

January 23rd, 2020

Julia Douglas, Clerk
The Standing Committee on Finance and Economic Affairs
Room B-304, Whitney Block
Queen's Park, Toronto, ON
M7A 1A2

Submitted by email to: comm-financeaffairs@ola.org

RE: Ontario Physiotherapy Association Submission to the Standing Committee on Finance and Economic Affairs Pre-Budget Consultations

The Ontario Physiotherapy Association (OPA) is the Ontario Branch of the Canadian Physiotherapy Association representing more than 6000-member physiotherapists, physiotherapist assistants and students across the Province. Physiotherapists provide assessment and diagnosis, treatment and rehabilitation in all sectors of the healthcare system across Ontario, including in hospitals, primary health care (including Family Health Teams, Community Health Centres, Nurse Practitioner-Led Clinics and Aboriginal Health Access Centres), home care, long-term care homes, private clinics and community rehabilitation programs.

We note that the government has included in previous budgets commitments to implement changes to the legislated scopes of practice for healthcare professions to allow them to practise to their full knowledge and skills on behalf of Ontarians. In some cases, the Budget Bill has actually included legislation to do so for specific professions.

The OPA agrees with this direction by the government and fully supports these critical changes to respond to the challenges of today's health system, including reducing the burden of hallway healthcare and the unnecessary red tape that slows access to medically-necessary care. We hope that the Standing Committee and the forthcoming Budget make specific reference to implementing the scope of practice changes for physiotherapy that remain outstanding from 2009. Those scope of practice changes are:

- Ordering laboratory tests;
- Ordering radiographs; and
- Ordering the application of "forms of energy", such as MRIs and diagnostic ultrasound.

Each can be implemented by regulation under legislation that the Ontario Legislature has already passed and that has been granted Royal Assent.¹ The College of Physiotherapists of Ontario has already put in place Standards of Practice to ensure that only those physiotherapists who have the required knowledge, skills and judgment are able to perform them. Each authorized act when

¹ "An Act to amend various Acts related to regulated health professions and certain other Acts". The scope of practice amendments to the Physiotherapy Act, 1993 are listed in section 22.

implemented will generate substantial benefits to and improvements in Ontario's healthcare delivery system, without the expenditure of any additional public funds and without any additional costs incurred by the healthcare system generally.

The net benefits of enabling healthcare practitioners to practise to the full extent of their competencies have been well and thoroughly documented in the research literature and by experience in other jurisdictions. They have also been acknowledged by (for example) the Premier's Council on Improving Healthcare and Ending Hallway Medicine.²

In the case of physiotherapy, those net benefits have been presented to and validated by:

- The Ministry of Health and Long-Term Care, during the period 2006-2011
- The Health Professions Regulatory Advisory Council, during its review in 2007-2008.
- The Ontario Legislature and the Standing Committee on Social Policy during their reviews of the enabling statutory amendments (Bill 179) in 2009.

Since the passage of Bill 179 in December 2009 with all-party support, the OPA and the College of Physiotherapists of Ontario have made multiple submissions to the Ministry of Health as requested in response to the Ministry's changing evaluation criteria for regulation changes. Those submissions have identified, and whenever possible quantified, the fiscal and economic benefits to be derived from the scope changes, as well as the net benefits to Ontario's healthcare delivery system.

The OPA asks the Standing Committee to recommend that the government complete the scope of practice changes for the physiotherapy profession. After more than a decade of evaluations and study and the passing of the primary legislation, doing so needs only the implementation regulations. Once in place, those regulations will allow Ontarians to begin to experience the very substantial economic, fiscal and health system benefits that have been described and validated.

Yours sincerely,



Dorianne Sauvé
Chief Executive Officer

² Recommendations 9-10. "Capacity"; "A healthy Ontario: Building a sustainable health care system." Second Report of the Premier's Council on Improving Healthcare and Ending Hallway Medicine, June 25, 2019.