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Deutsche Sozialversicherung
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Feedback from German Social Insurance issued 24 March 2026

Delegated Act of the Commission establishing a Common
Training Framework for the profession of physiotherapist

The European Commission plans to adopt, in the third quarter of 2026, a delegated act introducing a common training framework for physiotherapists (CTF). The objective is to establish a harmonised training framework that facilitates the mutual recognition of professional qualifications within the European Union. The legal basis is Article 49a of Directive 2005/36/EC on the recognition of professional qualifications.

The German Social Insurance (DSV) explicitly welcomes the European Commission's initiative to develop a common European training framework for the profession of physiotherapist. A harmonised training framework can make a significant contribution to simplifying recognition procedures, promoting workforce mobility, and strengthening the quality of physiotherapy care across Europe. At the same time, such a framework can help improve the security of supply in the physiotherapy sector and further strengthen the European internal market for health professions.

The DSV considers that a standardised level of training can accelerate and harmonise recognition procedures within the EU internal market. This would reduce administrative burdens for national authorities and health insurance funds, increase transparency and comparability of qualifications, and facilitate access for foreign professionals to the German healthcare system. This could also contribute to alleviating the existing shortage of skilled workers. In Germany, more than 212,000 physiotherapists are currently employed, while demand for physiotherapy services continues to rise. More efficient recognition procedures are therefore of particular importance.

National Specificities in Germany

In Germany, the professional title "physiotherapist" is currently obtained either through a three-year vocational school training programme or through at least a six-semester Bachelor's degree programme at a higher education institution. Access to vocational training generally requires an intermediate school-leaving certificate (ten years of schooling), while access to higher education requires a university entrance qualification (typically twelve years of schooling).

For certain physiotherapy services, additional specialised training is required. For further qualifications obtained in other EU Member States, the Health Insurance Medical Service ("Medizinischer Dienst der Krankenkassen") currently assesses whether they meet the requirements applicable in Germany. From the DSV's perspective, it is explicitly welcomed if all necessary competencies are integrated into

the initial training in the future, thereby reducing administrative and assessment burdens for health insurance funds.

Consideration of National Education Structures

The DSV considers that the establishment of a common training framework for physiotherapists requires appropriate consideration of existing national differences in education systems. Against this background, the DSV recommends providing for two qualification levels within the European Qualifications Framework (EQF):

- _ EQF level 4 for vocational school training

- _ EQF level 6 for academic training (Bachelor's degree)

This differentiation enables European harmonisation without undermining established national training structures and ensures access to training for the broadest possible group of individuals (e.g. those without university entrance qualifications).

Competence Requirements

Physiotherapists, irrespective of their training pathway, must possess the competencies required to provide evidence-based, effective and efficient treatment across prevention, therapy and rehabilitation. This includes, in particular, a solid foundation of professional knowledge in areas such as anatomy, physiology, pathology, biomechanics, diagnostics and physiotherapeutic treatment methods. Methodological competencies are equally essential, including the ability to plan and manage patient-specific therapies, to work in an evidence-based manner and to cooperate effectively in interdisciplinary settings. In addition, social and personal competencies are of central importance, notably communication skills, the ability to learn, a strong sense of responsibility and the capacity to work independently. These competencies form the basis for high-quality physiotherapy care and should therefore be adequately reflected in a common European training framework.

About us

The German Federal Pension Insurance (DRV Bund), the German Social Accident Insurance (DGUV), the National Association of Statutory Health Insurance Funds (GKV-Spitzenverband), the national associations for statutory health and long-term care insurance funds at the federal level and the Social Insurance for Agriculture, Forestry and Horticulture (SVLFG) have joined forces to form the "German Social Insurance - Working Group Europe" (Deutsche Sozialversicherung Arbeitsgemeinschaft Europa e. V.) with a view to their common European policy interests. The association represents the interests of its members vis-à-vis the bodies of the European Union (EU) as well as other European institutions and advises the relevant stakeholders in the context of current legislative projects and initiatives. As part of the statutory insurance system in Germany, health and long-term care insurance with 75 million insured persons, pension insurance with 57 million insured persons and accident insurance with more than 70 million insured persons in 5.2 million member companies offer effective protection against the consequences of major risks of life.