

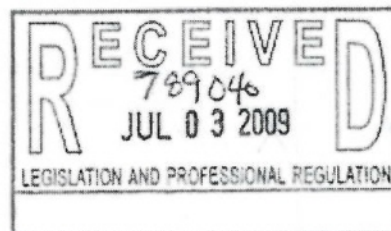


Physiotherapy Association
of British Columbia



College of Physical Therapists of British Columbia

Mr. Daryl Beckett,
Director, Professional Regulation,
Ministry of Health
5-1
1515 Blanshard Street
Victoria, BC
V8W 3C8



Dear Mr. Beckett:

The College of Physical Therapists of BC and the Physiotherapy Association of BC are currently reviewing the physiotherapy scope of practice and the restricted activities list in preparation for College Bylaw revisions to the Ministry.

The purpose of this letter is to request your input on issues that have been discussed but to which neither the College nor the Association have been able to find an answer.

First, in reviewing the Drug Schedules we have been unable to confirm whether oxygen is considered a drug or not. The answer to this question determines whether or not its application falls under prescription or administration in the restricted activities list.

Second, some of our registrants who work in orthopaedics and/or rheumatology have expressed an interest in having the authority to refer to radiology for diagnostic testing such as imaging and to laboratories for blood work for their rheumatologic patients. We recognize that these activities are listed on the restricted list and are considering making a submission to the Ministry to allow physical therapists to refer. Our immediate question to the Ministry is related to the payment of said services; to whom do we direct queries related to payment for radiology or laboratory services (it is our understanding currently that radiologists and laboratories can only bill for services requisitioned by a physician).

Third, "to put a finger into the external ear canal for the purposes of musculoskeletal assessment and intervention" is listed as a restricted activity. Could the Ministry please clarify what interventions would require this activity? We assume the intent of this activity on the Restricted Activity list is for the protection of the tympanic membrane,

clarify what interventions would require this activity? We assume the intent of this activity on the Restricted Activity list is for the protection of the tympanic membrane, which would not be relevant to physiotherapy, however the anatomical structures are unclear with respect to 'external ear canal'.

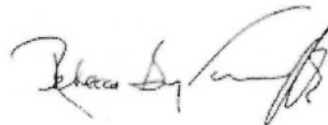
And finally, our joint task force presumes it is the work of the Ministry to determine if there is competing legislation for the jurisdictions of different medical professionals in such areas as imaging and blood work; is this correct?

We would be pleased to meet with you to discuss our queries and concerns on these items at any time convenient for you.

Sincerely yours,

A handwritten signature in cursive script, appearing to read "B. Hudson".

Brenda Hudson, CPTBC Registrar

A handwritten signature in cursive script, appearing to read "Rebecca Sympson".

RBT, PABC CEO