

Mr. Kevin Wilson, Executive Director  
Drug Plan and Extended Benefits Branch  
Ministry of Health  
T. C. Douglas Building  
3475 Albert Street  
Regina, Saskatchewan  
S4S 6X6

June 20, 2014

Dear Mr. Wilson,

Re: Changes to Special Needs Equipment Requisitioning

This letter is in response to the Drug Plan and Extended Benefits Branch correspondence to the Home Care Lead Committee dated April 7, 2014. In this letter, effective the date of release, requisitioning authority for mobility equipment has been given to Home Care Nurses.

We understand that that a response has already been sent to your office by the Saskatchewan Physiotherapy Association (SPA) on May 16, 2014. Many of the concerns outlined by the Saskatchewan Physiotherapy Association are identical to the concerns of the Saskatchewan College of Physical Therapists (SCPT). These concerns include: ensuring appropriate and safe follow up with clients following the prescription of equipment, ensuring that clients receive safe and effective intervention related to maintaining or improving mobility, and a concern for the safe and effective provision of Therapy services across the province. The SCPT agrees with the statement in the SPA letter:

*"While prescription of mobility devices is not limited to the scope of PT and OT practice, our knowledge and expertise makes us the preferred professional for the assessment of which type of mobility device will meet each individual's needs, based on their physical, environmental and economic needs."*

Accompanying the assignment of requisitioning authority to the Home Care Nurses is the statement: *"Any additional training required regarding assessment of functional needs and safe use of equipment based on physical abilities is the responsibility of the region."* It is our understanding from our Members that the responsibility for this training of the Home Care Nurses may be an expectation of the Physical Therapists within the Region. As the regulator for this profession in the province of Saskatchewan, we would like to bring to your attention some regulatory concerns that we have for our Members, and concerns that we have for the safety of the clients that will be affected by this decision.

As you will be aware, in the interest of protection of the public, the legislative requirements of our professionals make them responsible to ensure that any training that they provide to another professional ensures the safety of the clients that will subsequently receive care. For Physical Therapists there are a number of Practice Guidelines that address the many steps that need to be followed in assessing, fitting, training, and follow up for a client being prescribed specialized equipment. If providing training to another professional (in this case to a Home Care Nurse) the Physical Therapist may be considered partly at fault under our legislation if a client is harmed using equipment prescribed by the professional trained by the Physical Therapist if it is later determined that the training provided to the other professional was insufficient. The training required is extensive, needs to be comprehensive, and requires that the Physical Therapist includes a component that is able to measure competency following the training. The administrative time and effort required for an undertaking such as this would be significant. In the interest of the protection of the public we have advised our Members to consider the comprehensiveness required if they choose to be involved in this training.

As a profession in the province we have been in similar situations where further education of our Members was required to ensure safe and competent care in a specific area of practice. This training and education was subsequently organized and provided by the continuing education organizations for Physical Therapy in Saskatchewan. As the regulatory body, it is our recommendation that the Ministry of Health and/or nursing professional, educational, or regulatory organizations provide standardized training for home care nurses as soon as possible to minimize risk to all of the professionals involved and to keep our patients safe.

We thank you for your consideration, and would welcome the opportunity to speak with the Ministry of Health further on this issue.

With regard,

Elizabeth Rackow, PT  
President, SCPT

c.c. Honourable Dustin Duncan, Minister of Health  
Honourable Tim McMillan, Minister Responsible for Rural and Remote Health