

August 8, 2021

Attention:

Canadian Alliance of Physiotherapy Regulators (CAPR)

Board of Directors and Committees of The Board,

Canadian Provincial And Territorial Physiotherapy Regulators (Government of Yukon Consumer Services, College of Physical Therapists of British Columbia, Physiotherapy Alberta College & Association, Saskatchewan College of Physical Therapists, College of Physiotherapists of Manitoba, College of Physiotherapists of Ontario, Ordre Professionnel De La Physiothérapie Du Québec, College of Physiotherapists of New Brunswick/Collège Des Physiothérapeutes Du Nouveau-Brunswick, Nova Scotia College of Physiotherapists, Prince Edward Island College of Physiotherapists, Newfoundland & Labrador College of Physiotherapists)

We, the registered physiotherapists of Canada strongly request the Canadian Alliance of Physiotherapy Regulators (CAPR) and relevant regulatory colleges to permanently eliminate the planned virtual and in-person clinical component of the Physiotherapy Competency Examination (PCE) based on the following facts and the best available evidence:

Fact #1: Based on the latest systematic review (Bobos et al 2021), the clinical PCE lacks sufficient reliability and validity despite inaccurate claims on the CAPR website ^{1, 2}.

Fact #2: There is no evidence, after 25 years of requiring the clinical PCE, that the examination has increased public safety as stated on the CAPR website ^{1, 2}.

Fact #3: CAPR has fundamentally changed an already low reliability and invalid examination, by transitioning from in-person to virtual.³ We are very concerned what aspects of PT skills will be examined in the virtual OSCEs since the literature is very clear that many skills cannot be examined (e.g. Physical examination, safety/handling). If online OSCEs plan to assess clinical reasoning then this can be done through written exams.

Fact #4: The virtual PCE has never been evaluated to examine its validity and reliability for testing entry-to-practice standards. Testing the reliability and validity of a high-stakes examination such as the PCE should be a mandatory evaluation ⁴, as there are serious consequences to the professional and personal lives of those who may not successfully complete it.

Fact #5: The Medical Council of Canada (MCC) and the United States Medical Licensing Examination (USMLE) have eliminated the practical component of their medical licensing exams^{5, 6}. They state that public safety will not be affected by the elimination of the practical component of the examination.

Fact #6: Relevant allied health professions including, occupational therapists, athletic therapists, respiratory therapists, nurses, dentists and physicians do not require a “mock” clinical examination to assess graduates from an accredited university in Canada. Further, there is no published data, that these healthcare providers impose undue harm to the public, compared to registered physiotherapists who have completed the clinical PCE.

Fact #7: Registered physiotherapists in Quebec are not required to complete the clinical PCE ⁷. Furthermore, there is no evidence based on any published data that physiotherapists in Quebec are less competent or impose a greater threat to the public safety than those in other provinces and territories in Canada.

Fact #8: There is no published evidence that those who have successfully completed the PCE have greater competency or that they pose less of a public threat than the physiotherapists who never completed the PCE prior to its conception in 1994. The PCE has not stopped the fact that the most common issues that are filed/reported are billing, and sexual assault complaints. Not “they forgot to put the brakes on”.

Fact #9: Canada has the most expensive PT credentialing exam in the world at \$2815 ⁸ as compared to USA at \$485 ⁹, New Zealand at \$354 ¹⁰ and a practical component is not required in countries such as USA, UK, Australia, New Zealand and in fact not in any of the 17 countries with well-developed PT regulation systems ¹. Furthermore, there is no evidence that these jurisdictions produce less competent clinicians than Canadian physiotherapists who have completed the clinical PCE.

Fact #10: The CAPR has stated that the elimination of the practical component of the PCE is “*simply not possible without a legislative or regulatory framework modification in different jurisdictions.*”; ¹¹

However, in BC, the Ministry of Health and the College of Physical Therapists of British Columbia have already worked together to alter the regulatory framework (The Health Professions Act) so that interim physiotherapists are to obtain their licensure by completing an in-person clinical exam overseen by the University of British Columbia. This demonstrates that despite the CAPR’s resistance to change – change is possible, especially during these unprecedented times.

As registered physiotherapists across Canada we believe that the clinical PCE tests the ability to take tests, not the ability to practice physiotherapy. We need to envision new ways of assessing competency based on scientific evidence. We propose that the ideal way to evaluate competence is through experience and practical training, and validated evaluation in actual clinical settings. Furthermore, it is unclear how preparing for a clinical exam of low reliability, unproven validity, comprised of many archaic clinical concepts, and delivered under very stressful conditions prepares graduates for clinical practice, proves competency or achieves the regulator’s goal of protecting the public.

The physiotherapy profession and consumers of physiotherapy services would be better served by an apprenticeship model similar to that employed by occupational therapists ¹². Under this approach, physiotherapy graduates would be evaluated by experienced physiotherapists as they gained competency in entry-to-practice skills and were able to demonstrate their readiness to independently practice. The public would experience no difference in the quality of physiotherapy provided if the clinical PCE were eliminated today as the examination has not been evaluated for any real-world validity.

We, the practicing, registered physiotherapists of Canada request that the CAPR and various regulatory colleges work together with relevant governments to permanently eliminate the requirement of the clinical PCE for licensure. We propose that the best solution is that the clinical PCE be replaced with a validated clinical residency training program.

Finally, the CAPR Chief Executive Officer, President, and Vice-President are responsible for the failed administration of the clinical exam over the last 18 months and the significant delay to licensure of thousands of physiotherapists across Canada. These executives have lost the confidence of the registered physiotherapists of Canada. Furthermore, the executives are attempting to ignore and move past the debacle of the last 18 months by hosting a psychometrically untested clinical PCE exam. This situation is unacceptable, it does not protect the public, it lowers the reputation of the physiotherapy profession in the eyes of the public and our allied health colleagues.

It is well past time for CAPR to focus their energy and resources on getting our residents licensed immediately WITHOUT this exam. These residents have all successfully completed a written exam and several months of clinical internships. **We expect CAPR to present a solid plan by August 31, 2021 to assist with provincial legislative requirements to eliminate the need for this process during this global pandemic.**

References:

1. Bobos P, Poulipoulou DV, Harriss A, Sadi J, Rushton A, MacDermid JC. A systematic review and meta-analysis of measurement properties of objective structured clinical examinations used in physical therapy licensure and a structured review of licensure practices in countries with well-developed regulation systems. *PLoS One*. 2021;16(8):e0255696. Published 2021 Aug 3. [doi:10.1371/journal.pone.0255696](https://doi.org/10.1371/journal.pone.0255696)
2. [Dr. Alexandra Harriss letter to the CAPR & Colleges](#)
3. <https://www.alliancept.org/taking-the-exam/exam-application-information/exam-dates-fees-and-locations/>
4. Thorndike RM. Book Review : Psychometric Theory (3rd ed.) by Jum Nunnally and Ira Bernstein New York: McGraw-Hill, 1994, xxiv + 752 pp. *Appl Psychol Meas* 1995; 19: 303–305.
5. <https://www.cmaj.ca/content/193/26/E1014>
6. <https://www.aamc.org/news-insights/what-elimination-major-medical-licensing-exam-step-2-cs-means-students-and-schools>
7. <https://www.alliancept.org/licensure/licensure-in-quebec/>
8. <https://www.alliancept.org/taking-the-exam/exam-application-information/exam-dates-fees-and-locations/>
9. <https://www.fsbpt.org/Our-Services/Candidate-Services/Exam-Registration-Payment>
10. <https://www.physioboard.org.nz/i-want-to-be-registered/new-zealand>
11. <https://www.alliancept.org/wp-content/uploads/2021/07/Response-to-CPA-Letter-of-June-25.pdf>
12. <https://www.notce-ena.ca/information>

Sincerely,

The undersigned Registered Physiotherapists across Canada concerned for the future of public safety, the current physiotherapy residents and the physiotherapy profession.

We, the registered physiotherapists of Canada strongly request the Canadian Alliance of Physiotherapy Regulators (CAPR) and relevant regulatory colleges permanently eliminate the planned virtual and in-person clinical component of the Physiotherapy Competency Examination (PCE) **based on the above mentioned 10 facts and the best available evidence.**

It is well past time for CAPR to focus their energy and resources on getting our residents licensed immediately WITHOUT this exam. These residents have all successfully completed a written exam and several months of clinical internships. **We expect CAPR to present a solid plan by August 31, 2021 to assist with provincial legislative requirements to eliminate the need for this process during this global pandemic.**

Name of PT	Province	Position
Abdullah Oredgebe – PT Res.	SK	Self-employed
Adam Loewen	MB	St Boniface General Hospital
Adrienne Jordan	ON	Perth and Smiths Falls District Hospital
Alec Chisholm	AB	Alberta Health
Alex Procyk	ON	Total Physiotherapy
Alexandra de Vries	MB	Winnipeg Hospital
Alison Ribeiro	ON	West End Mamas
Allisyn Camche	SK	A.C. physiotherapy
Amanda Eagles	ON	Saugeen Physiotherapy
André Goyette	ON	CommuniCare therapy
Andre Levesque	NB	Charlotte County Hospital
Andre Riopel	ON	Back In Motion Physiotherapy
Andrea Bacik	ON	Athlete's Care
Andrew Ross	NB	Horizon Health Network
Anita Anne Hoelzel	NS	Atlantic Balance and Dizziness
Anker Gonsalves	ON	Healthmax Physiotherapy
Anna DiMarco	MB	Tuxedo Physiotherapy
Anna Papageorgiou	ON	Durham Orthopedic and Sports Clinic
Anna Tremblay	NB	Physiothérapie Anna Tremblay
Anne Marleau-Herst	ON	Health Sciences North
Anthony Abbado	ON	CBI Health
Ashley Kuntz	ON	TVCC
Aspen Haynes	AB	Panther Sports Medicine
Bahram Jam	ON	Founder & director of APTEI
Barbara Lacalamita	ON	Lacalamita Physiotherapy
Barbara Lazzari	NB	Hampton Physiotherapy
Barbara Lee	ON	Niagara Canine Conditioning Centre
Ben Bunin	NS	Nova Scotia Health Authority
Beth Pelletier	NB	WorkSafeNB
Boby Kurian Kurisummoottil Varughese	ON	South Bruce Grey Health
Bozena Bogaczewicz	ON	Trillium Health Partners
Bradley Jawl	BC	Tall Tree Health
Brandi Burton	MB	Prairie Mountain Health

Brent Pepper	ON	Woodstock General Hospital
Brett Thomas Willows	BC	Eclipse Physiotherapy
Brian Callender	BC	CBI Port Alberni
Brian T. McGrath	NB	Physiothérapie Bouctouche
Bryan A Rice	ON	Partners In Rehab
Calvin Bradley J Mills	NS	Pthealth Greenwood
Carole Chebaro	ON	Director: Neurocore Physiotherapy
Carolyn Crane	PE	Queen Elizabeth Hospital
Catharine Tombs	ON	Moving On After Stroke Program
Catherine Darling	ON	London Health Sciences
Catherine MacGillivray	BC	Cairn Physiotherapy
Cathy Roy	QC	Dawson College
Céline Clément	ON	Back in Motion Physiotherapy
Céline Razeau	ON	Back in Motion Cornwall
Chantal Gendron	QC	Base Militaire de Valcartier
Cheryl La Force	ON	Self-employed
Christine Spence	ON	Health Sciences North
Clare Faulkner	BC	Island Hand Therapy Clinic
Clarissa Beke	BC	Kelowna General Hospital
Colin Groeneveld	BC	University Hospital of Northern
Coral Koke	BC	Metrotown Orthopaedic and Sports
Cyrus James Kazemi	NS	Roseway Hospital
Daniel DeBruyne	ON	Hotel Dieu Shaver Rehab Hospital
Danny Dinh	QC	Expertise Physio
Daphne Jackson	ON	Mount Sinai Hospital
Darien Lazowski-Fraher	ON	Neuphysio Rehabilitation
Darryl Gjernes	BC	Village Physiotherapy
David Henschel	ON	Novo Peak Health
Dean Daly	AB	South Health Campus
Debbie Patterson	AB	PainSolutions Inc
Denise Mcleown	ON	Trillium Health Partners
Derek Northrup	NS	Nova Scotia Health
Dev Chengkalath	ON	Primal Human Performance
Diane Courtemanche	ON	Head, Neck and Jaw
Dianna Lueck	ON	On Mat leave
Dona Watts-Hutchings	MB	DWH Physical Therapy
Edward Zwingerman	MB	D'Arcy Bain Physiotherapy
Elaine Shaver	ON	Ottawa Physiotherapy
Elizabeth Diedericks	ON	CBI Health Group
Elizabeth Frey	BC	Richmond Hospital
Elizabeth Sutton	AB	Peak Physical Therapy
Emilie Noble	ON	PhysioNorth
Erica Dupuis	AB	Pembina Valley Physiotherapy
Erin Allison Powers	BC	Infinity Physio
Erin Collins	BC	Red Cedar Physiotherapy
Erin Swinton	AB	Equus physio
Ethan Hemeyer	AB	Parkland Rehab

Ezzat Nazzali	ON	Windsor regional hospital
Feng (Andy) Huo	ON	Hands of Care Physiotherapy
Filipina Mejia	ON	Pembroke Regional Hospital
Fred Samorodin	BC	Past CAPR clinical examiner
Galia Carranco Herrera	ON	Core Connections Physiotherapy
Gary Weare	BC	Interior Health at Penticton Regional Hospital
Gil Magne	MB	Precision Movement & Therapies
Gillian Horton	BC	Elk Valley Regional Hospital
Gita Mikal	ON	Physiomobility Health Group
Glen Young	MB	Glen Young Physiotherapy
Godfrey Kwan	AB	Chinook Regional Hospital
Haider Tirmizey	ON	Athletes Care
Hayden Atkinson	ON	London Health Sciences
Heather Beauchesne	SK	Saskatchewan Health Authority
Heather Duque	ON	Newcastle Physiotherapy
Helen M. Burger	BC	Island Hand Therapy Clinic
Henza Miller	ON	ATC
Iain Kemp	MB	Adhartas Physical Therapy
Irene Balutis	AB	
James McLean	ON	Quinte and District Rehabilitation
James Zhou	BC	Salius Rehab Inc
Janice Parrott	ON	Parrott Physio
Jason Gallant	ON	Trilogy Physiotherapy
Jaspreet Dhillon	BC	Synergy Rehabilitation
Jean Felix Daloze	ON	PhysioExtra.
Jeff Wright	ON	Wright Physiotherapy.
Jennifer Earnest	ON	Bayshore Physical Therapy
Jennifer Heath	ON	Heath Physiotherapy
Jennifer Kyere	ON	William Osler health
Jennifer Sullivan	NL	Labrador West Health Centre
Jillian Adams	ON	ActiveCARE Physio
Joanna Lau	ON	Bayview Rehabilitation
Joanne Grout	AB	Self-employed
JoAnne Moody	AB	Three Hills Health Centre
Joanne Olsen	ON	Ottawa Valley Physiotherapy
John Power	ON	West Parry Sound Health
Jonathan Bourgeois	NB	Moncton City Hospital
Jonathan Raies	ON	Windsor Regional Hospital
Jonathon Carkner	BC	Easy Allied Health
Jordan Oceau	QC	Concordia Physio Sport
Jordan Shannon	NB	Max Health institute
Jordyn Bain	MB	D'Arcy Bain Physiotherapy
Josh Bellingham	BC	Josh Bellingham Physiotherapy
Judith Mathieu	BC	Holy Family Hospital
Julian Roach	ON	Physelite
Julie Herrington,	ON	Arthritis Society
Justin Parsons	NB	WorkSafe New Brunswick

Karen Cornish	BC	Purcell Physiotherapy
Karen Treleven	ON	Self-employed
Kari Loftsgard	BC	Creekside Physiotherapy
Karla Andrews	ON	Andrews In-Home Physiotherapy
Kate Roddy	ON	Fixt Physio
Kathleen MacLennan	NB	Saint John Regional Hospital
Kayte-Lynn Kowal	ON	Total Physiotherapy
Kelly Barrie	AB	Fifth Ave Physiotherapy
Kelly Milan	MB	Corydon Physiotherapy
Kelly Spence	AB	Trackside Physical Therapy
Kelsey Schmidt – PT Res.	ON	Wright Physiotherapy
Kelsie Melissa McGee	AB	Chinook Primary Care Network
Keri-Lynn LeBlanc	NB	Max Moncton Physiotherapy
Kevin Penney	ON	Self-employed
Kiefer Theriault	NS	Valley Regional Hospital
Kody Watson- PT Res.	ON	Headwaters Physiotherapy
Krista McIntyre	ON	Lifemark Health Group
Kyla Jonah-Hourihan	NB	Hampton Physiotherapy
Lauren Ward	ON	St. Gaberiel's Villa
Laurie Edge-Hughes	AB	Two Hands Physiotherapy
Leann Boehm	SK	Southeast Physiotherapy
Len Kiroplis	ON	Queen West Physiotherapy
Leslie Balkwill	ON	The Ottawa Hospital
Leslie Tempest	ON	ProActive Rehab
Lia Smith	NB	Kenval Rehab
Linda Dyer-Macdonald	ON	Sport-Medic Physiotherapy
Linda McConnell	YK	Yellowknife Physio
Linnie Ewart	NS	Lifemark-Colchester
Lisa Archibald	BC	Kelowna general hospital
Lori Dalin	BC	Anson Orthopaedic Clinic
Louise Haley	ON	Breast Rehab
Lu Yao	BC	West 4th physiotherapy
Luka Senk	ON	Blue Mountain Physiotherapy
Lyne Denis	ON	Evolution Physiotherapy
Lynn Barton	BC	Pacific Rim Physiotherapy
Maciek Krolkowski	AB	Momentum Health
Maggie Bergeron	ON	Co-Founder of Embodia
Mahdi Hadidi	ON	Lakeridge Health
Manjit Kaur Mann	BC	VCH
Manvir Purewal	BC	Pure Life Physio
Marc Beland	AB	Northwest Health Centre
Marcelle Fujimak	ON	Self-employed
Margaret Wilding	ON	Neenah Navasero Neurorehabilitation
Maria Jonna Canet – PT Res.	ON	North Light Pain Clinic
Marina Fahmy	ON	Joseph Brant Hospital
Mark Anunciacion	ON	Sunnybrook Health Sciences Centr
Mark Crone	ON	Physiotherapy III

Mark Johnson	NB	CBI Health Moncton
Marla Balzer	BC	Ongomiizwin Therapy Services
Marni Pepper	ON	Oakridges Physiotherapy
Martin Marion	QC	Physio-Outaouais in Gatineau
Mary Bazzarelli	AB	Revive Whole Body Health
Mary Hopkins	AB	North Hill Physiotherapy
Marzana Bates	ON	Self-employed
Masoumeh Ghassemi	ON	Self-employed
Mat Mori	ON	Total Health Physio
Mathew Haines	BC	LabHealth Physiotherapy
Mathieu Allain	NB	Dr. Georges-L.-Dumont University
Matthew Nixon	NS	Choice Health Centre
Matthew Short	MB	Pure Lifestyle
Matthew Wright-Smith	BC	Healthx Physical Therapy
Maureen Bellavia	ON	Waterdown Physiotherapy Clinic
Melanie Klos	MB	Manitoba physio
Melissa Alterthum	BC	Lifemark and Achieve Health
Melissa Seifried	ON	Cornerstone Physiotherapy
Melissa Smith	MB	Pine Ridge Physical Therapy
Meredith Patterson	NB	Horizon Health in Waterville
Mhoraig Macfarlane	ON	Self-employed
Michael David Domes	BC	Community Hlth Svcs - Oceanside
Michael Penney	BC	CBI Heath group. Langford
Michael Yates	BC	Self-employed
Mireille Lacoursière	ON	Physiothérapie Plantagenet
Mohammed Khan	ON	Peterborough Physiotherapy
Mona Martin	QC	Université de Montréal
Murielle Fortin	ON	Physio Plantagenet
Myra Dwoskin	ON	Home Physiotherapy
Nadine Stunzi	BC	Self-employed
Nancy Drouillard	ON	Western Ontario Sports Injuries
Natalie St. Hilaire	ON	Hamilton Health Sciences
Navdeep Kaur Bajaj	ON	PhysioRehab Group
Neha Marepally	ON	Ottawa Physio
Nerissa D'Mello	ON	Halton Healthcare
Nicole Benjamin	ON	Athlete's Care
Nina Hovanec	ON	UHN: Toronto Rehab
Nolan Roesch	AB	St. Mary's Hospital
Omar El-Temtamy	NS	Classic Physiotherapy
Padmanee Koovarjee	ON	Self-employed
Paige Larson	BC	North Shore Sports Medicine
Pamela Honeyman	ON	Self-employed
Patrick Lalonde	ON	Lalonde Physio
Paul Osadzuk	ON	Bayshore Physical Therapy
Paulette Ruel	QC	Self-employed
Pauline Siu-Man Cheung	ON	Clarkson Sports and Physiotherapy
Peter Theodosopoulos	ON	Your Health Medical & Rehab

Philemon Ayele	BC	Easthill Physiotherapy
Philip Ruiz	NS	Back To Basics Physiotherapy
Philippe Michaud	NB	Physiothérapie Bouctouche
Regan Haley – PT Res.	NB	
Renate VanLeeuwen	ON	William Osler Health System
Richard Chu	ON	Focus Physiotherapy
Richard Quenneville	ON	Active Living Physiotherapy
Richard Roy	QC	Richard Roy physiothérapeute
Roman Andres Izquierdo	ON	Athlete's Care
Ruth Cassidy	BC	Self-employed
Samuel Choi	BC	Trifecta Rehab
Sandra Oxtoby	AB	Two Hands Physiotherapy
Sandra Voth	AB	Sport & Spine Physiotherapy Clinic
Sara Ann Gerring	BC	Sechelt Hospital
Sara Braun Holly	AB	Pincher Creek Health
Sara MacEachern	NS	First Step Physiotherapy
Sara Zboya	BC	Self-employed
Sarah Cole	NL	Eastern Health Physiotherapist
Sarah Croft	ON	Central Health Care
Sarah Godbout	ON	Hawkesbury Général Hospital
Shafiq Bhanji	ON	President: Athlete's Care
Shannon Mulholland	ON	Kaymar Rehabilitation
Shelagh Baker	ON	Independent Physiotherapy Consultant
Shelley G. O'Connor	ON	InsideOut Physiotherapy
Sonal Sansare	ON	Wilson Memorial General Hospital
Sonia Lena	ON	Oak Ridges Physiotherapy
Sonia Wiebe	ON	Wiebe Physiotherapy
Staci Hayes	SK	Victoria Hospital
Steven Genis	ON	Spot Physiotherapy
Steven Savage	ON	CBI Health
Sumya Khudadad –PT Res.	ON	
Susan Bloxsome	BC	Comox Valley Physiotherapy
Suzanne Rodzoniak	BC	Ascend Physiotherapy
Sydney Chodan	AB	Southland Leisure Centre
Sydney Santin	ON	Fortius Physiotherapy
Sylvie Best	ON	Physiotherapy centre of Bancroft
Tara Smith	ON	West Parry Sound Health
Tara Wolchuk	MB	Tara Wolchuk Physiotherapy
Telma Grant	ON	Self-employed
Thane Phillips	YK	PhysioPlus
Thea Cooney	BC	Burnaby Heights Physio
Tim Hunt	BC	Self-employed
Tom Pachal	MB	Wellness Institute
Trevor Williams Cervelli	NS	CBI Health Bridgewater
Twinkle Kavi – PT Res.	ON	
Tyson Boudreau	NB	Max Moncton Physiotherapy
Vanita Malhotra	NB	The Classic Therapy Group

Veronica Hatcher	ON	Waterview Physiotherapy
Victoria Renwick	BC	FusionPhysio
Victoria Weir	NS	Nova Scotia Health
Victoria Windle	ON	Morrisburg Physiotherapy
Vincent Turpin	ON	Physio X Rehabilitation
Vivek Sharma	ON	MSK WorkAssist
W. Paul Wright	BC	Coast Physiotherapy Sechelt
Wendy Bowen	BC	Wendy Bowen Physiotherapy
Wendy Brownlie	MB	Dynamic Physiotherapy
Wendy M Baines	ON	Partners Physiotherapy
Wendy Marlatt-Robulak	MB	Step Into Action Physiotherapy
Will Jeurond	ON	Back in Motion Physiotherapy
William Howatt	NB	PT Health
William Lyons	BC	Self-employed
Xavier David	AB	Physiotherapy InMotion
Zhen Lun Chen	QC	Self-employed
Zofia Nikipierowicz	ON	The Centre for Health