

College of PHYSIOTHERAPISTS of Ontario

2024 Fair Registration Practices Report

Prepared for the Office of the Fairness Commissioner (OFC)



FAIRNESS COMMISSIONER
COMMISSAIRE À L'ÉQUITÉ

Content

1. Background
2. Organization information
3. Registration requirements
4. Third party assessments
5. Accomplishments, risks and mitigations
6. Changes to registration practices
7. Membership and application data

Glossary of terms

1. Background

Under section 22.7(1) of Schedule 2 of the Regulated Health Professions Act, 1991 (RHPA), which is substantially similar to section 20 of the Fair Access to Regulated Professions and Compulsory Trades Act, 2006 (FARPACTA).

“A regulated profession shall prepare a fair registration practices report annually or at such other times as the Fairness Commissioner may specify or at such times as may be specified in the regulations”.

Section 22.9 of Schedule 2 of the RHPA and Section 23 of FARPACTA then go on to indicate that the Fairness Commissioner shall specify the form in which these reports shall be prepared, along with the required filing dates. This section also stipulates that a regulator must make these reports public.

It is pursuant to these authorities that the Office of the Fairness Commissioner (OFC) has required that each regulator complete its annual Fair Registration Practices Report (FRP).

Please note that this report covers the time-period from January 1 to December 31, 2024.

The FRP:

- Collects information about the organization, applicants to the profession and current membership.
- Provides information to the public about how the organization has implemented fair registration practices during the reporting period.
- Helps the OFC to successfully undertake the education and compliance activities which include monitoring, applying a risk-informed compliance framework, assessing performance, and sharing best practices.
- Determines whether the regulator is complying with recently enacted legislative and regulatory provisions designed to reduce barriers for domestic labour mobility and internationally trained applicants.
- Identifies trends across regulated professions and regulated health colleges.

2. Organization information

Organization name	College of PHYSIOTHERAPISTS of Ontario
--------------------------	----------------------------------------

For questions about this report, please contact:

Name	Melanie Liu
Job Title	Registration Team Lead
E-mail	mliu@collegept.org
Name	Anita Ashton
Job Title	Deputy Registrar & CRO
E-mail	aashton@collegept.org

3. Registration requirements

Applicants to the regulated professions and compulsory trades must fulfil registration requirements to practice their profession or use a professional title. This section summarizes registration requirements for each profession or trade regulated by College of PHYSIOTHERAPISTS of Ontario

Licensing requirements (brief description for each requirement listed):

Profession/ Trade Name	Physiotherapist
Academic requirement	A minimum of a bachelor's degree in physiotherapy is required. Individuals who have received their physiotherapy education outside of Canada must have their credentials assessed by the Canadian Alliance of Physiotherapy Regulators (CAPR). Graduates of a

	Canadian University Program will have a Master's degree upon graduation.
Experience requirement	The College does not have a Canadian experience requirement. All applicants are required to successfully complete an entry to practice examination as a part of the licensure process. After licensure, currency of practice is maintained, in part, by having completed 1200 practice hours over the preceding five-year period. Practice hours do not have to be from Ontario. To obtain practice hours physiotherapists can practice in clinical and non-clinical roles related to the profession. Practice hours are defined as hours worked that have been paid for. This can include direct professional services, administration, teaching, research, clinical education or sales.
Language requirement	An applicant must be able to deliver patient care in either English or French. If individuals completed their entry to practice education in Canada, they do not need to complete a language proficiency assessment. If they completed their entry-to-practice physiotherapy education (both classroom and clinical portions) in one of the following countries (where English or French is the official national and only language used primarily in all levels of education): Australia, United States of America, New Zealand, Republic of Ireland, United Kingdom, or France they do not need to complete a language proficiency assessment.

	<p>Applicants educated in other international jurisdictions must achieve the minimum score in each language skill area (writing, speaking, listening, and reading) on one of the approved language tests: • Canadian English Language Proficiency Index Program General (CELPIP G) • International English Language Testing System General Training (IELTS GT) • International English Language Testing System Academic (IELTS AC) • Pearson Test of English Core (PTE Core) • Test d'évaluation du français (TEF) • TEF Canada, TEF Quebec and TEF 5 épreuves • Test de connaissance du français (TCF) • TCF Canada, TCF Quebec and TCF Tout Public The results of the language assessment must be submitted to CAPR as part of the credentialling process.</p> <p>https://alliancept.org/internationally-trained/credentialing-overview/policies/2-2-language-proficiency/</p>
<p>Additional information on licensing requirements (may include links to appropriate page on regulator website):</p>	<p>The College's General Regulation O Reg 532/98 outlines the requirements that an applicant must currently meet in order to apply for a Provisional Practice certificate of registration, an Independent Practice certificate of registration, a Courtesy certificate of registration and an Emergency certificate of registration. To apply for a Provisional Practice certificate of registration an applicant must meet a number of requirements including having successfully completed the</p>

	<p>Physiotherapy Competency Exam (PCE)</p> <p>- written administered by the Canadian Alliance of Physiotherapy Regulators (CAPR). CAPR is a national organization that provides credentialing and exam services for provincial physiotherapy regulators. A candidate has three attempts to successfully complete the written exam. Once they successfully complete the written exam, they can apply for a Provisional Practice certificate of registration where they will practice as a Resident, under supervision while they wait to attempt the next administration of the clinical exam. In order to be issued an Independent Practice certificate of registration, an applicant must meet a number of requirements including but not limited to the successful completion of a written exam and a clinical exam. At this time the exams approved by the Board include the:</p> <ul style="list-style-type: none"> • Canadian Alliance of Physiotherapy Regulators (CAPR) written exam + the CAPR clinical exam • CAPR written exam + University of Sherbrooke Final Comprehensive Exam (French) • CAPR written exam + Ontario Clinical Exam (OCE) - available in English and French <p>Applicants also have three attempts at the clinical exam. Within the first year of registration, Independent Practice Certificate Holders must also successfully complete the Jurisprudence module.</p>

4. Third party assessments

Third party organizations that assess qualifications on behalf of the regulator.

Organization name	Function
The Canadian Alliance of Physiotherapy Regulators (CAPR)	Knowledge based exam
The Canadian Alliance of Physiotherapy Regulators (CAPR)	Academic credential evaluation

Fair access legislation requires regulators to take reasonable measures to ensure that any third parties undertake assessment of qualifications in a way that is transparent, objective, impartial and fair.

College of PHYSIOTHERAPISTS of Ontario takes the following measure(s) to ensure fair and timely assessments:

The College monitors third-party performance by:

- Monthly meetings with the Registrar and CAPR's Executive Director
- Monitoring trends in inquiries from prospective applicants
- Obtaining data reports in an ongoing way regarding all aspects of credentialing and examinations from CAPR
- Participating in system partner meetings
- Having CAPR present to the Board (presentations were made at the June 24, 2024, December 9 2024 board meetings)
- Staff on the College's Registration teams and Examinations teams have a close working relationship with counterpart colleagues at CAPR.
- Service level agreements are being developed to reflect the current business relationship between CAPR and the College.

5. Accomplishments, risks and mitigations

Key accomplishments and risks pertaining to fair registration practices during the reporting period are summarized below.

A. Accomplishments

1	The College engaged the services of a third-party psychometrician to review all aspects of the College's exam program as it relates to the Ontario Clinical Exam (OCE) Many of the recommendations have already been addressed and longer terms plans will be finalized in the spring of 2025.
2	In the spring of 2024, the College released a series of 6 e-learning modules aimed at supporting physiotherapists as they transition to practice in Ontario. The modules cover person centered care in the practice of physiotherapy, effective communication techniques, inter and intra professional collaboration, patient safety in physiotherapy, boundaries and consent and business practices. The modules are also made available to the public through our website. In the spirit of collaboration, these modules were shared with our national partners and the Canadian Alliance of Physiotherapy Regulators (CAPR) so that the content can be accessed by others.
3	In mid-2024 the College launched a new website. Working with plain language consultants the College worked to ensure that the information about the exam and registration process was accessible and easy to understand. Questions and concerns about the website can be shared with the College when the user is on the site. This allows us to address concerns in an efficient manner. Information about our registration processes, the exam and our welcome guide for new physiotherapist are also available in French.
4	The College is making a philosophical shift towards being a more compassionate regulator. This includes additional training for staff, plain language review of public facing documentation and customer service approaches built on empathy.

B. Risks and Mitigations

Risk	Mitigation Measure
Taking on the development and administration of the clinical exam was a big undertaking for the College. In an effort to release results in a timely manner we had candidates for one administration having to register and then complete annual renewal a short	Future OCE exam dates were realigned to better manage the cadence of work for both program areas.

time later. Our Registration team and IT team were able to make adjustments to allow for a seamless transition process for this group.	
----------------------------------------------------------------------------------------------------------------------------------------	--

6. Changes to registration practices

During the January 1 to December 31, 2024 reporting period, College of PHYSIOTHERAPISTS of Ontario has introduced the following changes impacting its registration processes. Changes, anticipated impacts, and risk mitigation are summarized below.

A. Registration requirements and practices

Registration process	Changes Made (Yes / No)	Description
Registration requirements either through regulation, by-law or policy	Yes	The Registration Committee created two new policies in 2024: Applying for a Second Provisional Practice Certificate of Registration (PPC) (no practical / clinical exam attempted) – May 2024 Registration Committee Policy for Exempting Returning Applicants from the required Clinical Examination - September 2024
New or consolidated class of certificates or licenses	No	
Assessment of qualifications, including competency-based assessments and examinations	No	

Documentation requirements for registration	No	
Timelines for registration, decisions and/or responses	No	
Registration and/or assessment fees	Yes	The annual registration fee for a physiotherapist who holds an Independent Practice certificate of registration was increased to \$648 from \$635.
Changes to internal review or appeal process	No	
Access by applicants to their records	No	
Other	No	

B. Training, policy and applicant supports

Registration process	Changes Made (Yes / No)	Description
Training and resources for staff who deal with registration issues	Yes	College staff participated in a Plain Language Training session to ensure our ongoing communication with applicants/registrants was clear and compassionate. Additional training was provided through Mental Health First Aid. Staff also had the opportunity to participate in the 2SLGBTQ Foundations Course offered through Rainbow Health. Staff also had the opportunity to increase their understanding of Indigenous history in Canada and consider how different lived experiences can be incorporated into our processes.

Resources or training to support applicants to move through the licensing process	No	
Anti-racism and inclusion-based policies and practices	Yes	<p>Equity, Diversity, and Inclusion (EDI) is reflected in the College's Strategic Plan, which places a focus on embracing a culture where an EDI lens is intentionally incorporated into all levels of decision making at the College. The College has a statement of awareness around EDI issues and shares resources through its EDI webpage. The College has a dedicated internal team working on College-wide EDI projects. The College allocates internal resources and works with external partners to implement EDI activities that are in support of this plan. In 2024, the College pursued the following initiatives:</p> <ul style="list-style-type: none"> · Developed an Equity, Diversity and Inclusion strategy · Published an EDI report to highlight commitments, actions and progress towards EDI goals · Continued efforts to support internationally educated physiotherapists to successfully transition to practice in Ontario <p>In 2023, the Health Profession Regulators of Ontario (HPRO) developed an EDI Organizational Self-Assessment and Action Guide, which includes a toolkit to assist health regulatory organizations in developing their own Equity Impact Assessments (EIA). Using this toolkit, the College developed a customized assessment of equity impact to address the College's unique circumstances. In October and November 2023, the College conducted an organizational EDI self-assessment exercise. This exercise related to an organization-wide reflection of</p>

		<p>where the different areas of the College (governance, registration, conduct, policy, etc.) are currently positioned with respect to approaching their work through an EDI lens. This was supported by the EDI Self-Assessment Reflection Tool informed by the indicators developed by HPRO. This tool included the self-assessment matrix developed by HPRO, where different areas of the College could indicate whether they feel they are inactive, reactive, proactive, or progressive with respect to their work at the College. This reflection tool is not publicly accessible. In 2024, the College expanded the Equity Impact Assessment activity to individual departments. We leveraged the same EIA toolkit to conduct equity impact assessments at the department level. These departmental self-assessments helped teams critically assess their work from an EDI lens to understand the current state and to plan concrete improvement actions for the future. The College intends to conduct this exercise annually to ensure sustained progress towards our EDI goals. An update about this work was provided to the Board at the December 2024 meeting. We are also pleased to share our 2023-2024 Equity, Diversity and inclusion Report.</p>
--	--	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

C. System partners

Registration process	Changes Made (Yes / No)	Description
Steps to increase accountability of third-party service provider(s)	No	

Accreditation of educational programs	No	
Mutual recognition agreements	No	

D. Responsiveness to changes in the regulatory environment

Registration process	Changes Made (Yes / No)	Description
Emergency registration plans	No	
Technological or digital improvements	Yes	In 2023, the College introduced individual dashboards for all registration staff to assist with work planning and accountability. In 2024, the College continued to leverage its technology by making continuous improvements to these specific dashboards.
Steps to address labour shortages in the profession or trade	No	

7. Membership and application data

The Office of the Fairness Commissioner collects membership and application data from regulators through annual Fair Registration Practices Reports, which are also made available to the public. Information is collected for the purpose of discerning statistical changes and trends related to a regulator's membership, application volumes, licensure/certification results, and appeals year over year.

A. Race-based data collected

	Race-based data collected? (Yes or No)
Members	YES
Applicants	YES

Additional description:

This is collected on a voluntary basis only and it does not reflect the entirety of the profession. Our ability to refer to it is limited at this time due to the quality of the data.

B. Other identity-based or demographic data collected

	Other identity-based or demographic data collected? (Yes or No)
Members	Yes
Applicants	Yes

Additional description:

This is collected on a voluntary basis only and it does not reflect the entirety of the profession. Our ability to refer to it is limited at this time due to the quality of the data.

C. Languages of service provision

College of PHYSIOTHERAPISTS of Ontario makes application materials and information available to applicants in the following languages.

Language	Yes / No
English	Yes
French	Yes
Other (please specify)	

D. Membership Profile

Profession Name	Total Number of Members
Physiotherapist	12348

Class of License	Total Number of Members	Number of Internationally Educated Members
Full / General/ Independent Practice	11665	3749
Provisional Practice	683	359

Gender	Number of Members
Male	3692
Female	8647
X (includes trans, non-binary, and two-spirit people)	9

Jurisdiction of Initial Training	Number of Members
Ontario	7198
Other provinces and territories	724
United States	318
Other International	4108

Country of Initial Training	Number of Members
Canada	7922
India	2300
United States of America	318

Philippines	242
Australia	197
Iran	122
United Kingdom	527
Hong Kong	76
Pakistan	71
Poland	65
Ireland	61
Egypt	53
Brazil	45
South Africa	39
Netherlands	34
Colombia	28
Nigeria	20
Jamaica	15
New Zealand	14
Sri Lanka	14
Lebanon	14
Israel	13
Hungary	11
Romania	10
Bulgaria	10
United Arab Emirates	10
Belgium	8
China	8
Serbia	4
Chile	7
Bangladesh	6
Turkiye	6
Jordan	6
Argentina	6
South Korea	5
Czechia	4
Saudi Arabia	4
Portugal	3
Nepal	3
Peru	2
Italy	2

Germany	2
Mauritius	2
Switzerland	2
Finland	2
Ukraine	2
France	2
Spain	2
Slovenia	2
Venezuela	2
Zambia	2
Thailand	1
Croatia	1
Kuwait	1
Ethiopia	1
Panama	1
Mexico	1
Kenya	1
Japan	1
Greece	1
Sudan	1
Uruguay	1
Ghana	1
Bolivia	1
Taiwan	1
Malaysia	1
Malta	1
Montenegro	7

Official language of preference	Number of Members
English	12236
French	112

Racial identity (optional)	Number of Members
----------------------------	-------------------

Black	50
East / Southeast Asian	356
Indigenous	0
Latin American	40
Middle Eastern	60
South Asian	301
White	1465
Other	217
Not collected	9859

E. Data Notes

Please disregard the figures in A6. The system would not let me proceed because the total number did not equal the total number of members. Please find the accurate figures listed below. Members can select MORE than one race. Providing this information to CPO is optional. The number for "Not Collected" is better defined as "Not Provided". Black 50 East/Southeast Asian 356 Indigenous 0 Latin American 40 Middle Eastern 60 South Asian 301 White 1465 Other 217 Not Collected 9892

F. Applicant Profile

Profession Name	Total Number of Applicants
Physiotherapist	2050

Gender	Number of Applicants
Male	554
Female	1493
X (includes trans, non-binary, and two-spirit people)	3

Jurisdiction of Initial Training	Applications received in 2024	Applications with decisions pending (in progress at end of reporting year)
Ontario	762	7
Other provinces and territories	59	2
United States	19	2
Other International	1210	75

Country of Initial Training	Number of Applicants
Canada	821
India	796
Australia	54
Philippines	49
Ireland	20
Iran	20
United States of America	19
Hong Kong	13
Brazil	12
Nigeria	11
Pakistan	8
Lebanon	8
Netherlands	7
South Africa	6
Egypt	6
Colombia	5
Spain	4
Nepal	4
China	4
Sri Lanka	3
United Arab Emirates	3
Turkiye	3
Chile	3
Hungary	2

Jamaica	2
New Zealand	2
Argentina	2
South Korea	2
Ethiopia	1
Jordan	1
Zambia	1
Denmark	1
Japan	1
Romania	1
Malaysia	1
Germany	1
Mexico	1
Ecuador	1
United Kingdom	151

Official language of preference	Number of Applicants
English	2043
French	7

Racial identity (optional)	Number of Applicants
Black	9
East / Southeast Asian	77
Indigenous	0
Latin American	16
Middle Eastern	10
South Asian	122
White	104
Other	7
Not collected	1705

G. Data Notes

For B5: Please disregard the figures provided. The system would not accept my responses because applicants can select more than one race. Providing this information to CPO is optional Black 9 East Southeast Asian 77 Indigenous 0 Latin American 16 Middle Eastern 10 South Asian 122 White 104 Other 7 Not Collected 1708

H. Application Decisions

The table below summarizes the outcome of registration decisions finalized in 2024. Some applications may have been received in the previous year.

Jurisdiction of initial training	Successful	Unsuccessful	Withdrawn
Ontario	774	0	1
Other provinces and territories	53	0	4
United States	17	0	0
Other International	1173	6	21

I. New Registrants

For the 2024 reporting year, the breakdown of new registrants by class of registration is provided below:

Class of registration	Total new registrants	Number of internationally educated registrants
Full / General/ Independent Practice	53	48
Provisional Practice	927	595
Courtesy	22	7

J. Data Notes

--

K. Reviews and Appeals

Applicants for registration may appeal a registration decision. An **internal review or appeal** involves formal reconsideration of a registration decision further to an application and submissions by the applicant.

Jurisdiction of initial training	Number of internal reviews and appeals processed	Number of decisions changed following internal review or appeal
Ontario	4	0
Other provinces and territories	3	0
United States	0	0
Other International	16	0

An **external review or appeal** involves review of a registration decision by an external appeal tribunal or court, such as the Health Professions Review and Appeal Board or Divisional Court.

Jurisdiction of initial training	Number of applicants who sought external review or appeal	Number of decisions changed following external review or appeal
Ontario	0	0
Other provinces and territories	0	0
United States	0	0

Other International	2	0
---------------------	---	---

Issues raised in reviews and appeals can point to challenges in the registration process. The table below summarizes top issues or reasons that applicants raised during these appeal proceedings.

Issue or reason raised	Number of appeals
1. The applicant should be exempt from the examination requirement	8
2. The applicant did not meet the currency requirement (1200 practice hours over the preceding five yea	7
3. Good character requirement	5

Internationally trained applicants face additional challenges in the registration process. The table below summarizes top reasons for not registering internationally trained individuals.

Reason for not registering	Number of internationally trained applicants
1. The applicant has not successfully completed a Board approved exam	8

L. Data Notes

For B.10 – The Registrar has two options to manage an application 1) register the applicant or 2) refer the application to the Registration Committee for review. The Registration Committee can direct the Registrar to issue the certificate, issue the certificate with terms and conditions, or refuse the application. In 2024 there were 2 appeals in process. At this point, we have not received a decision from HPARB on the outcome of these files.

Glossary of terms

Applicant: An individual who has applied for membership in a regulated profession or compulsory trade, with the associated rights to practice their profession / trade or use a professional title.

Domestic labour mobility: Applications subject to the Canadian Free Trade Agreement, which stipulates that a certificate issued by one province or territory should be recognized by all others unless there is an exception due to public health, safety and security reasons.

Internationally educated / trained: An individual whose initial professional education was not from a Canadian educational institution, or who is applying for trade certification based on experience gained outside Canada. This category includes individuals with education / training in the US and other countries. It also includes individuals who completed their initial professional education outside Canada and later addressed gaps with courses or a bridging program based in Canada.

Jurisdiction of initial training: For professions, the jurisdiction in which an applicant obtained their initial professional education used in full or partial fulfilment of registration requirements. For trades, the jurisdiction of initial trade experience listed on a Trades Equivalency Assessment (TEA) application.

Member: An individual who has satisfied the conditions for registration in their profession / trade and has been granted the right to practice and/or the right to use a professional designation or title. Members may hold a full license to engage in independent practice, or they may hold an alternate class of registration.

Racial identity: Voluntary self-report data of racial identity as a social description. Follows categories identified in the Ontario Anti-Racism Directorate Data <<https://www.ontario.ca/document/data-standards-identification-and-monitoring-systemic-racism>> .

Registration requirements: the entry-to-practice requirements that that an applicant must meet to be granted full membership in a regulated profession or trade, with the associated right to practice or right to use a professional title.

- **Academic requirement:** The formal education, or equivalent, that is required for licensing or certification in a particular regulated profession or trade.
- **Experience requirement:** The experiential training or work experience that is required for licensing or certification in a particular regulated profession or trade.
- **Language requirement:** The level of language proficiency that is required for licensing or certification in a particular regulated profession or trade, and the language proficiency tests accepted in fulfillment of this requirement.

Third party service provider: An external organization that assesses applicant qualifications on behalf of the regulator.