



CPTBC

College of Physical Therapists
of British Columbia

Supervision Guide

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Supervision Guide

Contents

- Introduction 2
- Purpose of This Guide 2
- Why is Supervision Needed?..... 2
- Who is Accountable for Client Care? 2
- Supervision Models..... 3
 - Student Registrants..... 3
 - Registration 3
 - Supervisors of Student Registrants 3
 - College Requirements 4
 - Physical Therapist Support Workers (PTSW) 5
 - Supervisors of PTSWs..... 5
 - College Requirements 5
- What does all this mean?..... 6

Introduction

The Bylaws of the College describe student registrants and full registrants.

- **Student registrants** are learners in an entry-to-practice physical therapy education program who are completing supervised clinical practice hours as part of the program's requirements. They may provide physical therapy services only under the supervision of a full registrant.
- **Full registrants** make up the majority of physical therapists in BC. They are registered to practice without supervision and can supervise student registrants.

Physical therapists (full registrants and student registrants) also supervise unregulated healthcare team members such as physical therapist support workers (PTSWs). Any unregulated individual providing physical therapy services under the supervision of a physical therapist is a PTSW. These individuals are trained in very different ways (formally or informally). They can be called rehabilitation assistants, physical therapist assistants, or therapy assistants, and some PTSWs are kinesiologists or have different educational backgrounds including formal assistant training. Regardless of background, if unregulated individuals are providing physical therapy services under the supervision of a physical therapist, they are considered to be PTSWs by the College.

Purpose of This Guide

Full registrants are often asked to act as supervisors for student registrants. Full registrants and student registrants often assign tasks to PTSWs and supervise the physical therapy services provided by PTSWs. This guide has been developed to assist all physical therapists better understand the College regulations, Standards of Practice, and expectations around supervision. It also clarifies the similarities and differences between the two supervision models.

Why is Supervision Needed?

Supervision of student registrants is used to protect the public and instill public confidence in physical therapy service delivery during a period of licensure when a student registrant has not yet met all of the requirements of their entry level physical therapy academic program. Supervision also facilitates the ongoing development and application of physical therapy competencies by those who have not yet formally demonstrated entry-level competence.

Supervision of unregulated members of the healthcare team such as PTSWs ensures the provision of safe, quality client care. Standards set boundaries that define what tasks can be assigned to PTSWs and how those tasks must be monitored, progressed, and documented.

Who is Accountable for Client Care?

Physical therapists (full registrants and student registrants) are responsible for safe, accountable practice and public safety during the provision of physical therapy services in supervised practice. The supervising physical therapist provides oversight and monitors the quality of the care provided, but the student physical therapist is also responsible for the care they themselves provide. The supervising physical therapist is required to evaluate the competence and performance of the student registrant and ensure safe practice. Likewise, the student registrant must be aware of the limits of their individual competence when providing care and seek support and input from their supervisor whenever required.

Physical therapy support workers are not regulated healthcare providers. Therefore the supervising physical therapist is the one who is primarily responsible for the quality of care and the safety of the physical therapy services provided. The physical therapist is also responsible for the care assigned, the appropriateness of that assignment, and to monitor the PWSW's performance of that task.

Supervision Models

Student Registrants

Registration

Any student (whether from the Master of Physical Therapy [MPT] program at UBC, another Canadian entry-to-practice education program, or a recognized education program outside of Canada) must apply for and be granted student registration by the College prior to beginning clinical placements involving direct client care in British Columbia (Bylaws, Part 4 [45]). There is no fee to become a student registrant, but each student registrant must provide proof of malpractice insurance (Canadian education programs arrange this for their own students) with their application.

Supervisors of Student Registrants

Only full registrants in good standing can supervise a student registrant completing a clinical placement in British Columbia, and they must adhere to the requirements described in *Standard of Practice: Supervision*. UBC calls these supervisors "Clinical Educators" and provides more information for physical therapists interested in this role at [this link](#).

College Requirements

The supervisor/clinical educator must:

- Assess the level of competence of the student registrant. The student's level of competence should be established by observation of their skills, while considering the theoretical knowledge they have learned and the number of clinical placements they've previously completed.
- Ensure that the clients assigned to the student are appropriate to receive services from the student.
- Ensure that clients who will receive physical therapy services from a student registrant provide informed consent for service delivery by a student and that the consent is documented.
- Only assign client care tasks to the student that the supervisor is also competent to perform.
- Provide the direct and indirect supervision appropriate to the student's competence to ensure client safety and the safe provision of physical therapy services.
- Maintain ongoing communication with the student registrant.
- Ensure the student documents in the clinical record in accordance with College requirements by reviewing and countersigning their documentation
- NOT allow a student to perform dry needling (this act is limited to full registrants who have dry needling as an additional skill on their College profile)
- Ensure that student supervision is reassigned if the supervisor is absent/on vacation/not available to supervise.

Physical Therapist Support Workers (PTSW)

Supervisors of PTSWs

Full registrant and student registrant physical therapists can supervise PTSWs in adherence to the requirements described in *Standard of Practice: Supervision*. The supervising physical therapist is primarily responsible and accountable for the quality of care and the safety of the physical therapy services provided.

College Requirements

The supervisor must:

- Obtain informed consent from clients who will receive physical therapy services from a PTSW (and document the consent).
- Only assign tasks to the PTSW that the supervisor is also competent to perform.
- Conduct a risk assessment based on the *Decision Making Tool* to ensure task assignment has taken into consideration any risk factors.
- Assess the level of competence of the PTSW with respect to every task being assigned.
- Establish ongoing communication with the PTSW.
- Conduct initial and ongoing client assessments.
- Monitor progress and modify the treatment plan as necessary.
- Monitor and evaluate the physical therapy services provided by the PTSW.
- Provide the necessary direct and indirect supervision to ensure client safety and the safe provision of physical therapy services.
- NOT assign the following tasks:
 - Any portion of dry needling
 - Interpretation of referrals, diagnosis, prognosis, or assessment findings)
 - Determination of treatment and treatment goals
 - Planning, development or modification of treatment plans beyond set parameters.
 - Discussion of treatment rationale, clinical findings, a, prognosis, intervention plan with a client
 - Discharge planning
 - Higher risk activities that require ongoing or continuous clinical judgement
- Complete documentation in the clinical record as required in the *Standards of Practice: Documentation* and the *Standard of Practice: Supervision*.

What does all this mean?

Here are some specific questions that the College receives, related to supervision. The answers may help to clarify the similarities and differences between each supervision model.

Question	Supervision of a Student Registrant	Supervision of a PTSW
Do I have to co-sign the supervisee's notes in the clinical record?	<p>Co-signing of all chart notes written by students is required.</p> <p>Recognize that co-signing indicates that you have reviewed the note AND that you agree with its content – be sure you can verify the assessment and appropriateness of the treatment plan.</p>	<p>Some workplaces require the PTSWs to document in the clinical record and some don't. Because PTSWs are unregulated health professionals, there are no standards for PTSW documentation. Some supervisors use the clinical record as part of their communications plan with the PTSW, but there is no need to co-sign their chart entries.</p>
Can the supervisee work alone, such as on weekends or evenings when I am not there?	<p>A student's clinical educator should be working on the days that the student is present. If the clinical educator is absent, an alternate supervisor (another physical therapist) should be identified, or alternative arrangements should be made such as observing another healthcare professional onsite or offsite.</p>	<p>As the supervisor responsible for physical therapy services, you must provide indirect supervision and be readily available at all times via phone or another (e.g. electronic) means when not providing direct supervision.</p> <p>You should use your clinical judgement to determine whether a PTSW can work without your <u>direct</u> supervision on evenings or weekends. Your decision will vary depending on the competence of the PTSW and the complexity of the clients and the tasks assigned. You should also assess the level of risk.</p> <p>If you have determined that you don't need to provide the PTSW with <u>direct</u> supervision, remember that you as the supervisor must provide <u>indirect</u> supervision and be readily available at all times via phone or another (e.g. electronic) means – weekends and evenings – whenever the PTSW is providing physical therapy services under your supervision.</p>

Question	Supervision of a Student Registrant	Supervision of a PTSW
		An alternative is to transfer supervisory duties to another full registrant who is working at that time.
If a supervisee makes a mistake, who is responsible/ accountable?	Both the student registrant and you as the supervisor are responsible and accountable for client care. As the supervisor, you are monitoring their practice and ensuring they are practising within the limits of their individual competence when providing care. As regulated health professionals, it is also the responsibility of the student registrant to recognize when they might exceed their own limits and to seek support and input from their supervisor whenever required.	<p>As the supervisor of an unregulated health professional providing physical therapy services, you are responsible and accountable for client care.</p> <p>In the event of an adverse outcome, you will need to be able to demonstrate that you adhered to the College’s legislation and appropriately assigned the task in question. You cannot control for every eventuality, but your clinical decision-making process would be reviewed and you should be prepared to describe the steps you took when assigning the task.</p>
Can a supervisee issue a receipt for physical therapy services independently?	<p>No, student registrants cannot issue a receipt independently.</p> <p>You can issue a receipt for physical therapy services provided by a student registrant using your own College registration number because you, as the supervisor, can verify that you were actively involved in the client’s care. The student registrant’s name is not required on the receipt.</p>	<p>No, PTSWs cannot issue a receipt independently. <i>Standard of Practice: Funding, Fees and Billing</i> requires that invoices/receipts are transparent, justifiable and clearly communicated.</p> <ul style="list-style-type: none"> • When the PTSW alone provided billable physical therapy services under your supervision on a given day, both names (yours and that of the PTSW) must be indicated on the receipt (e.g. “Physical therapy services provided by <i>Their Name</i>, PTSW, supervised by <i>Your Name</i>, PT.”) • When physical therapy service delivery is shared between you and the PTSW on a given day, then it is acceptable to indicate only your name on the receipt.

Question	Supervision of a Student Registrant	Supervision of a P.T.S.W.
		<p>Note that some third party payors will not reimburse clients for services provided by P.T.S.W.s, so be sure to have your client check with their insurance provider in advance to avoid this situation.</p>
<p>Can supervisees provide physical therapy services alone in the community, such as at a client’s home or at the community pool with a group of clients?</p>	<p>As a supervisor of any student registrant who is going to assign any task to a P.T.S.W., you must ensure that:</p> <ul style="list-style-type: none"> • the student is competent to perform that task themselves (i.e. in this case, administer the outcome measure) • the student has determined that the P.T.S.W. is competent to perform the task • the student does not assign the task of interpreting the results of an outcome measure or of developing/modifying an intervention plan based on the results • the student understands their supervisory responsibilities and adheres to <i>Standard of Practice: Supervision</i> 	<p>This will vary depending on the competency of the P.T.S.W. You will have assessed their level of competence; the type of supervision (direct or indirect) they require to provide safe physical therapy services will depend on whether you, as the supervisor, feel the P.T.S.W. is ready to practice without direct supervision. Working in the community or alone introduces a higher level of risk and your decision making process and risk assessment when assigning the task(s) should reflect this.</p> <p>Remember that you as the supervisor must provide <u>indirect</u> supervision and be readily available at all times via phone or another (e.g. electronic) means when not providing direct supervision.</p>
<p>What is my responsibility to the College? Do I need to submit supervisory reports?</p>	<p>The College does not require you to submit supervisory reports related to student registrants. However, the student’s education program will require evaluation of the student’s competence, typically at the midpoint and at the end of the</p>	<p>No supervisory reports are required by the College regarding the work or the supervision of a P.T.S.W. However clear documentation in the client’s clinical record about the assignment of task by the physical therapist is always required, in adherence with the College’s Standards of Practice.</p>

Question	Supervision of a Student Registrant	Supervision of a PTSW
	clinical placement (and more frequently if there are concerns).	
How long do I need to supervise?	You are responsible to supervise the student registrant throughout the clinical placement. If you are unable to do so, then you must communicate with the Clinical Placement Officer at UBC regarding an alternate supervision plan. If the placement was not coordinated with UBC then you must contact the College.	You are responsible to supervise the PTSW at all times when they are providing physical therapy services under your direction.
What if I go on vacation or am absent?	Student registrants must be supervised throughout their placement. If you will be absent for any time at all during the placement, you must communicate with Clinical Placement Officer at UBC regarding an alternate supervision plan, or an alternate supervisor. If the placement was not coordinated with UBC then you must contact the College. This is especially important if there are performance concerns.	<p>You must make arrangements for supervision of the PTSW by another physical therapist at any time when you are not available to provide appropriate supervision.</p> <p>This includes weekend and evening service if the PTSW is working and you are not working, even for clients familiar to the PTSW.</p> <p>If you leave your position at a workplace where the PTSW is providing physical therapy services under your supervision, you must advise your clients and your employers that the PTSW cannot continue to provide physical therapy services until a new supervisor is in place. This is especially important when the physical therapist leaves a sole-charge position.</p>

Question	Supervision of a Student Registrant	Supervision of a PTSW
Can a student registrant assign the task of completing outcome measures to a PTSW?	<p>As a supervisor of any student registrant who is going to assign any task to a PTSW, you must ensure that:</p> <ul style="list-style-type: none"> • the student is competent to perform that task themselves (i.e. in this case, administer the outcome measure) • the student has determined that the PTSW is competent to perform the task • the student does not assign the task of interpreting the results of an outcome measure or of developing/modifying an intervention plan based on the results • the student understands their supervisory responsibilities and adheres to <i>Standard of Practice: Supervision</i> 	<p>As a supervisor of a PTSW, it is up to you to determine what to assign to the PTSW, depending on their level of competence.</p> <p>Task assignment can include the completion of measurement or rating activities if you have determined that the PTSW is competent to complete the task accurately.</p> <p>However, it is your responsibility to interpret the results of the outcome measure and determine how treatment will be influenced by the results. Remember that there is interpretation inherent in the observations made during the administration of many if not most outcome measures which should be taken into consideration.</p>
Can supervisees perform dry needling?	No, not even under direct supervision.	
What if we (myself or a student registrant) are only acting in a consultation role, providing recommendations to	If you are working consultatively (as a full registrant or student registrant), you must document your consultation and your recommendations (as well as any training you provided to a care provider or care staff). However, because your involvement with a client ends with that consultation, the care provider or care staff are not working under your supervision, and therefore you are not assigning a task to them or supervising them in the implementation of the recommendations you provided. Since PTSWs only provide physical therapy services under the ongoing supervision of a physical therapist, if you are	

Question	Supervision of a Student Registrant	Supervision of a PTSW
<p>a care provider rather than providing ongoing intervention? Do we still need to assign the task of implementing those recommendations to the care provider, and supervise that person?</p>	<p>working in a consultative role rather than providing ongoing physical therapy services, you would not be assigning tasks to a PTSW.</p>	
<p>What if there are two supervisors supervising a student registrant or a PTSW, either at the same workplace or at different workplaces?</p>	<p>This is not an unusual situation. Sometimes clinical placement hours for students are split between two clinical educators at the same workplace or at different workplaces. PTSWs often work under the supervision of several physical therapists (and sometimes also occupational therapists) who assign different tasks for the same or different clients. A higher level of risk exists if it is unclear to the supervisee who is responsible for supervising a particular client’s care. Whenever possible, supervisors should connect about shared supervisory responsibilities and about the competence of the supervisee, and collaborate to develop a clear supervision and communication plan with them.</p>	

Question	Supervision of a Student Registrant	Supervision of a PTSW
<p>What should I be documenting in the clinical record about my supervision?</p>	<p>Your documentation should be clear enough to demonstrate your clinical decision-making with respect to risk assessment, student competence, the level of supervision you provided (and why), and how you have ensured that they were providing safe, competent physical therapy services.</p> <p>The client record should always be in compliance with what is outlined in <i>Standard of Practice: Documentation</i>, including identification of the service provider, and in <i>Standard of Practice: Supervision</i>, including documentation of the client’s informed consent to receive physical therapy services from the student registrant, and details about the communications plan between the two of you.</p> <p>Always think about what might happen in the case of an adverse outcome, and how your documentation needs to support the choices you’ve made throughout physical therapy service delivery to a client.</p>	<p>When working with a PTSW, the supervisor is expected to document in the client record the tasks assigned to the PTSW, and ensure that the record identifies the provider of physical therapy services on each day they are provided, including by the PTSW. These requirements are described in <i>Standard of Practice: Documentation</i>.</p> <p>Additionally, <i>Standard of Practice: Supervision</i> requires documentation of the client’s informed consent to receive physical therapy services from the PTSW, and the details about the communication plan between you.</p> <p>Always think about what might happen in the case of an adverse outcome, and how your documentation needs to support the choices you’ve made throughout physical therapy service delivery to a client.</p>

Question	Supervision of a Student Registrant	Supervision of a PTSW
Can I offer to supervise someone that I am related to, or who is a close personal friend?	It is not advisable to supervise a student registrant who is close to you. This creates a potential, perceived, or actual conflict of interest and could result in a lack of objectivity when providing supervision or when evaluating the student registrant's performance.	It is not advisable to supervise a PTSW who is close to you. This creates a potential, perceived, or actual conflict of interest. This could result in a lack of objectivity when providing supervision, and put into question your clinical judgement in the event of an adverse outcome.
Whose responsibility is it to obtain client consent for a supervisee to provide physical therapy services?	<p>The supervising physical therapist (the clinical educator) must obtain and document a client's informed consent for the delivery of services by student registrants.</p> <p>Note that it is the student registrant's responsibility to ensure the client's informed consent for treatment on an ongoing basis.</p>	It is the responsibility of the supervisor to obtain and document client consent for a PTSW to provide physical therapy services under the physical therapist's supervision.