

January 2020

Physiotherapy Board of New Zealand  
By email

## **Consultation on Advanced Practice Physiotherapist**

Dear Janice and members of the Physiotherapy Board of New Zealand,

Physiotherapy New Zealand (PNZ) is providing feedback on behalf of PNZ members to the Physiotherapy Board of New Zealand (the Physiotherapy Board) on the proposed Advanced Practice Physiotherapy (APP) Scope of Practice in Aotearoa New Zealand.

PNZ is the professional membership organisation for registered physiotherapists in New Zealand with over 4,300 members, representing just under 70 per cent of all physiotherapists holding an Annual Practising Certificate.

Discussions between Physiotherapy New Zealand (PNZ) and the Physiotherapy Board related to recognition of those physiotherapists who have gained specific qualifications and expertise in an area of practice have occurred over a number of years. In 2015, PNZ formed the Professional Development Committee (PDC) to replace the disestablished New Zealand College of Physiotherapy. A key purpose of the PDC was to establish and promote a career pathway for physiotherapy practice in New Zealand; this included exploration of developing an advanced practitioner category. The legal opinion from the Physiotherapy Board in 2016 considered that under the Health Practitioners Competence Assurance Act 2003 (HPCA Act) the development of this type of practitioner category required a scope of practice, which is regulated by the Physiotherapy Board. Since that time, PNZ has been working collaboratively with the Physiotherapy Board in the development of the Advanced Practice Physiotherapy title, scope of practice, qualification and experience criteria.

We have not seen an alternative legal opinion and therefore the PNZ Executive, guided by the advice from the PDC, understands that the New Zealand context of the HPCA Act requires a titled scope remains the current advice. On that basis we support the proposed Advanced Physiotherapy Practitioner Scope of Practice.

We are aware there is a range of opinions among the profession, reflected also among PNZ members. However, this submission is based on the long-term view of PNZ through its strategic planning and the work of the PDC across the last five years.

Our responses to the questions you posed in the consultation survey are:

### **1. How would the proposed Advanced Practice Physiotherapy title, scope of practice, qualification and experience criteria help to protect the health and safety of members of the public?**

While the general scope of practice offers considerable protection from risk to public safety across a very broad range of physiotherapy skills and expertise, the experience of the additional Specialist Scope of Practice would indicate that the Physiotherapy Board have already demonstrated that additional titled roles can support increased health and safety of the public. Adding an intermediary step between general scope and specialist is consistent with previous decisions of the Physiotherapy Board.

As demonstrated by the literature review undertaken as part of the development of the career framework, "evidence suggested that advanced physiotherapy roles may provide benefits to the public and health system when implemented in innovative, interdisciplinary and non-traditional

ways.”<sup>1</sup> We note also that World Physiotherapy (formerly World Confederation of Physiotherapy) in the 2019 Policy Statement on Advanced Physical Therapy Practice concluded, “There is a growing body of evidence that suggests that advanced physical therapy practice is both clinically and economically effective. Further, that it delivers a desirable experience and improved outcomes for patients and clients.”<sup>2</sup>

Our ageing population is predicted to place more pressure on the health system resulting in reduced access and secondary co-morbidities as a result. PNZ believes there is potential for better engagement of physiotherapists within the health system to support better access to health for all New Zealanders. The National Health Service (NHS) in the United Kingdom adopted the First Contact Practitioner<sup>3</sup> service which was “usually an Advanced practice physiotherapist” and has been shown to be effective at managing rising demand for elective services; improving patient experience and outcomes and providing more integrated person-centred care

It is difficult to ascertain how the public would be able to determine the specific areas the Advanced Practice Physiotherapist applies to for each physiotherapist e.g. Advanced Practice Physiotherapist for musculoskeletal versus women’s health. To achieve this, PNZ suggests that a considerable effort would be required to educate the public and other health professionals about this issue.

## **2. Do you agree with the development of an Advanced Practice Physiotherapist Scope of Practice?**

**Yes** to the development of a career pathway. Based on the legal advice from 2016, in the New Zealand context a career framework for physiotherapists within the HPCA Act requires titled scopes.

### **Further comment on development of Advanced Practice Physiotherapist**

The three main areas of concern for PNZ members are: career pathway; remuneration; and retention. These must be achieved alongside the improvement in health outcomes; a reduction in inequities in the health system; and public safety. One of PNZ’s key strategic priorities (PNZ Strategy 2016-2020 update) is career development – to ensure the growth and development of the profession (in order to deliver new models of health care to improve efficiencies of service delivery).

Workforce retention and attrition is a major concern for the physiotherapy profession. Research undertaken by Business and Economic Research Ltd (BERL) for PNZ in both 2018<sup>4</sup> and 2019<sup>5</sup> highlighted the lack of a perceived career pathway as a major concern for physiotherapists and a contributing factor to the number of physiotherapists who leave the profession before the seven year mark.

PNZ is aware that there is no single approach to the advanced practitioner role internationally. The United Kingdom and Canada have taken an extended scope of practice to enable physiotherapists to work more broadly in health delivery settings, whilst giving recognition of the skills, expertise, qualifications and years of experience gained. The argument for an advanced

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<sup>1</sup> Williams, A. H., Stotter, G., Hefford, C., Warren, J., & Darlow, B. (2019). Impacts of advanced physiotherapy: A narrative literature review. *New Zealand Journal of Physiotherapy*, 47(3), 150-159. <https://doi.org/10.15619/NZJP/47.3.03>

<sup>2</sup> WCPT Policy Statement: Advanced Physical Therapy Practice Accessed from <https://www.wcpt.org/policy/ps-advanced-pt-practice>

<sup>3</sup> Elective Care Transformation NHS England 2017 Transforming musculoskeletal and orthopaedic elective care outcomes Accessed from: <https://www.england.nhs.uk/wp-content/uploads/2017/11/msk-orthopaedic-elective-care-handbook-v2.pdf>

<sup>4</sup> Reid, A. Dixon, H. (2018) Analysis of the Physiotherapy Workforce December 2018 BERL Accessed from <https://pnz.org.nz/workforce>

<sup>5</sup> Reid, A. (2019) Physiotherapy: Workforce Attrition and Retention BERL Accessed from <https://pnz.org.nz/workforce>

practitioner scope of practice prior to an extended scope may fit the current New Zealand context. We would note that in future years should transdisciplinary models of care become standard practice, there may be a need to consider an extended scope.

PNZ is conscious that funders such as the Ministry of Health and ACC, have signaled the desire for physiotherapists to be able to work in transdisciplinary ways which also aligns with an extended scope of practice. A number of District Health Boards (DHBs) across the country have developed allied health career frameworks that are enabling physiotherapists to work in transdisciplinary settings.

Other local examples of professions who have preferred to adopt extended scopes of practice, rather than advanced practitioner scopes of practice include nurse practitioners and pharmacists.

### **3. Is Advanced Physiotherapy Practitioner a suitable title for this Scope of Practice?**

While the Advanced Practice Physiotherapist title is consistent with other health practitioners titles PNZ does not recommend using the APP acronym as this may have little meaning for the public. As with the Specialist title, we would recommend this is not shortened but used in full.

PNZ notes a number of DHBs have developed a physiotherapy career framework using an Advanced Practitioner title within that framework.

### **4. Do you agree with the proposed qualification and experience criteria?**

PNZ recommends reconsideration of the proposed qualification and experience criteria.

#### **Further comment on criteria:**

We are concerned that for the Advanced Practice Physiotherapist role to meet both the desire to achieve improved public safety (through better access to effective treatment) and the workforce goal of a career pathway, the qualifications and experience criteria need to be viewed as accessible and achievable. We are conscious that the career pathway is not the primary concern of the Physiotherapy Board, but it is for physiotherapists who might want to work towards a titled scope.

The Physiotherapy Board workforce survey in 2019 showed 13 per cent of APC holders had gained a Masters degree while 39.9 per cent had a postgraduate diploma or certificate. By accepting Masters only rather than postgraduate diploma, the “bar” may be set too high for many physiotherapists and therefore seen as unattainable by most. A Masters degree is the same level of qualification for entry to Specialist title. We appreciate the argument for Masters qualification being the level at which a practitioner has demonstrated independent research skills.

The physiotherapy workforce is predominately female (77 per cent) with a large percentage of the workforce working part time (34 per cent). There have been concerns raised by some PNZ members that the criteria may limit potential career progression for the workforce and risk creating further inequalities.

PNZ believes that affirmative action may be required to make the titled scopes attractive to Māori physiotherapists. Māori currently make up 5.4 per cent of the workforce. Recruitment of Māori practitioners is a recognised challenge for the workforce. The ability for members of the public to find titled Māori physiotherapists has the potential to both enhance health outcomes for Māori and improve the attractiveness of physiotherapy as a career for young Māori. For the profession to reduce the health inequities experienced by Māori and to uphold and reflect the 2019 Waitangi Tribunal Treaty Principles in relation to the health kaupapa claim<sup>6</sup> (Wai 2575), consideration should be given to developing an Advanced Practitioner endorsed for Māori cultural competence

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<sup>6</sup> Hauora: Report on Stage one of the Health Services and Outcomes Kaupapa Inquiry Wai 2575 Waitangi Tribunal Report 2019. Chapter 3 pp27-34. Downloaded from [www.waitangitribunal.govt.nz](http://www.waitangitribunal.govt.nz)

We note that some groups within New Zealand currently have an advanced practitioner option – including the DHB career pathway and members of the former New Zealand College of Physiotherapy. We appreciate the grandparenting for former College of Physiotherapy members. It would be good to consider the ramifications of protecting the Advanced Practice Physiotherapist title for the DHB employed physiotherapists and other groups who already use this, or a similar, title.

We note that the use of Specialist in relation to physiotherapists has been a challenge to change despite the gazetting of the protected title in 2012. Educating the profession and enforcing the titles will be essential. We would be keen to work with the Physiotherapy Board to educate the profession on the implementation of a regulated Advanced Practice Physiotherapy scope with the groups and individuals who currently use the Advanced Practitioner title.

**5. Do you agree with the proposed Advanced Practice Physiotherapist roles and key competencies?**

We appreciate the work done by the working party to develop the roles and competencies and to mark clearly the progression from general scope, through Advanced Practice Physiotherapist to Specialist. There has not been a lot of feedback about this issue. The differentiations proposed appear to represent and are similar to DHB Career Pathway Frameworks where there is more recognition of experience and additional expertise as well as acknowledging that the title 'Specialist' is a protected scope of practice.

**6. Do you agree with the proposed Advanced Practice Physiotherapist assessment process?**

PNZ largely agrees with this. We recognise that cost recovery is an important issue for managing the assessment process. PNZ recommends that the Physiotherapy Board consider the use of on-line filing and documentation to help manage the cost of developing a scope of practice or career framework.

**7. Do you agree with the alignment of the proposed revised General and Specialist Scopes to the proposed Advanced Practice Physiotherapist Scope of Practice?**

As noted above, there may be some revision required if/when there is a need for physiotherapists working in an extended scope. There is a tension between an advanced scope of practice being primarily clinical experience and skill compared to a step between general and specialist scope with a more academic slant.

**8. Do you have any additional comments about the proposed Advanced Practice Physiotherapist Scope?**

PNZ is aware of the broad range of views of its members and that there is not a unanimous view, however the responses and comments made are reflective of the comments heard from members and the research undertaken on our members' behalf by the PDC.

PNZ members are conscious that it has taken some years for funders, such as ACC, to reflect the value of the Specialist scope in its funding arrangements. We hope that funders including the Ministry of Health and ACC will recognise the Advanced Practice Physiotherapist. Such recognition would help demonstrate the benefit to the public safety and to the profession.

Thank you for the opportunity to submit on this matter.  
The primary contact for matters relating to this submission is:

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Yours sincerely,

A handwritten signature in black ink, appearing to be 'Liz Binns', with a stylized flourish at the end.

Liz Binns  
President