

Update: December 14

CMOH Order 42 came into force at midnight on December 13, 2020, and applies to private businesses, including businesses offering health care services. Although much of the content of the order was previously discussed in Physiotherapy Alberta's [December 9th COVID Update](#), there are three issues of note that have been clarified in recent days through meetings with representatives from Alberta Health and the Chief Medical Officer of Health's Staff and through a review of the written order. These issues relate to:

- Personal protective equipment; specifically, the use of eye protection
- Close Contact Definition and Contact Tracing
- One-on-one service provision

Personal Protective Equipment

Physiotherapy Alberta has received multiple calls and emails in recent days from registered physiotherapists regarding the recent Alberta Health Services (AHS) directive that their employees must wear eye protection (goggles or visor) in addition to continuous masking. Some callers have asked if eye protection is required to avoid being considered a close contact if a physiotherapist treats a patient who later goes on to develop symptoms and test positive for COVID-19.

During the meeting with representatives from Alberta Health and the CMOH office, it was confirmed that the requirements for PPE at a provincial level have not changed. Specifically, eye protection is not currently required to avoid being considered a close contact of an asymptomatic patient who develops symptoms of COVID-19 within 48 hours of their physiotherapy visit and subsequently tests positive for COVID-19.

As has been the case since May, **all physiotherapists** are required to engage in continuous masking using medical grade surgical or procedure masks, rigorous hand hygiene consistent with the WHO 5-moments for hand hygiene, point of care risk assessment to determine the need for additional PPE and other measures, and frequent cleaning and disinfecting of surfaces using Health Canada approved disinfectants.

Physiotherapists working in private health care environments (e.g., private practice clinics, mobile practice settings), are also required to engage in active screening of both patients and staff to ensure that no one exhibiting signs or symptoms of COVID-19 enters the practice setting.

Alberta Health confirmed that they are carefully reviewing the scientific evidence regarding eye protection. It is possible that the Alberta Health recommendations regarding eye protection may change as the evidence evolves.

As is always the case, employers may establish standards or operational requirements that exceed the requirements of Physiotherapy Alberta, other regulators, or Alberta Health. This appears to be the situation with AHS' requirement that their employees wear eye protection. Other employers may choose to take similar action if they determine that the risks in of their practice setting warrant such action.

Physiotherapists employed by AHS must adhere to the requirements established by their employer, in addition to those established by Physiotherapy Alberta.

Close Contact Definition and Contact Tracing

Physiotherapy Alberta has heard from some regulated members who have reported that they have received notification that they were considered a close contact despite adhering to guidance from Physiotherapy Alberta regarding continuous masking using medical grade surgical or procedure masks, hand hygiene and proper screening of patients. We have heard from other regulatory organizations that their regulated members have had similar experiences.

Alberta Health has confirmed that the definition of close contact has not changed and that if a health professional was:

- Wearing a medical grade surgical or procedure mask **and**
- Practicing rigorous hand hygiene,

And the patient:

- Was asymptomatic,
- Was not themselves a close contact of someone with COVID-19 **and**
- Had not recently traveled outside of Canada at the time of the treatment visit.*

The health professional is not considered a close contact of a patient who develops symptoms of COVID-19 within 48 hours of their appointment and goes on to test positive for the virus.

*As was noted in the [November 25th COVID Update](#), individuals participating in the Alberta COVID-19 Border Testing Pilot Program are not allowed to attend any setting where health care services are provided for 14 days.

Proper PPE and hand hygiene are important, but active screening for signs and symptoms of infection, recent travel, and recent close contact with someone who has tested positive for COVID-19 are equally important. Individuals with risk factors for COVID-19 or even mild symptoms must not be in the practice setting. In some instances, physiotherapists have reported that they were identified as close contacts because the patient was later found to have had symptoms at the time of their physiotherapy visit.

If a physiotherapist is contacted and advised that they are a close contact to a patient who has tested positive, they will need to highlight the PPE and other measures in use at the time of patient contact and seek additional information regarding their specific case to understand why they are being considered a close contact.

One-on-One Service Provision

As was noted in the December 9th update, CMOH Order 42 enables physiotherapists to provide one-on-one in-person health services by appointment only. We have heard from some regulated members who have asked how this rule effects the provision of physiotherapy services by physiotherapist support workers.

Physiotherapy Alberta's perspective is that when support workers provide physiotherapy services, they are to be doing so under the supervision and direction of a regulated physiotherapist and in accordance with the standards and requirements established for the provision of physiotherapy services during the pandemic. The support worker is acting as an extension of the physiotherapist and is able to provide physiotherapy services due to the active supervision provided by the physiotherapist. The physiotherapist remains accountable for the services assigned, the appropriateness of that assignment, and the quality and safety of the services provided.

If a physiotherapist employs support workers to assist with the provision of physiotherapy services, regardless of the education or credentials of the support worker, Physiotherapy Alberta expects that

- All expectations outlined in the Standard of Practice – Supervision are met, including:
 - services are assigned by the physiotherapist,
 - the patient understands the roles of the physiotherapist and support worker respectively,
 - the patient consents to the support worker's involvement,
 - the physiotherapist provides ongoing monitoring and re-assessment of the patient's status and progress,
 - supervision strategies are in use to ensure quality and effective services are provided by the support worker.
- The booking record clearly identifies that the patient is booked with the physiotherapist.
- The patient reports seeing the physiotherapist for a component of the treatment session and understands and can describe the supervisory relationship between the physiotherapist and the support worker.

Consistent with CMOH Order 42, neither the physiotherapist or the physiotherapist support worker may be responsible for the care and treatment of more than one patient at any time.

Physiotherapy Alberta is aware of ongoing advocacy on the part of members of unregulated health professions who have been seeking exemptions to be able to provide in-person health or wellness services. Physiotherapy business owners are advised to review the CMOH orders and the Government of Alberta website, and to stay aware of developments that are relevant to their business model.

In the interim, physiotherapists must not engage in activities that reflect supervision in name only, for the purpose of enabling unregulated health professionals to provide one-on-one services.

Exercise-based Physiotherapy Interventions

Physiotherapy Alberta is a strong proponent of exercise-based physiotherapy interventions. However, considering the requirement that gyms, fitness and recreation centers, yoga and Pilates studios close; the prohibition on indoor group physical activity; and the requirement that only one-on-one professional services be provided, Physiotherapy Alberta's direction to members is as follows:

- No group classes may be offered in private physiotherapy practice environments (e.g., GLAD, Falls and Balance Classes, Parkinson’s Group Classes).
- Physiotherapy services are to be offered at a one-on-one ratio only.
- If physiotherapy services are exclusively exercise based, they should be offered via telerehabilitation and home exercise programming.
- “Physiotherapy” should not constitute a work-around to enable gym access.

In addition, physiotherapists who operate out of gyms and similar environments are advised as follows:

- As stated in Part 6, Section 28 of the order, health services may be offered in settings that are otherwise required to be closed (e.g., Pilates studios), however physiotherapists operating in these settings will need to discuss their business operations with facility owners and are advised to anticipate questions, concerns or complaints from community members who observe the physiotherapist’s operations in these settings.

In Summary

Physiotherapists need to maintain their awareness of the Orders issued by Chief Medical Officer of Health Dr. Hinshaw. They also need to continue to employ the measures put in place in May to enable safe service provision during the pandemic.

With rising case numbers and increasing business restrictions, Physiotherapy Alberta recognizes the ongoing stress and challenges faced by all physiotherapists. We encourage physiotherapists to attend to their own health and well-being as the pandemic continues. Like our regulated members, we are buoyed by news of the arrival of the COVID-19 vaccine and are encouraged to continue efforts to support and maintain safe practice environments until the full impact of vaccination programs can be realized.