Susan Glover Takahashi, Director of Education and Research
Post Graduate Medical Education, University of Toronto

Mark Lane, Vice President
Federation of State Boards of Physiotherapy

Marc Seale, Chief Executive and Registrar
Health Professions Council, United Kingdom

Focus 2 (fees)

Alison Cooper, Director of Examinations
Canadian Alliance of Physiotherapy Regulators

Tabasom Eftekari, Director of Credentialing and Corporate Services
Canadian Alliance of Physiotherapy Regulators

Focus 3 (decision-making)

Alison Cooper, Director of Examinations
Canadian Alliance of Physiotherapy Regulators

Tabasom Eftekari, Director of Credentialing and Corporate Services
Canadian Alliance of Physiotherapy Regulators

Appendix C: Summary of Methods Used to Measure Currency and Competency by Comparable Canadian Regulators

Regulatory Organization	Learning Needs Self Assessment	Learning Goals/ Plan	Prof. Dev't Log/ Portfolio	QA Declaration	Practice Consultants	Peer Assessment	Assessment Component	Practice Hour Requirement
1. College of Medical Laboratory Technologists of Ontario (CMLTO)	X	X	X -30 hrs CPD req'd -Random audit	X			X -Practice review assessment (jurisprudence-focus) -Random selection ¹⁴	Annual reporting of practice hours for renewal - no minimum req't
2. College of Medical Radiation Technologists of Ontario (CMRTO)	X	X	X -25 hrs CPD req'd	X				No practice hour requirement
3. Royal College of Dental Surgeons of Ontario (RCDSO)			X	X	X		X -Computer based self assessment ¹⁵	No practice hour requirement
4. College of Massage Therapists of Ontario (CMTO)	X	X	X			X-Visit clinic ¹⁶		Requirement of 500 hours direct client care within previous 3 years

¹⁴ Practice Review Assessment is comprised of 25 case scenarios from which a member has to select a correct response. Topics include legislation, expectations of practice, consent to treatment, privacy and confidentiality, professionalism and collaboration

¹⁵ Computer-based self assessment program being developed that will allow members to evaluate their practice, knowledge, skill and judgement based on peer-reviewed standards

¹⁶ Members randomly selected to have peer assessor visit their clinic

Regulatory Organization	Learning Needs Self Assessment	Learning Goals/ Plan	Prof. Dev't Log/ Portfolio	QA Declaration	Practice Consultants	Peer Assessment	Assessment Component	Practice Hour Requirement
5. College of Dental Hygienists of Ontario (CDHO)	X		X Prof. Portfolio			X Audit Prof. Portfolio (10%/yr)	X Jurisprudence Module ¹⁷	Annual reporting of practice hours for renewal – no minimum req't
6. College of Occupational Therapists of Ontario (COTO)	X	X	X Prof. Portfolio -Random audit			X Multi-source feedback survey ¹⁸		Requirement of 750 hours within the last 3 years; or 1550 hours within the last 5 years ¹⁹
7. College of Physiotherapists of British Columbia (CPTBC)							X -On-line annual self-report (jurisprudence-focus) ²⁰ -Competence assessment exam every 6 yrs (2012) ²¹	Requirement of 1200 hours within the last 5 years

¹⁷ Jurisprudence modules involve two parts: an on-line course and a quiz (based on materials developed by CPO)

¹⁸ Multi-source feedback survey involves peers, co-workers and clients completing a practice feedback survey to collect information in relation to professional standards. Is part of random audit of portfolio

¹⁹ Submitting request to change requirements to 600 hours over three years. Rationale: Continuing education literature indicates three year period of retention of skills if not practiced

²⁰ On-line annual self report related to knowledge and understanding of professional, legal and ethical obligations

²¹ Competence assessment exam will involve a case-based assessment tool that tests decision making skills with regards to specific clinical areas

Regulatory Organization	Learning Needs Self Assessment	Learning Goals/ Plan	Prof. Dev't Log/ Portfolio	QA Declaration	Practice Consultants	Peer Assessment	Assessment Component	Practice Hour Requirement
8. College of Pharmacists of British Columbia (CPBC)	X	X	X -15 hrs/yr CPD req'd (2012)				X Knowledge assessment Exam every 10 yrs (2012) ²²	No practice hour requirement
9. College of Physiotherapists of Alberta (CPTA)	X	X	X			On-site assessment to be dev'd (Practice Visits)	Jurisprudence Module every 5 yrs (piloting)	Requirement of 1200 hours within the last 5 years
10. College of Pharmacists of Alberta (CPA)	X	X	X -15 CEU's/ yr req'd -Random audit			On-site assessment to be revised (20110	Knowledge Assessment Examination ²³	No practice hour requirement

²² About to launch newly approved program. A total of 10% of registrants will be randomly selected yearly to write the examination

²³ Introducing a new peer-based competence program that will measure 10% of registrants annually. Candidates are randomly selected and must complete the "knowledge assessment" examination that is computer adapted and mediated, or at their discretion may complete a practice portfolio that provides evidence of their competence to perform the competencies within their current role

Appendix D: Summary of Feedback from Applicants Participating in the College Review Program Secondary to Insufficient Practice Hours

Question	Scale	Range	Average
How would you rate your level of confidence that the assessment reflects the care you provide to patients?	1 (low) to 5 (high)	4 - 5	4.4
How relevant were each of the components of the assessment?	1 (low) to 5 (high)	4 - 5	4.6
Please rate the educational value of the assessment	1 (low) to 5 (high)	3 - 5	3.8
Was the amount of time spent preparing for the assessment acceptable?	Yes or No	5/5 Yes	NA
Was the amount of time spent in the assessment acceptable?	Yes or No	3/5 Yes	NA
<p>Comments:</p> <ul style="list-style-type: none"> • “It was a good learning experience” • “the process is stressful but does help identify, implement and follow standards” • “although the experience was positive for me, I don’t see how the goal of public protection is being met” • “giving 3 months notice is too much, the college should just come in with a weeks notice” • “The discussions about client issues etc was a good learning experience and thought provoking” 			

Appendix E: Summary of Registration Fees for Comparable Regulatory Bodies National and International²⁴

Organization	Credential Review ²⁵	Examination	Application for Independent Practice Certificate
1. College of Medical Laboratory Technologists of Ontario (CMLTO)	Canadian Society for Medical Laboratory Science (CSMLS) Prior Learning Assessment Fee \$800.00	CSMLS written exam fees: >Member \$450 >Non member \$675 >Non-resident in Canada (\$1350)	Application fee \$169.50 (inc HST) Certificate fee \$305.10 (inc HST)
2. College of Medical Radiation Technologists of Ontario (CMRTO)	CMRTO Application (\$100) and Evaluation Fee (\$250) plus HST: \$395.50	Canadian Association of Medical Radiation Technology (CAMRT) written exam fee: \$800	Application Fee \$113 .(inc HST) Certificate fee \$531.10
3. Royal College of Dental Surgeons of Ontario (RCDSO)	2 Mechanisms for entry for IE: - Two year qualifying program: \$90-140,000 - National Dental Examining Board (NDEB) Equivalency Process: approx. \$6600 including: >Application: \$500 >Assess Fundamental knowledge: \$600 >Assess Clinical Skills: \$4000 >Assess Clinical Judgment: \$1500	NDEB 2011 exam fee: \$2000 including: >Application fee: \$400 >Written exam: \$700 >OSCE: \$900	Application Fee: \$250 Registration Fee \$100 Certificate fee \$1760
4. College of Massage Therapists of Ontario (CMTO)	CMTO Credentialing Fee \$1475 including: >Application fee: \$175 >Diagnostic Assessment Fee: \$1300	CMTO 2010 exam fee: \$925 including: >Written: \$225 >Clinical: \$700	Application fee \$100 Certificate fee \$555
5. College of Dental Hygienists of Ontario (CDHO)	Total \$500 including: >Initial application fee \$75 >National Dental Hygiene Certification Board (NDHCB) Assessment: \$425 -May also need assessment by CDHO: \$250 (if not deemed eligible for NDHCB exam)	Total: \$1035 or \$575 plus taxes including: >NDHCB exam fee: \$535 plus taxes or CDHO Provincial written exam: \$75 >CDHO Clinical Competency Assessment: \$500	Application Fee: \$75 Certificate Fee: \$250

²⁴ This information was obtained from websites of relevant organizations. All fees are in Canadian Dollars unless otherwise specified. CPTBC and CPTA not included as the Alliance completes credential reviews and examinations for these organizations

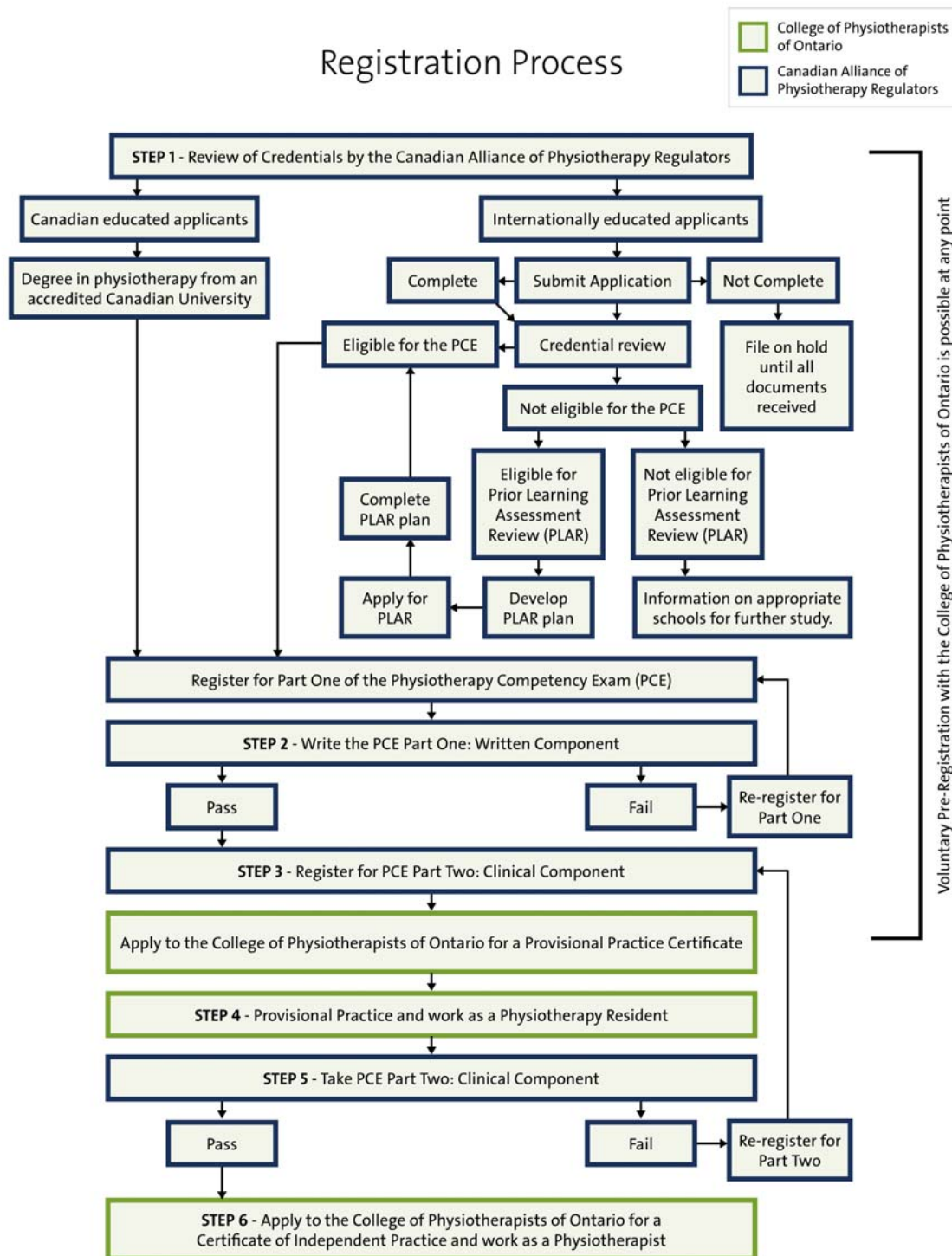
²⁵ Credentialing fees listed here do not include fees for external assessments by third parties or language testing (when necessary).

Organization	Credential Review ²⁵	Examination	Application for Independent Practice Certificate
6. College of Occupational Therapists of Ontario (COTO)	Total \$395 including: >Initial registration application fee: \$226.00 >Academic Equivalency Review: \$169.50	Canadian Association of Occupational Therapy (CAOT) written exam: \$440 plus taxes	Application Fee: \$226 (inc HST) Certificate fee \$738.65 (inc HST)
7. College of Pharmacists of British Columbia CPBC)	Total 1403.40 including: >CPBC fee for Application/Pre-registration \$358.40 >Pharmacy Examining Board of Canada (PEBC) Document Evaluation: \$530 >PEBC Evaluating Exam: \$515	Total \$4400 including: -CPBC Structured Practical Training: \$560 -PEBC Qualifying Exam: >Part I MCQ: \$400 >Part II OSCE: 1520 >Exam Total: \$1920	Application fee \$358.40 (inc HST) (Paid as part of Credential Review fees)
8. College of Pharmacists of Albert (CPA)	Total 1302.25 including: >CPA application fee for Provisional Register \$257.25 >PEBC fees same as BC	Total \$3840 including -CPA Structured Practical training (included in fee for Provisional Register) -PEBC fees same as BC	Application fee \$257.25 (inc GST) (Paid as part of Credential Review fees)
9. Federation of State Boards of Physical Therapy (FSBPT) – United States	Credentialing is done by individual state licensing authorities-fees not available	Total \$440 including: >FSBPT written Exam \$370 US ²⁶ (2010). >Prometric Fee \$70.US	Registration is done by individual state licensing authorities
10. Health Professions Council (HPCUK) - United Kingdom (Includes Physiotherapy)	HPC Credentialing fee: 420 pounds sterling (\$672)	No exam	Included in credentialing application fee
11. Australian Physiotherapy Council (APC)	APC) Initial assessment fee: \$990AUD ²⁷	Total \$4840 AUD including: >APC Written Assessment: \$1540. AUD >APC Clinical Assessment: 3 x \$1100 = \$3300 AUD	Information not available

²⁶ At the time of the report the US and Canadian dollars are nearly par

²⁷ At the time of the report the Australian and Canadian dollars are at par.

Appendix F: Registration Process Flow Chart



Appendix G



Interpretation of the One-Year Commitment to Timely Service

The *Pan Canadian Framework for the Assessment and Recognition of Foreign Qualifications* (the Framework) states:

“Our goal is that within one year, an individual will know whether their qualifications will be recognized or be informed of the additional requirements necessary for registration, or be directed towards related occupations commensurate with their skills and experience”.

At their meeting in August 2010, federal, provincial and territorial senior officials (responsible for labour market and immigration) approved the following interpretation of the one-year commitment to timely service:

“The one-year begins once all documents and fees required to process the applications are provided to the relevant regulatory authority and ends after the candidate has received a decision related to the assessment of his/her foreign qualifications.”

In other words, the one-year commitment refers to the length of time it takes to conduct an assessment of foreign qualifications (including education and work experience) and to communicate the outcome to an individual.

The following activities should be completed within the one-year period: verification of document authenticity and good standing; and assessment of the equivalency of education and work experience. The one-year commitment would exclude other assessment steps such as qualifying exams, additional training, internships, provisional licence and required work experience. Because these latter steps represent important decision points along the pathway to licensure/registration, an immigrant may not receive a final decision with regards to licensure/registration within one year.

While the one-year commitment refers to an earlier decision point along the pathway to recognition, it is important to recognize that this is only one part of the broader concept of timeliness and that timeliness applies to all the steps in the pathway. Once the one-year commitment has been met, occupations are still strongly encouraged to address delays and gaps in the next steps of the pathway to labour market integration.

Implementation of the Framework will continue to identify possible improvements along the entire pathway to recognition and labour market integration. Stakeholders will be urged to identify improvements where necessary to ensure that practices are timely, fair, transparent, and consistent.

Appendix H: Summary of Timelines for Registration Decision-Making by Comparable regulatory Bodies National and International²⁸

Registration Steps/ Organization	Credential Review	Prior Learning Assessment (PLA) Programs	Examination	Application for Provisional Practice Certificate	Application for Practice Certificate
1. College of Medical Laboratory Technologists of Ontario (CMLTO)	-Credential evaluation done by external organizations (ICES or WES) - PLA by Canadian Society for Medical Laboratory Science (CSMLS) may take 6 weeks	-If minor gaps identified must have learning plan and have two years to complete	-CSMLS exam offered 3x/year: results sent within 45 days	N/A	-Expected time for registration decisions by CMLTO >3wks if application complete >8 wks if referred to CMLTO Reg. Committee -Average times: >4 days if file complete >depends on meeting schedule-decision mailed within 4 wks of meeting
2. College of Medical Radiation Technologists of Ontario (CMRTO)	-Credentialing Applications assessed by CMRTO Registration Committee may take 4 months	-External Bridging programs offered by three education institutions in Canada -Length varies depending on gaps	- Canadian Association of Medical Radiation Technology (CAMRT) exam offered 3x/year	N/A	-Once have completed all requirements including exam, registration may be done same day or up to 2 wks depending on communication method
3. Royal College of Dental Surgeons of Ontario (RCDSO)	-2 paths to becoming eligible for exam: >Full time two year qualifying program, or >Equivalency process by National Dental Examining Board (NDEB) which has three parts (Assessments of knowledge, clinical skills and clinical judgment)	N/A	-Exam administered by the NDEB >Written exam offered 3x/year >Objective Structure Clinical Examination (OSCE) offered 3 x/year	N/A	-Once have completed all requirements including exam, RCDSO reg. department processes applications -Some cases referred to RCDSO Reg. Committee. If more info required candidate has 30 days to respond -Standard processing time is 2-3 weeks

²⁸ Note: The timelines and processes indicated are based on the application of an internationally educated health professional. The information provided reflects what was available from respective websites and varies somewhat between organizations.

Registration Steps/ Organization	Credential Review	Prior Learning Assessment (PLA) Programs	Examination	Application for Provisional Practice Certificate	Application for Practice Certificate
4. College of Massage Therapists of Ontario (CMTO)	<ul style="list-style-type: none"> - CMTO conducts Credential and Prior Learning Assessment (CPLA) to determine eligibility of the CMTO exam -The average amount of time from the date of application until the applicant is eligible to register is 3 months²⁹. -The average length of time for internationally educated is 19.5 months 	N/A	<ul style="list-style-type: none"> -Exam administered by CMTO >Written exam may be taken at any time at an exam center: results are available immediately >OSCE exam offered on approx. 20 days/year: results are mailed 2 wks after the exam 	N/A	<ul style="list-style-type: none"> -Once documents are received an application is referred to next CMTO Reg. Committee meeting (held monthly 8 times/year) -Decision sent within 3 business days of CMTO Registration Committee meeting
5. College of Dental Hygienists of Ontario (CDHO)	<ul style="list-style-type: none"> -National Dental Hygiene Certification Board (NDHCB) assessment to determine eligibility to write exam takes 8-10 weeks -If not eligible to take NDHCB exam, can request that application be referred to CDHO Reg. Committee that takes 3 months to review. 	N/A	<ul style="list-style-type: none"> -Two examinations required: >NDHCB Written Certification Exam offered 5x/year: results available within 6 wks >CDHO Clinical Competency Assessment offered once/year: results available within 3 wks 	N/A	<ul style="list-style-type: none"> -Once a completed application has been submitted, it takes CDHO approximately 5-10 business days to process

²⁹ Note: According to CMTO, the average timeline for applications may be misleading because the length of time required to obtain the necessary documentation varies between applicants. The time required to complete a bridging program is a factor for non-Ontario graduates, and the need to pay for completing the requirements and examinations are a factor for all applicants (CMTO Fair Practices Registration Report 2009).

Registration Steps/ Organization	Credential Review	Prior Learning Assessment (PLA) Programs	Examination	Application for Provisional Practice Certificate	Application for Practice Certificate
6. College of Occupational Therapists of Ontario (COTO)	-External Credential assessment report (by WES) can take as little as 7 days if agency has all info -Academic equivalency review by COTO takes a minimum of 8 wks up to 1 year	-Have pilot project designed to assist foreign-educated OT's transition into practice in Canada -Program is voluntary and free at present	-Canadian Association of Occupational Therapists (CAOT) exam is offered twice/year -Results are mailed 6-8 wks after the exam	-Candidates waiting to write the CAOT exam may be granted "provisional practice certificate" to allow them to practise under the supervision of a practising OT, until first available exam	Once a completed application has been submitted, it takes COTO up to 30 days to process- usually takes 7 days
7. College of Pharmacists of British Columbia (CPBC)	-CPBC pre-registration: takes up to 20 days to process application -Pharmacy Examining Board of Canada (PEBC) Document Evaluation takes up to 8 wks once complete -Evaluating exam is offered 2 times per year -Results are sent 3 wks after exam	N/A	-CPBC Structured Practical Training (min 500 hours/3mths for applicants educated outside Canada/US -PEBC exam offered twice/year -Results are mailed 6-7 weeks following the exam -Feedback results for unsuccessful candidates mailed in 8 weeks	-Candidates must pre-register as an applicant with CPBC once have completed PEBC evaluating exam in order to do CPBC Structured Practical Training	-Details re registration timelines not available on websites
8. College of Pharmacists of Alberta (CPA)	-Registration on CPA provisional register -PEBC document evaluation and evaluating exam process same as described for CPBC	N/A	- CPA Structured Practical Training (min 1000 hours for applicants educated outside Canada/US -PEBC exam process same as described for CPBC	-Candidates must register on CPA provisional register once they have completed PEBC evaluating exam to do CPA Structured Practical Training	- Details re registration timelines not available on websites
9. Federation of State Boards of Physical Therapy (FSBPT) – United States	-Credentialing is done by individual state licensing authorities	N/A	-FSBPT exams are offered in 300 Prometric sites on times of candidates choosing -Exam results are sent to licensing authority	N/A	-Registration is done by individual state licensing authorities

Registration Steps/ Organization	Credential Review	Prior Learning Assessment (PLA) Programs	Examination	Application for Provisional Practice Certificate	Application for Practice Certificate
10. Health Professions Council (HPCUK) - United Kingdom (Includes Physiotherapy)	-Credentialing done by HPC -Initial assessment may take up to 16 weeks	N/A	-No exam	N/A	-See credentials review
11. Australian Physiotherapy Council (APC)	-Initial Assessment by the Australia Physiotherapy Council takes up to 6 wks from when all documents received	N/A	-Two types of examinations required: >Written: Held twice/year in 18 cities both in Australia and abroad. Results are issued 45 days after the exam >Clinical: Candidates are offered a number of sessions at different times throughout the year, dependant on when they submit their application and the availability of test venues. Examination venues are available in four locations. Results are issued 28 days after the exam	N/A	Details re registration timelines not available

Appendix I: Summary of Appeal Mechanisms for Comparable Regulatory Bodies National and International³⁰

Organization	Credential Review	Examination	Application for Independent Practice Certificate
1. College of Medical Laboratory Technologists of Ontario (CMLTO)	-May submit additional documentation for Prior Learning Assessment (PLA) to Canadian Society for Medical Laboratory Science (CSMLS) (Fee: \$100) -May appeal decision of CSMLS (Fee: \$100)	-Candidates may request manual remarking if request made within 60 days after CSMLS exam (Fee: \$100)	-If unsuccessful referred for internal review by CMLTO Reg. Committee -Decision mailed within 4 wks of meeting -Appeals are conducted by Health Professions Appeal and Review Board (HPARB)
2. College of Medical Radiation Technologists of Ontario (CMRTO)	-Application reviewed by CMRTO Reg. Committee -If refused, have 30 days to submit additional info -If refused, can contact HPARB to appeal the decision within 30 days	-Candidates may request to have their Canadian Association of Medical Radiation Technology (CAMRT) exam manually remarked if request made within 90 days -Response sent within 15-20 working days of receipt of request	-Once all requirements met CMRTO registers candidate applicant -If refused, can contact HPARB to appeal the decision within 30 days
3. Royal College of Dental Surgeons of Ontario (RCDSO)	-Can request National Dental Examining Board (NDEB) manually re-score either knowledge or clinical judgment assessments -Must submit request in writing within 3 months of the release of results (Fees: \$150/\$300) -May also make written submission to change results of clinical skills assessment within 3 months (Fee: \$500)	-Can request NDEB manually re-score written exam or OSCE with written request within 3 months of release of results and payment of fees (Fee: \$150)	-If application is referred to RCDSO Registration. Committee, additional info may be requested -Appeals can be made to the HPARB within 30 days
4. College of Massage Therapists of Ontario (CMTO)	-Credentialing assessments are conducted by educators: results are final and cannot be appealed	-May appeal within 7 days of delivery of CMTO exam results for extraordinary circumstances (Fee: \$100)	-An applicant may send any additional documentation to the CMTO Registration Committee for an appeal or review.

³⁰ Note: The timelines and processes indicated are based on the application of an internationally educated health professional. The information provided reflects what was available from respective websites and varies somewhat between organizations.

Organization	Credential Review	Examination	Application for Independent Practice Certificate
5. College of Dental Hygienists of Ontario (CDHO)	<ul style="list-style-type: none"> -National Dental Hygiene Certification Board (NDHCB) conducts assessment to determine eligibility to write exam -If not deemed eligible to take NDHCB exam, can request that application be referred to CDHO Registration Committee for review. -If refused have 30 days to submit additional info -If still refused, can contact HPARB to appeal the decision within 30 days 	<ul style="list-style-type: none"> NDHCB exam: -Manual rescoring is available for unsuccessful candidates – application must be made within 45 days of receipt of results (Fee: \$85) -May also request formal review -Can finally appeal to Board of NDHCB (Fee: \$100). -CDHO Exam: Applicant has 30 days to appeal the results of clinical competency evaluation. Decision provided within 45 days of the appeal (Fee: \$100) 	<ul style="list-style-type: none"> -Appeals can be made to the HPARB -Application reviewed by CDHO Registration Committee. If refused, have 30 days to submit additional info -Appeals can be made to the HPARB
6. College of Occupational Therapists of Ontario (COTO)	<ul style="list-style-type: none"> -Applicants who do not meet registration requirements may submit additional documents to the COTO Registration Committee -Appeals can be make to HPARB 	<ul style="list-style-type: none"> -Canadian Association of Occupational Therapy (CAOT) exam results are final -Unsuccessful papers are re-scored by hand before results are sent -May petition based on extraordinary circumstances but must send in writing within 7 days for admin issues; 14 days for ill health (Fee: \$50) 	<ul style="list-style-type: none"> -Applicants who do not meet registration requirements may submit additional documents to the COTO Registration Committee -Appeals can be make to HPARB
7. College of Pharmacists of British Columbia (CPBC)	<ul style="list-style-type: none"> -Pharmacy Examining Board of Canada (PEBC) evaluating exam: may request final hand-scoring if requested within 60 days of release of results (Fee: \$75) 	<ul style="list-style-type: none"> -PEBC Qualifying Exam: may request final hand-scoring of either exam if requested within 60 days of release of results (Fee: Written \$75; OSCE: \$150) 	<ul style="list-style-type: none"> -Info re appeals not available
8. College of Pharmacists of Alberta (CPA)	<ul style="list-style-type: none"> -PEBC process same as BC 	<ul style="list-style-type: none"> -PEBC process same as BC 	<ul style="list-style-type: none"> -Info re appeals not available

Organization	Credential Review	Examination	Application for Independent Practice Certificate
9. Federation of State Boards of Physical Therapy (FSBPT) – United States	-Credentialing is done by individual state licensing authorities	-Appeals may be made in writing within 60 days of exam -Replies by FSBPT within 60 days	-Appeals made to individual state licensing authorities
10. Health Professions Council (HPCUK) - United Kingdom (Includes Physiotherapy)	-May appeal HPC decisions in writing within 28 days of date rejection letter sent -May request appeal involving document review or a hearing	- No exam	-See appeals for Credential Review
11. Australian Physiotherapy Council (APC)	-May request a review of the Australia Physiotherapy Council assessor's evaluation with request in writing sent within 20 working days of receipt of assessor's evaluation	-Info re appeals not available	-Info re appeals not available