



CAPR
Canadian Alliance
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Regulators

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Alliance canadienne des
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de la physiothérapie

Amanda de Chastelain
President, CPA Board of Directors
Canadian Physiotherapy Association

and

Viivi Riis
Past-President, CPA Board of Directors
Canadian Physiotherapy Association

July 9, 2021

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

Dear Ms de Chastelain and Ms Riis,

Thank you very much for your kind words with respect to my new role as President of the CAPR Board of Directors. We look forward to continue to work with CPA and all our partners to find solutions of the existing challenges brought up by COVID-19.

In your letter, you raise some very good points. Let's address some of them. Our response is provided on behalf of the CAPR, not individual regulators.

You request assurances from the members of the CAPR Board that they will return to their respective Councils and Registration Committees to request consideration, should the CAPR exam not proceed as planned, to find an alternative, national and unified measure to enable candidates to prove their competence to achieve entry to practice licensure by the end of 2021. We don't see any problem with that request although the feasibility of a unified measure is complicated by different regulations in each jurisdiction. For example, some jurisdictions explicitly name the Physiotherapy Competency Exam (PCE) in their regulations or bylaws, while others do not. Similarly, the position of various provincial governments related to licensure exams and professional regulation varies considerably from province to province. To assist in your discussions, we have provided an update on the current status of each jurisdiction's discussions related to the PCE (see attachment 1). We also need to emphasize that the CAPR Board has no jurisdiction or authority over any Regulatory College or their Councils. As such providing "assurances" will not be possible. What we can commit to is ongoing conversations and transparency in our work.

You also ask "*CAPR to immediately return all fees collected from candidates who are waiting on the clinical component of the PCE.*" We fully support this decision and have since the EMS exam was cancelled. All candidates who experienced disruption to their lives as a result of the



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sudden cancellation of the March 2020 clinical exam, received a refund – either by direct credit to their credit card, wire transfer, or check. The vast majority of candidates have accepted the refunds. All other candidates are able to request a refund from CAPR if they wish. These refund requests are processed promptly.

You propose the provincial Regulators (Colleges) to suspend the requirement for a completion of the clinical component of the PCE to be eligible for licensure in every province. It is simply not possible without a legislative or regulatory framework modification in different jurisdictions. Also, it is important to fulfil our role in public protection and labor mobility, hence the necessity of a PCE.

You are also considering if a possible CAPR Relaunch Project fails, an alternative process is necessary so candidates are not further impeded from being licensed as soon as possible. You are giving us the Medical Council of Canada (MCC) example who will no longer require the practical exam for Medical Residents moving forward. Why can't this be done for physiotherapy? The answer is because medical training differs significantly from physiotherapy training. The Medical Council of Canada has an accepted and established minimum 12 month post graduate medical training requirement that must be completed in order to get the LMCC. Further, the post-graduate training period undertaken after the MCC exams (medical residency) includes very close daily practice supervision and is followed by a certification exam by the Royal College of Physicians and Surgeons of Canada or the Canadian College of Family Physicians. Postgraduate medical training under supervision lasts a minimum of 2 years for family medicine and up to 8 years for select specialties. The average length of time in supervised residency is five years. These additional training requirements allow the MCC more flexibility in cancelling the practical exam while considering other options. Physiotherapy does not have a mandatory standardized post graduate training requirement. Physiotherapy does have mentorship; however, this is very different from the post graduate training requirements of the MCC. Mentorship is non-standardized and therefore subjective. Mentorship was set up to develop a mentoring and learning relationship for entering into practice. It is not a validated evaluation tool but rather an indicator of areas to further develop. Not all provinces have it and it is different from province to province.

What do we propose? Our go-forward plan includes the following:

1. The exam process will start September 8th:
<https://www.alliancept.org/announcement/clinical-component-update-week-of-june-28/>.
2. In the meantime, Colleges are exploring alternatives should the CAPR exam not proceed as planned. It is important to acknowledge that 3 Colleges found a temporary solution already for the March exam cohorts (BC, AB, QC).
3. Over the summer, the CAPR Board will launch the innovation committee which will begin to consider long-term what the best new approach to competency assessment might be.
4. In September (at the latest), the CAPR Board will confirm plans regarding exam alternatives should the Qpercom platform not work (for example, Zoom-based exams).



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The role of CPA:

In the interest of moving forward together in a unified way that supports the best interest of the profession, we ask the following from the CPA:

1. Ongoing assistance in matching candidates in need of a quiet exam space with available clinics or offices;
2. Assistance with the recruitment of examiners;
3. Assistance in using CPA communication channels to correct ongoing misperceptions about the clinical exam. The more consistent factual information is available to candidates about the exam, the less anxious candidates and employers will be.
4. Where appropriate, a strong advocacy role with local governments, in collaboration with the regulatory College, regarding regulatory or by-law changes.
5. Messaging regarding increased professionalism and respect by all physiotherapists during challenging times.

Sincerely,

Denis Pelletier,
President

Katya Masnyk
CEO



Attachment 1: Summary of current regulatory College context with regards to exams

Province	Current status	Comments
Yukon	<p>Regulatory structure is embedded within Territorial government. It is not possible to change things for just one profession.</p> <p>Waiting for CAPR exam.</p>	<p>Only 1 candidate has been affected by the changes in the clinical exam. They are scheduled for the first window in September 2021.</p>
British Columbia	<p>Has received Ministry approval for a by-law change allowing alternative exams under exceptional circumstances.</p> <p>Has offered an alternative University of British Columbia exam to candidates registered for the cancelled March 2021 exam. All other candidates to be scheduled in the CAPR exam starting in September. In case of additional exam failures or significant interruptions, CPTBC will consult with UBC for additional local exam.</p>	<p>75 candidates of 83 eligible completed the alternate exam.</p>
Alberta	<p>Ability to launch an alternative exam is allowed through Council policy. No by-law or regulation changes required.</p> <p>Has offered an alternative University of Alberta exam to candidates that met eligibility criteria determined by Council. All other candidates to be scheduled in the CAPR exam starting in September. In case of additional exam failures or significant interruptions, Physiotherapy Alberta will consult with U of A for additional local exams.</p>	<p>80 candidates out of an eligible 120 completed the alternative exam.</p>
Saskatchewan	<p>Has requested a by-law amendment from the Ministry of Health allowing for alternative exams. The by-law change has not yet been approved. The College has notified the membership that due to not having</p>	



	<p>the bylaw in place at this time, the College will not have time to implement an alternative solution prior to the September CAPR exams. The College is still hopeful that the bylaw amendment will pass to allow for a more nimble process should it ever be needed in the future.</p>	
Manitoba	<p>Changes to exam process require government support and regulation change.</p> <p>CPM is waiting for the CAPR exam. The Council is currently exploring alternative options in case of CAPR exam disruption.</p>	
Ontario	<p>An Entry to Practice working group has been appointed to review the recommendations coming out of the 2019 Entry to Practice scoping review report. The College supports using the CAPR exam for candidates however the working group will be exploring the opportunity to use an alternative exam should the CAPR exams not launch in September 2021. While Council has the ability through policy to approve the exams that are used as a part of the entry to practice process, the Regulation speaks to a 2 part exam, one part written and one part clinical. Changing the 2-part requirement would require government approval and a regulation change.</p>	
Quebec	<p>Ability to launch an alternative exam is allowed through policy. No by-law or regulation changes required.</p> <p>Has offered an alternative exam via the University of Sherbrooke to candidates registered for the cancelled March 2021 exam. All other candidates to be scheduled in</p>	<p>14 candidates successfully completed the Sherbrooke exam.</p> <p>Of the 14 candidates who passed the exam, some were scheduled for the June CAPR exam and were inadvertently</p>



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	the CAPR exam starting in September. In case of additional exam failures or significant interruptions, OPPQ will consult with Sherbrooke for additional local exam.	admitted to the exam by the OPPQ.
New Brunswick	Waiting for CAPR exam.	24 candidates are in the queue for the fall CAPR exams.
Nova Scotia	Nova Scotia College has the ability in legislation to use an alternate exam with no bylaw changes required. CPTNS has chosen to maintain a consistent national approach to evaluation, what ever that looks like. Support the use of the CAPR exam.	50 candidates are in queue for the fall CAPR exams.
Prince Edward Island	Waiting for CAPR exam.	9 candidates are in queue for the fall CAPR exams.
Newfoundland and Labrador	Waiting for CAPR exam. Has requested a by-law change from government to be able to exempt candidates from the exam requirement in case of further exam failures or significant interruptions.	19 candidates are in the queue for the fall CAPR exams.