CredentiaLLing Policies

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2.1 Credentialling Standards

Date Approved: November 30, 2012
Date Effective: February 25, 2013
Date Revised: May 9, 2013

Scope
This policy applies to all internationally-educated physiotherapists applying to the Alliance’s credentialling process.

Principles
This policy has been designed in accordance with the Pan-Canadian Framework for the Assessment and Recognition of Foreign Qualifications principles of fairness, transparency, timeliness, and consistency, and in consideration of the minimum required standards of physiotherapy programs offered in Canada.

Purpose
The credentialling process involves comparing an internationally educated physiotherapist’s education and credentials to that of a Canadian-educated physiotherapist in order to determine if there are substantial differences in the qualifications that would prevent the internationally educated physiotherapist from being eligible for the Physiotherapy Competency Examination (PCE).

Policy
In order to determine if an internationally-educated physiotherapist's training is substantially equivalent to that offered in Canada, the following five criteria must be met:

Criterion 1: Verification of identity through authentic and valid documentation
Identity shall be checked and verified in accordance with the guidelines specified in the Credentialling Application Process Guide. If identity documentation or any other documentation is found to be irregular or fraudulent, the credentialling application shall be closed in keeping with Alliance Policy 2.3 Fraudulent/Irregular Documents and Cheating.

Criterion 2: Completion of a university level, entry-to-practice degree in physiotherapy
Completion of a university level, entry-to-practice degree (or credential by another name) in physiotherapy, awarded by a recognized institution authorized to issue credentials equivalent to a degree in Canada is required. Diplomas awarded by a non-university institution may be accepted if assessed and determined to be equivalent to at least a Bachelor’s degree in Canada.

Criterion 3: Successful completion of a minimum of 1025 hours of supervised clinical education
As part of their university level, entry-to-practice degree in physiotherapy, credentialling applicants must have received at least 1025 hours of supervised clinical education, with at least 100 hours in musculoskeletal, 100 hours in neurological and at least 40 hours in cardiorespiratory conditions. This is sometimes called supervised clinical practice, or clinical internship, or clinical placement or practicum.
The number of hours (1025) is the minimum standard for Canadian physiotherapy programs as set by Physiotherapy Education Accreditation Canada.

**Criterion 4: Fluency in English or French**
The Alliance requires that most internationally-trained physiotherapy students undergo mandatory language testing from one of the Alliance’s approved testing organizations. Applicants who have completed their physiotherapy education in certain countries are exempt from language testing. Please see Policy 2.2 Language Proficiency for details.

**Criterion 5: Knowledge of the practice of physiotherapy within the Canadian healthcare system**
The Alliance requires that all applicants to the credentialling process take a course in the ‘Context of Physiotherapy Practice in Canada’. This course must include a formal method of assessment that tests students on the course content. Information on Context of Physiotherapy Practice in Canada courses will be sent to the Applicant after the applicant’s credentialling application has been processed.
2.2 Language Proficiency Policy

**Date Approved:** September 14, 2012  
**Date Effective:** April 4, 2013  
**Date Revised:** December 13, 2018

**Scope**  
This policy applies to all internationally-educated physiotherapists applying to the Canadian Alliance of Physiotherapy Regulator’s credentialling process.

**Principles**  
As part of CAPR’s obligation to maintain high standards of quality and safety in physiotherapy practice, all internationally-trained physiotherapists must demonstrate proficiency in English or French as part of the credentialling process. This will ensure that physiotherapists licenced by CAPR’s members will have the language skills necessary to conduct their practice safely and effectively.

**Purpose**  
To clarify the language standards required by CAPR to demonstrate minimum language proficiency.

CAPR encourages all applicants to check with their regional regulatory organization as each organization may have different language requirements.

**Policy**

1) To become licensed or registered, an applicant must be fluent in either English or French. If they completed their entry-to-practice physiotherapy education (both classroom and clinical portions) in Australia, United States of America, New Zealand, Republic of Ireland, South Africa, United Kingdom or France they do not need to complete a language proficiency test. If they completed their entire primary and secondary school education in Canada, they do not need to complete a language proficiency test.

2) Applicants from other international jurisdictions must complete all four components (writing, speaking, listening and reading) of one of the following language proficiency tests:

Written evidence of completion of Test of English as a Foreign Language (TOEFL) based on the minimum scores in the following table.
Minimum Required Scores:

<table>
<thead>
<tr>
<th>TOEFL Component - Internet-Based Test (iBT)</th>
<th>Minimum Score</th>
</tr>
</thead>
<tbody>
<tr>
<td>Listening</td>
<td>21</td>
</tr>
<tr>
<td>Structure/Writing</td>
<td>21</td>
</tr>
<tr>
<td>Reading</td>
<td>21</td>
</tr>
<tr>
<td>Speaking Test</td>
<td>21</td>
</tr>
<tr>
<td>Overall Score (not cumulative)</td>
<td>92</td>
</tr>
</tbody>
</table>

OR

An average score on the CanTEST (standardized English proficiency test administered by University of Ottawa in Canada) of at least 4, with no component lower than 4, plus an oral interview rating of at least 4.5.

OR

An overall score of at least 7 on the Academic International English Language Testing System (IELTS). The test must include all components: Listening, Reading, Writing and Speaking.

OR

An average score on the TESTcan (standardized French proficiency test administered by University of Ottawa in Canada) of at least 4, with no component lower than 4, plus an oral interview rating of at least 4.5.

3) All scores, total scores and component scores, must meet minimum requirements in one sitting. Scores from multiples sittings cannot be combined to meet the language requirement.

4) The language testing agency must submit the official language scores directly to CAPR within two years of the test date. If CAPR receives an official language test result before an application, the test results must still be valid (i.e. less than two years old) at the time the application is received.

5) CAPR can begin credentialling assessments before receiving proof of language proficiency in English or French, but cannot complete the assessment or distribute the Final Results Letter until proof of language proficiency has been provided.
2.3 Fraudulent/Irregular Documents and Cheating

Date Effective: February 25, 2013

Scope
This policy applies to all internationally-educated physiotherapists applying to the Alliance’s credentialling process.

Principles
This policy has been designed in accordance with the Pan-Canadian Framework for the Assessment and Recognition of Foreign Qualifications principles of fairness, transparency, timeliness, and consistency, and in consideration of the Alliance core values of protecting the public interest.

Purpose
To promote safety and quality of physiotherapy in Canada, all documents and test results submitted to the Alliance as part of the credentialling process will be checked to confirm that they are valid and authentic.

Policy
All documents and test results submitted to the credentialling process by an applicant or on his or her behalf will be examined by a credentialling officer to confirm that they are authentic.

Fraudulent/Irregular Documents or Cheating
If a credentialling officer has reason to believe that documents or results are forged, fraudulent, altered, irregular, or involved cheating, then the Alliance shall investigate. The applicant will be contacted to verify the information. If the applicant cannot provide a satisfactory explanation, the file will be closed. All documents received become the property of the Alliance, and the Alliance will notify the applicants or their representative and the credentialling agencies the Alliance is partnered with. The Alliance also reserves the right to inform its member Canadian regulators and the educational institution that supposedly issued the credentials.

If an application has been closed due to the finding of an irregular document or cheating, then the applicant is allowed to appeal the finding through the Administrative Reconsideration/Appeals process. Individual credentialling officers will be able to give instructions should applicants choose to apply for administrative consideration or appeal.

Degree Mills or Diploma Mills
The Alliance does not accept physiotherapy credentials from ‘degree mills’ or ‘diploma mills’. Degree mills use names of non-existent universities, or establish a university without proper authorization, to sell documents that are not backed by appropriate study or examinations, and diploma mills sell
documents not backed by appropriate study or examinations and operate without the supervision of a state or professional agency. Applicants found to possess physiotherapy credentials from such institutions will be subject to the penalties above.

If an applicant is found to have cheated or committed fraud in a way that does not impact the documents needed for credentialling, the Alliance will continue the document assessment but will still notify its partners as stated above.
2.4 Notarized Copies

Date Effective: February 25, 2013

Scope
This policy applies to all internationally-educated physiotherapists applying to the Alliance’s credentialling process.

Principles
The credentialling process requires the submission of authentic diplomas, degrees or certificates in order to ensure only qualified individuals are deemed eligible to attempt the physiotherapy competency examination. Although original documents are least alterable, the acceptance of these documents can reduce the efficiency of the credentialling process.

Purpose
Issues with storage, security, potential damage to, and the return of original documents result in less efficient processing of applications. The purpose of this policy is to outline acceptable document authentication methods for copies in place of original documents.

Policy
The Alliance does not accept original documents. All documents sent into the Alliance, unless otherwise noted, must be notarized copies of original documents that have been made by a notary public. A notary public is an official who is authorized by the government to certify that copied documents are true copies of the original by applying his or her official signature and seal. A notary public will normally hold the specific title of notary public.

Notary Public is a specialized role that is recognized internationally. The following are NOT EQUIVALENT to a notary public:

- Justices of the Peace
- Commissioners of Oaths
- Commissioners of Declarations
- Embassy Officials
- Pharmacists
- Police Officers

In order to be acceptable to the Alliance a notarized copy must include both the signature and seal of the notary public, along with information such as his or her address and phone number should the Alliance need to contact them.
Alternatives

In situations involving applicants from countries which lack a notary public, the Alliance will find an alternative method to verify copies of original documents, usually through having documents certified by the Canadian Embassy in that country. No applicant will be penalized for receiving their physiotherapy education in a country without a notary public.

The Alliance makes no guarantees concerning original documents it has received, and will consider applications that include original documents instead of notarized copies as ‘incomplete’.
2.5 Translated Documents

Date Effective: February 25, 2013

Scope
This policy applies to all internationally-educated physiotherapists applying to the Alliance’s credentialling process.

Principles
The Alliance receives documents and applications from all over the world. The credentialling process requires the submission of authentic and true translations into English or French in situations where the documents were not originally produced in either of these languages.

Purpose
As documents in languages other than English or French are often used to determine the competency and training of an internationally-educated physiotherapist, having authentic and dependable translations is necessary to ensure the correct information is considered.

Policy
There are three ways that translated documents can be submitted to the Alliance:

1. Applicants, or their representatives, can have the documents that would normally be acceptable to be received from the applicant (e.g. degree, identity documents) translated by a certified translator and then sent to the Alliance.

2. A university can forward documents translated by that university’s official translator, along with the documents in the original language, directly to the Alliance.

3. A university can forward un-translated documents, which will then be forwarded to the applicant to be translated by a certified translator and then sent directly to the Alliance.

The Alliance will not accept notarized copies of translations. All translations received by the Alliance must be originals.

Definitions
The Alliance will only accept translations performed by a certified translator, who are usually certified by a government organization, such as the Association of Translators and Interpreters of Ontario. For international translators, the Alliance standard is a translator who has been certified by a member organization of the International Federation of Translators.

In some countries a certified translator may be called an ‘official’ translator.

For further information, please refer to the Credentialling Application Process Guide.
2.6 Incomplete Applications

Date Effective: February 25, 2013

Scope
This policy applies to all internationally-educated physiotherapists applying to the Alliance’s credentialling process.

Principles
Complete documentation is required to assess credentials. Receiving multiple documents separately slows down the credentialling process for all applicants.

Purpose
All applications to the Alliance credentialling program must be full and complete, with all documents required to be submitted by the applicant included in the proper format.

Policy
To streamline the credentialling application process and improve overall response times, applications will not be processed by the Alliance until all materials are received. Credentialling applications must be accompanied by all supporting documentation required from the applicant in order to be accepted. This does not include documents sent to the Alliance directly from schools or language testing agencies. Incomplete applications will be returned to the applicant.
2.7 Graduation Verification

Date Effective: February 25, 2013

Scope
This policy applies to all internationally-educated physiotherapists applying to the Alliance’s credentialling process.

Principles
Applicants may have finished all degree requirements and thus be eligible to apply for the credential assessment but may not have the degree in their possession due to the timing of graduation ceremonies. Factors such as this, which are beyond the applicant’s control, should not create an unnecessary barrier to the applicant.

Purpose
The Alliance requires verification of an applicant’s graduation status prior to processing their application. This is normally provided through the receipt of a notarized copy and translation, where required, of the applicant’s degree; however it is possible for an applicant to apply for the credentialling process after he or she has graduated but before receiving a diploma or degree.

Policy
With the Graduation Verification Form or official letter, the Alliance may commence the credentialling assessment prior to receiving the final degree or diploma, but the assessment cannot be completed without the final degree or diploma. Assessment results letters cannot be released until the degree/diploma has been submitted, as the assessment is incomplete without this information.
2.8 Distance Learning

Date Effective: February 25, 2013  
Date Revised: May 8, 2014

Scope
This policy applies to all internationally-educated physiotherapists applying to the Alliance’s credentialling process.

Principles
The nature of the profession of physiotherapy requires that physiotherapists gain both clinical and theoretical knowledge and the ability to apply practical skills in the treatment of the patient.

Purpose
Distributed education and distance learning are becoming more common with advancing technology. This policy sets out the position of the Alliance with respect to the use of these approaches in physiotherapy education programs.

Definitions
Distributed education is a broad concept that encapsulates all attempts to move education partway or completely away from the standard concept of a centralized campus. This includes methods such as virtual classrooms or setting up off-site classes.

Distance learning is a subset of distributed education that refers to information-technology assisted learning that occurs between professors and students who are separated by time or space.

Background
Distributed education can make education more accessible, and has been used successfully within Canadian physiotherapy training programs; Physiotherapy Education Accreditation Canada has released a set of standards and guidelines dealing with distributed and distance learning. The most important of these is the principle of substantive equivalency, which states that even though there are unavoidable differences between traditional and distributed (including distance) learning, tools must be developed to ensure that students are evaluated equally. While this is possible with theoretical material it would be very difficult for courses that teach clinical material through hands-on experience, and The Alliance has not yet been presented with an example of it being done successfully.

As clinical material is vital to the training of a physiotherapist, the Alliance has concluded that an acceptable entry-level physiotherapy program cannot be taught entirely by distance learning methods.
Policy

It is the position of the Alliance that an entry-to-practice physiotherapy degree cannot be entirely taught by distance learning. Courses in physiotherapy clinical practice must have onsite, in person laboratory components with the presence of an instructor. Additionally, clinical supervised practice placements or practicums must be delivered onsite with direct supervision.

Where an applicant has a recognized entry-to-practice level degree/diploma in physiotherapy, upgrading courses such as bridging or degree completion courses may be accepted if delivered by distance learning where these courses are not clinical practice courses.

This policy is not meant to discourage physiotherapy training institutions from integrating distributed learning components into traditional physiotherapy programs, and should not be interpreted as a stance against distributed learning itself.
2.9 Expiration of Credentialling Results

**Date Effective:** February 25, 2013

**Scope**
This policy applies to all internationally-educated physiotherapists applying to the Alliance’s credentialling process.

**Principles**
The nature of the profession of physiotherapy requires that internationally educated physiotherapists maintain the currency of their skills and knowledge. The time a physiotherapist spends out of practice must be also be minimized to ensure a greater chance of success on the PCE and in the profession.

**Purpose**
It is important that an applicant attempt the exam as soon as possible after they successfully finish the credentialling process. This helps to ensure that an applicant’s skills and the Alliance’s assessment remain current.

**Policy**
The results of a credentialling assessment remain valid for a period of two years. A credentialling applicant must address any outstanding issues and attempt the Physiotherapy Competency Examination (PCE) within two years of receiving a credentialling results letter. If an applicant fails to complete their first attempt of the written component of the PCE within this period, their file will be closed.

There are certain cases in which an applicant may be unable to attempt the exam within the two year period, such as financial inability to pay for the exam, or the inability to obtain a visa to come to Canada within the stated time period. Such applicants who have had the validity of their results expire will be required to apply for a New File Review in order to re-assess their eligibility to attempt the exam. A fee shall be charged for a New File Review and the file will be assessed using the most current standards in place at the time of the New File Review. Due to changing standards, there is no guarantee that the applicant will continue to be eligible as a result of the New File Review.
2.10 Supervised Clinical Practice Hours

Date Approved: May 9, 2013
Date Effective: May 9, 2013
Date Revised: February 24, 2020

Scope
This policy applies to all internationally-educated physiotherapists applying to CAPR’s credentialling process.

Principles
Minimum requirements for supervised clinical practice hours are necessary to ensure that clinical practical skills were attained and evaluated and represent the skills expected of a university-trained graduate across the scope of practice present in the Canadian healthcare system.

Purpose
To provide clarity regarding the minimum requirements an applicant must have with respect to supervised clinical practice hours.

Definition
Supervised clinical practice consists of supervised and evaluated experience as a physiotherapist-in-training within an entry to practice program, where the student gains practical experience and engages in a range of professional opportunities in various settings, for the purpose of learning and applying physiotherapy knowledge, skills, behaviours and clinical reasoning. Supervised clinical practice does not include academic classroom hours or practice on other students or staff. (Adapted from the 2011 Clinical Education Guidelines for Canadian University Programs.)

Policy
An applicant’s entry to practice, university level physiotherapy degree must have a component of supervised physiotherapy clinical practice that consists of:

- A minimum of 1025 hours supervised clinical education in total, with
- A minimum of 100 hours in musculoskeletal, 100 hours in neurological and 40 hours in cardiorespiratory conditions.

The applicant must have successfully completed the minimum number of hours outlined above.

Where an applicant has an entry-to-practice, university level degree in physiotherapy, the successfully completed supervised clinical practice hours may be accepted from the following sources:

- The entry-to-practice, university level degree in physiotherapy from a recognized/accredited university;
• A college program in physiotherapy, whether recognized/accredited or not, but where the hours have been explicitly accepted as transfer credit by the recognized/accredited entry-to-practice, university level degree program in physiotherapy;
• A non-entry-to-practice Master’s degree in physiotherapy from a recognized/accredited university.

Where an applicant does not meet the required hours of supervised clinical practice, they may be eligible to address these gaps by having worked hours as a physiotherapist recognized as prior learning when the applicant has successfully completed:

• A minimum of 820 hours of supervised clinical education in total, and
• A minimum of 80 hours in musculoskeletal, 80 hours in neurological and 40 hours in cardiorespiratory conditions.
2.11 Administrative Reconsideration Policy for Credentialling

Date Approved: April 20, 2005
Date Effective: April 20, 2005
Date Revised: December 10, 2019

Scope
This policy applies to all internationally-educated physiotherapists (applicants) whose credentials have been deemed to be substantially different from those of a Canadian-educated physiotherapist by The Canadian Alliance of Physiotherapy Regulators (CAPR).

Principles
This policy has been developed in accordance with provincial fair access and registration legislation.

Definitions
“Administrative reasons” are errors or omissions that deviate significantly from CAPR’s credentialling standards or procedures that negatively impact the applicant’s credentialling outcome.

Purpose
The purpose of this policy is to outline the Administrative Reconsideration standards and the process that may be initiated by applicants whose credentials have been deemed to be substantially different from those of a Canadian-educated physiotherapist by CAPR.

Policy
In some exceptional cases, CAPR’s credentialling assessment may determine that an applicant’s education does not meet the credentialling standards in place at the time of their assessment. In such cases, applicants may apply for an Administrative Reconsideration.

Applicants may apply for an Administrative Reconsideration of their credentialling assessment result in the following circumstances:
- Where the applicant believes that there were administrative reasons that affected the processing of their assessment; or
- Where the applicant believes that there was a lack of due process; or
- Where the applicant believes that their credentials have been evaluated incorrectly, such that a wrong decision has been made.

All requests for Administrative Reconsideration shall be set out in writing, detailing the reason(s) for the request and all particulars necessary to allow the Administrative Reconsideration to be adjudicated. Requests for Administrative Reconsideration must be received in CAPR’s office within 30 calendar days of the date of the applicant’s final assessment decision.
Applicants should submit any additional information that they deem relevant to their Administrative Reconsideration.

- Additional information must be provided directly to CAPR from the issuing institution, where applicable;
- *Information regarding financial status and letters of reference will not be considered as part of the Administrative Reconsideration process.*

Upon receipt of the relevant documents and associated fee, CAPR will appoint a Credentialling Officer to conduct an internal review of the documents and any other information deemed relevant. The Credentialling Officer who made the final assessment decision shall not conduct the Administrative Reconsideration review. A letter outlining the rationale for the decision, and the associated outcome(s), will be issued to the applicant by the National Director of Evaluation Services.

Potential Outcomes:

- The application for Administrative Reconsideration is granted. If this is the case, the following will occur:
  - If the source of the Administrative Reconsideration was due to administrative issues as defined by CAPR, the associated fees of the application for Administrative Reconsideration will be refunded to the applicant.

- The application for Administrative Reconsideration is denied. If this is the case, the applicant may apply for an Appeal of their Administrative Reconsidering outcome (see Appeal Policy for Credentialling).
2.12 Appeal Policy for Credentialling

Date Approved: April 20, 2005
Date Effective: April 20, 2005
Date Revised: December 10, 2019

Scope
This policy applies to all internationally-educated physiotherapists (applicants) who are not satisfied with the outcome of their Administrative Reconsideration.

Principles
This policy has been developed in accordance with provincial fair access and registration legislation.

Definitions
“Appeals Resource Group” is a pool of individuals appointed by the Evaluation Services Committee of the Canadian Alliance of Physiotherapy Regulators (CAPR) to provide membership to an Appeal Panel that reviews Appeals of Credentialling and Examination Administrative Reconsideration decisions.

“Appeal Panel” is the panel appointed from the Appeals Resource Group to review a particular appeal. The Chief Executive Officer of CAPR facilitates this review but is not a member of an Appeal Panel. From time to time, an Appeal Panel may be augmented by external experts when further expertise is required.

Purpose
The purpose of this policy is to outline the Appeal standards and the process that may be initiated by applicants who are not satisfied with the outcome of their Administrative Reconsideration.

Policy
If an applicant is not satisfied with the outcome of their Administrative Reconsideration, they may Appeal.

All requests for Appeal shall be set out in writing, detailing the reason(s) for the request and all particulars necessary to allow the Appeal to be adjudicated. Requests for Appeal must be received in CAPR’s office within 30 calendar days of the date of the Administrative Reconsideration decision.

Applicants should submit any additional information that they deem relevant to their Appeal.
- Additional information must be provided directly to CAPR from the issuing institution, where applicable;
- Information regarding financial status and letters of reference will not be considered as part of the Appeal process.

CAPR Appeal hearings are generally in writing only; however, applicants may request an opportunity to make an oral presentation to the Appeal Panel. Applicants requesting to make an oral presentation must make this request at the same time as written documents are submitted outlining why the request is
necessary. The Appeal Panel will consider this request and determine whether an oral presentation is warranted. All oral submissions are made to the Appeal Panel via teleconference during the Appeal Panel meeting; the onus is on the applicant to make themselves available at this time.

Upon receipt of the relevant documents and associated fee, the Appeal process will be initiated. An Appeal Panel will review the original documents, the Administrative Reconsideration decision, and any additional information provided by the applicant and/or CAPR staff. The Appeal Panel will determine whether the outcome of the Administrative Reconsideration was reasonable given the available evidence.

A written Appeal report, documenting the Appeal Panel decision and signed by the Chief Executive Officer, shall be provided to the applicant. The report will include the outcome of the Appeal and reasons for the decision.

Potential Outcomes:

- The application for Appeal is granted. If this is the case, the following may occur:
  - An applicant’s credentials and qualifications could be deemed not substantially different to that of a Canadian-educated physiotherapist.
  - If the source of the Administrative Reconsideration was due to administrative issues as defined by CAPR, the associated fees of the applications for Appeal and Administrative Reconsideration will be refunded.
- The application for Appeal is denied.

An Appeal is the final level of review; as such, the decision of the Appeal Panel shall be final and binding upon the Applicant.