Response to the letter from the Bulgarian Association (BAPT)
18/07/2014

Dear Colleagues from Bulgaria,

After reviewing your letter explaining the situation of the Physiotherapy profession in your country, we would like to give you some responses, information and proposals to try to improve the situation.

We identify three main topics to address:
1. Professional title and classification of the physiotherapists
2. Scope of practice – skills and competences
3. Education

1 - Professional title and classification of the physiotherapists

According to the information provided by the Bulgarian authorities to the EU Commission, there are two titles in use for the profession of physiotherapist.

1 - Кинезитерапевт translated in English as kinesitherapist - Qualification level:
   PS4 - Diploma of post-secondary level (exactly 4 years)

2 – Рехабилитатор translated in English as Rehabilitation specialist - Qualification level: PS3 - Diploma of post-secondary level (3-4 years)

http://ec.europa.eu/internal_market/qualifications/regprof/index.cfm?action=profession&id_profession=1250

In our opinion only the first title fits the whole scope of practice a Physiotherapist is expected to deliver / provide.

The European Region of the World Confederation for Physical Therapy (ER-WCPT), which is recognised by the European Commission and the European Council of the European Union as an official consulting body to the EU authorities on all matters concerning the physiotherapy profession as a Health Care Profession and physiotherapists as health care professionals, defines a Physiotherapist as follows:

A Physiotherapist is an autonomous health care professional who assesses, diagnoses, plans, treats and evaluates clients/patients and is responsible for his/her own actions.

A Physiotherapist has their own caseload of clients/patients with complex needs and practices within complex and increasingly unpredictable contexts. A Physiotherapist practices according to professional codes of practice and conduct. A Physiotherapist has completed a minimum of Bachelor of Science Physiotherapy education programme, or equivalent, which is recognised by the state to practice physiotherapy.
National Classification and European Classification of occupations

Furthermore, and related to the classification of health occupations, we would like to inform you of the European Union developments that may affect national classification.

The European Commission, through its Directorate General (DG) for Employment is leading an initiative named: ESCO – European Skills Competences and Occupations. This project is developed in close collaboration with DG Internal Market and DG for Health (SANCO). To develop this project sectorial reference groups have been created. There is one group for Healthcare and Social Services. The ER-WCPT General Secretary is the chairman of this group. The first step for this project is a classification on health occupations and definitions for each of them. Physiotherapy is one of the domains listed and has been classified as follows:

The classification for Physiotherapy (Physical Therapy also in EN) related occupations:
• Physiotherapist Assistant
• Physiotherapist
• Advanced Physiotherapist

Besides the definition for a Physiotherapist, above, the other two occupations are defined as follows.

Physiotherapist Assistant
A physiotherapist assistant assists and works under the sole direction and supervision of the Physiotherapist who delegates specific aspects of interventions. A physiotherapist assistant only works within defined contexts using agreed treatment protocols and procedures. A Physiotherapist assistant is responsible to the Physiotherapist.

Physiotherapist
A Physiotherapist is an autonomous health care professional who assesses, diagnoses, plans, treats and evaluates clients/patients and is responsible for his/her own actions.
A Physiotherapist has their own caseload of clients/patients with complex needs and practices within complex and increasingly unpredictable contexts. A Physiotherapist practices according to professional codes of practice and conduct. A Physiotherapist has completed a minimum of Bachelor of Science Physiotherapy education programme, or equivalent, which is recognised by the state to practice physiotherapy.
**Advanced Physiotherapist**

An Advanced Physiotherapist is a Physiotherapist who has formally demonstrated an ability to apply advanced competence (knowledge, skills and attitudes) in a defined area, within the scope of practice recognised as physiotherapy. An Advanced Physiotherapist has highly specialised skills to address complex decision-making and manage risk in unpredictable contexts, which demands innovation. An Advanced Physiotherapist has completed an advanced programme or can demonstrate he/she can work at an advanced level, focusing on a specific area of clinical practice, education, research, or professional management among others.

Furthermore, the physiotherapists are listed at the same level as doctors or other healthcare professionals and, according to the definition of an Advanced Physiotherapist, can work as managers in hospitals.

**2 - Scope of practice – skills and competences**

In your letter, you reported that at *The VI Congress (2011) attended by Emma Stokes, Vice President of WCPT, and Johnny Kuhr, Coordinator of ER-WCPT. They explained to the Congress that physiotherapists are an autonomous health profession that fulfil its professional skills following a clinical diagnosis by a specialist physician.*

The ER-WCPT and its MOs do not accept this statement. We understand the scope of practice of a physiotherapist is as follows:

**Professional autonomy**

Physiotherapy is an autonomous and independent health profession whose practitioners work in an open and equal professional relationship with medical doctors and other health professionals. They work in both the public and the private sectors, in hospitals, rehabilitation centres, residential care facilities, clinics, schools and work settings.

Physiotherapists are directly responsible for their actions, from assessment to the performance and evaluation of their interventions. Physiotherapists are also directly responsible for all interventions prescribed by a medical practitioner and have the right to refuse to perform any intervention, on professional and safety grounds, even if prescribed by a medical practitioner. Physiotherapists are involved in prevention programmes, health education and research.

In all the countries of the European Union physiotherapists have generally moved from a stage of dependence on prescribing by medical practitioners...
to autonomous practice. The level of autonomy can vary from direct access to physiotherapy to access by medical referral.

The norm is that, where a medical referral is needed, the physiotherapist is left free to decide the intervention modalities.

3 - Physiotherapy Education in Europe
At European Union level the basic (initial) education of physiotherapists is part of the Higher Education System, and the duration is 3 years or longer in the majority of the member states. The ER-WCPT has a policy to facilitate free migration of physiotherapists at European level, based on principles and recommendations approved at the General Meeting of the WCPT, from which we would like to highlight the following key points:

• Education for entry-level physiotherapists must be based on university or university-level studies, of a minimum of four years, independently validated and accredited as being at a standard that accords graduate full statutory and professional recognition.
• The first professional qualification should represent completion of a curriculum that qualifies the physiotherapists for practice as an independent professional.
• An integral component of the curriculum for the first professional qualification is direct clinical experience under the supervision of appropriately qualified physiotherapists. Clinical education will involve gradual access to responsibility as skill and experience grow.
• Basic physical therapy education should be conducted by physiotherapist teachers able to transfer knowledge and skills for the critical analysis of theories and methods of physiotherapy.
• Physiotherapists should be encouraged to undertake post-graduate education in physiotherapy or related fields for advanced professional development.
• The goals, content, format and evaluation of the education programmes provided for physiotherapists are the responsibility of the faculty but should involve the active participation of the national physiotherapy association.

Within this framework, and considering the development of the Bologna Process, in order to build the European Education Area, we would like to call your attention to:
  1. The need of the first cycle of studies to be of four years, at university level, and for the need to plan a second cycle of studies at Master and
or PhD level, including the possibility for specialisation, for physiotherapists;

2. The need for the active involvement of the Federation for Physiotherapists of Romania in the definition of the goals, content, format and evaluation of the education programmes provided for physiotherapists, in cooperation with the academic institutions and the national educational authorities;

3. The need to guarantee the autonomy of the profession, and of the physiotherapists, throughout legislation that consolidates the regulation of the profession and the protection of the title of physiotherapist.

4. The need to support, and stimulate, the development of the scope of practice of physiotherapists, accordingly with the professional standards achieved at European level. (Annex 1)

The ER-WCPT has approved, in June 2003, a benchmark statement regarding physiotherapy education that is a relevant reference tool for curriculum development, and certainly will constitute a solid working basis for the team in charge of that process. (Annex 2)

The ER-WCPT has also approved, in May 2014, an Education Policy. (Annex 3)

The Executive Committee of the ER-WCPT would like to stress the recognition of the quality of the work of the Bulgarian Association, in order to develop the profession, at national level, and of its contribution to the activities of the European Region.

We would like to assure you and confirm that the Executive Committee is fully prepared to cooperate in any initiatives regarding the development of the profession in your country and remains interested in forwarding to you any further information considered necessary. We can also address this letter to the national authorities informing them of the situation in other European Countries.

Yours sincerely

Sarah Bazin
Chairman of the ER-WCPT