## IN THE MATTER OF A HEARING BEFORE THE HEARING TRIBUNAL OF THE COLLEGE OF PHYSIOTHERAPISTS OF ALBERTA

into the conduct of Marjorie Musni, Registration No. 7280 pursuant to the Health Professions Act, RSA 2000, c H-7

## NOTICE OF HEARING AND NOTICE TO ATTEND AS WITNESS

## TO: MARJORIE MUSNI

**TAKE NOTICE THAT** on a October 30, 2025 in the City of Edmonton, in the Province of Alberta, commencing at 9:00 a.m. by Zoom Video Conference, a Hearing Tribunal of the College of Physiotherapists of Alberta (the "College") will conduct a hearing into allegations that you engaged in unprofessional conduct while employed at a physiotherapy clinic in Red Deer, Alberta (the "Clinic"), in that:

- 1. On or about January 16, 2023, you failed to perform dry needling in a competent manner to Patient GA, the particulars of which include:
  - a. you assigned the monitoring and removal of dry needles from Patient GA's body to an unregulated person and physiotherapy support worker, Ms. JD;
  - b. you left the Clinic shortly after inserting dry needles into Patient GA's body;
  - c. you were not physically present in the Clinic when the dry needles were removed from Patient GA's body by Ms. JD;
  - d. you did not document the administration and/or removal of dry needles, including the number of needles inserted in Patient GA's body, prior to assigning the removal of the dry needles to Ms. JD.
- **2.** Between January 17, 2023 and February 7, 2023, you failed to adequately respond to an adverse event (a needle embedded in Patient GA's arm/shoulder area), the particulars of which include:
  - a. you did not document a telephone call with Patient GA where she advised you that she found a needle embedded in her arm/shoulder area, despite it being an adverse event arising from your physiotherapy services;

b. on January 18, 2023 with further modifications on February 2, 2023, you prepared your chart note for the January 16, 2023 appointment with Patient GA after you were aware of an adverse event arising from your physiotherapy services.

**IT IS FURTHER ALLEGED THAT** your conduct constitutes "unprofessional conduct" as defined in s. 1(1)(pp)(i), (ii), and (xii) of the *Health Professions* Act, R.S.A. 2000, c. H-7 (the "HPA"). In particular, it is alleged that:

- 1. Dry needling is a restricted activity as defined by section 1.3 of the *HPA* and governed by the *Physical Therapist Profession Regulation*, AR 64/2011 (in force between May 2011 and April 2023).
- 2. Your conduct breaches one or more of the following:
  - a. Code of Ethical Conduct for Alberta Physiotherapists: Responsibilities to the Client (A12, A13, A14, A15, C3);
  - Standards of Practice for Physiotherapists in Alberta: Performance of Restricted Activities (2017), and, with consideration to, the Supervision Guide for Alberta Physiotherapists (June 2021);
  - c. Standards of Practice for Physiotherapists in Alberta: Client Assessment, Diagnosis, Interventions (2017);
  - d. Standards of Practice for Physiotherapists in Alberta: Documentation (2017).

**AND FURTHER TAKE NOTICE** that pursuant to section 72(1) of the HPA you are required to attend at the said time and place in person, and you are compelled to give evidence and produce models, charts, documents, papers, notes, records, and other material relevant to the Hearing Tribunal.

**AND FURTHER TAKE NOTICE** that in the event that you do not attend at the said time and place, the Hearing Tribunal may proceed in your absence pursuant to section 79(6) of the HPA and you will not be entitled to any further notice of the proceedings.

**AND FURTHER TAKE NOTICE** that in the event you do not attend at the said time and place, your failure to comply with the Notice to Attend may result in a further complaint and may constitute unprofessional conduct.

**DATED** at the City of Edmonton, in the Province of Alberta, 28 day of August, 2025.

X John O'ROS

Haylee O'Reilly Hearings Director Signed by: Haylee O'Reilly