



Understanding Delegation

Introduction: This article was prepared for kinesiologists to help better understand delegation or performing activities/services (acts) on behalf of a regulated health professional in BC and to better understand the requirements and limitations on the kinesiologist's ability to delegate.

Background: It has been brought to BCAK's attention that there have been, and may continue to be, circumstances where kinesiologists are being delegated (supervised) to provide physical therapy (active rehabilitation or other therapy services) by a BC registrant of the College of Physical Therapists of BC (CPTBC) for WorkSafe BC and the Ministry of Children and Family Development (MCFD) and where kinesiologists have delegated medically supervised exercise to personal trainers or others who are not competent or insured to work with medically supervised clientele.

Kinesiologist as the Delegate (Supervisee)

The delegation of health-related services requires the delegating professional (DP) to follow the requirements of their respective regulatory college. In terms of physical therapy, this requires the physical therapist to be accountable for the client care being provided, including requirements for supervision and record keeping.¹ This will apply similarly to other regulated health professionals who delegate kinesiologists to perform work on their behalf. The supervision requirement may dictate the delegate be under the direct supervision of the DP in the same location at the time services are delivered based on the level of risk or other factors, or from a different location. Regardless of which scenario applies, the DP must complete chart notes for each session and include other details relevant to the treatment provided.² In addition, the service funder (payer) may require they be made aware of, or provide pre-authorization for, service to be provided by a delegate and the credentials or competency of the delegate.

What this means to the kinesiologist:

- 1) When a service (act) is delegated to the kinesiologist they are limited to performing acts that can be legally delegated to them, that the act is within their scope of practice, and that they are competent to perform the act.
- 2) Regardless of the location of service delivery, the DP must perform record keeping tasks as defined by their regulatory college. The kinesiologist can provide supplemental record keeping (chart) notes, provided the notes are separate and identifiable as being completed by the delegate.
- 3) The billing must detail the service being provided as that of the DP and be paid to them or their employer and then they, or the employer, would remunerate the delegate for the work performed.

Various working relationships may make this process difficult to assess, particularly when independent or sub-contractors are utilized as delegates. This makes it all the more important to be informed of the limitations and requirements of the DP, along with assessing your own competency to perform the delegated act(s).

¹ [Assigning Tasks to a Physical Therapy Support Worker \(PTSW\)](#)

² [CPTBC- Standard 8 – Documentation & Record Keeping](#)



Kinesiologist as the Delegator (Supervisor)

The ability of BCAA Practicing member kinesiologists to delegate acts to others is limited to specific situations or circumstances, particularly when dealing with clinical populations.

General guidelines include the following:

Practicing members may delegate (supervise) rehabilitation assistants (additional insurance rider and fee of \$25 is required under the BCAA member group professional liability insurance policy) and students enrolled in a post-secondary degree program who are completing practicums, placements, internships or Co-op work integrated learning placements. Practicing members may not delegate medically supervised exercise prescription to personal trainers or other individuals who are not BCAA Practicing members even if they have completed training to work with clinical populations.

Practicing members must also:

- 1) Assess the competency of a delegate and be satisfied that they are competent to perform the acts being delegated.
- 2) Directly supervise the delegate during delivery of the act(s) unless the delegate is properly trained as a rehabilitation assistant (i.e. completed a government recognized rehabilitation assistant training program).
- 3) Perform record keeping (charting) for all client sessions in accordance with the Professional Practice Standards³ including:
 - a. Recording of client consent for delegation of act(s)
 - b. Recording of the name of the delegate and statement attesting to the competency of the delegate
 - c. Recording of the interventions used, the outcome of the interventions and initial any supplemental entries made by the delegate to the client record.

Reminders:

Practicing members are not permitted to delegate:

- 1) professional record keeping requirements to a student unless the student is also a Practicing member of the BCAA.
- 2) acts to personal trainers or other persons not indicated.

³ https://bcak.bc.ca/documents/193/08-2021_BCAA_Professional_Practice_Standards.pdf