

COVID-19 Practice Guidance



Telehealth in Occupational Therapy Practice

Most recent update: December 8, 2020 with extension of Order re: FIPPA

What is telehealth?

Telehealth is “the use of information and communication technologies (ICT) to deliver health-related services when the provider and client are in different physical locations” (WFOT, 2014, p.1).

What temporary measures have been implemented to facilitate telehealth practice during the COVID-19 pandemic?

On March 30th, 2020 the Minister of Citizens’ Services released a [Ministerial Order](#) regarding the *Freedom of Information and Protection of Privacy Act* (FIPPA) to support public organizations to access available tools/technologies to continue service delivery and communication during the COVID-19 public health emergency. On December 1st, the [Order](#) was extended and is in effect until May 31st, 2021, at which point it may be reviewed.

The order enables:

- Health care bodies as defined in the FIPPA, the Ministry of Health, the Ministry of Mental Health and Addictions, and the Provincial Health Services Authority to disclose personal information outside Canada for specific purposes related to the COVID-19 pandemic.
- Public bodies to use available technologies (software used to enable communication or collaboration between individuals, which may be hosted outside Canada) to continue service delivery and communication during the public health emergency.

Technologies must be reasonably secure, personal information must be removed as soon as possible when this time period has concluded, and records created must be managed appropriately. If you are considering using telehealth tools in your practice, please ensure you have read the [Ministerial Order](#), as well as the [news release](#).

The Ministerial Order has no effect on occupational therapists working in private practice who provide services that are unrelated to public bodies. Their privacy obligations continue to be governed by the *Personal Information Protection Act* (PIPA). However, occupational therapists that work in private practice and provide contracted services to public bodies (i.e. WorkSafe BC, ICBC) fall within the definition of a “service provider” as defined in [Schedule 1 of the](#)

[FIPPA](#). Those private practice OTs that provide contracted services to public bodies are advised to review their service contracts, as they may contain other provisions on disclosure of information, which would continue to be binding regardless of the Ministerial Order.

Questions about the Ministerial Order can be directed to the Privacy, Compliance and Training branch by phone at (250) 356.1851 or email at Privacy.Helpline@gov.bc.ca.

What are some considerations for using telehealth in my practice?

Used appropriately, telehealth can be a powerful tool to connect with clients. If you are contemplating its use, there are several factors to consider, including, but not limited to:

- **Jurisdiction** - For occupational therapists (OTs) registered in BC, telehealth services can be provided to clients geographically located in BC. Be aware that if the client is located outside of BC there may be registration/licensing requirements in the jurisdiction of the client that must be met before you can provide services. You should contact the OT regulator in the client's jurisdiction for more information. Since telehealth services can extend across geographical regions with varying access to resources, occupational therapists must consider efficacy of telehealth practice and be aware of what local resources are available to the client to ensure recommendations are appropriate and expectations are realistic. Occupational therapists should also check with their insurance policy provider to ensure appropriate coverage for providing services outside of BC and/or Canada.
- **Risk Management and Safety** – On a case-by-case basis, OTs should use their professional judgement to assess the risks associated with the use of telehealth technologies to determine if they are the most appropriate means of providing OT services (e.g., consider if in-person or hands-on assessment/treatment is required for this client, risks/benefits of transferring care to another OT, etc.). Additionally, you should have processes in place to address adverse or unexpected events (such as a client fall) and ensure that your insurance policy covers telehealth services. The ability to use technology by all those involved should be considered, including the understanding of access, use of equipment, system capabilities/limitations, as well as the availability of technology support for troubleshooting.
- **Privacy and Confidentiality** - OTs must ensure that the telehealth communications system is secure to protect the privacy of the client's health information. This involves understanding how personal information is transmitted, processed and stored. COTBC doesn't have the technical expertise to comment on appropriate telehealth platforms and their varying degrees of privacy, security or encryption. Prior to using telehealth, you may

need to consult with a technology specialist to ensure security mechanisms are in place that comply with provincial and federal legislative requirements to protect a client's personal health information against theft, loss, unauthorized access, use or disclosure. The Canadian Association of Occupational Therapists, Provincial Health Service Authority and Doctors of BC resources listed below may help you become more familiar with available telehealth platforms.

OTs should also review any employer, health authority and/or service provider policies on the delivery of telehealth services related to their areas of practice and the application of the Personal Information Protection Act (PIPA) and/or the Freedom of Information and Protection of Privacy Act (FIPPA) legislation (i.e. some videoconferencing technology may transfer private information through USA-based servers, which is prohibited by FIPPA (except under limited conditions, such as those that have been temporarily introduced until May 31st, 2021 in accordance with the [Ministerial Order](#) specific to the COVID-19 public health emergency)). Requirements may vary between public and private practice settings.

- **Consent and Client Identity** – As with any care provided, OTs need to obtain informed consent for services, as well as consent for the collection, use and disclosure of personal information. As part of the consent process, you should clearly explain your scope of practice and any benefits, risks, and alternatives to telehealth to manage expectations with clients, their family members and referral sources. Clients should be offered a clear and complete description of costs for the services. Consent should be obtained for videotaping, recording, or storing information and data from the telehealth session, for the transmission of information via telehealth technologies, and for the participation of other health care providers or the client's family in the provision of care. In delivering telehealth services, OTs should verify the identity of the client, other care providers, and any support personnel involved and ensure documentation of the verification processes used.
- **Documentation** - As with any care provided, OTs must ensure they are meeting documentation standards as outlined in [COTBC's Practice Standards for Managing Client Information](#).

Telehealth is one means of delivering occupational therapy services. As such, registrants must still meet COTBC's [Standards of Practice](#), the [Code of Ethics](#), COTBC's [Essential Competencies of Practice for Occupational Therapists in Canada](#), and [College Bylaws](#) when making decisions about the care you provide.

While COTBC does not have a specific guideline on telehealth, the following resources may help you become more familiar with the topic:

Provincial Health Services Authority – COVID-19 Virtual Health Toolkit (2020)
<http://www.phsa.ca/health-professionals/professional-resources/office-of-virtual-health/covid-19-virtual-health-toolkit>

Canadian Association of Occupational Therapists – Practical Considerations for Occupational Therapists who are Considering Telehealth (2020)
https://www.caot.ca/document/7171/Practical%20Considerations%20for%20OTs%20and%20Telehealth_covid19_March25.pdf

College of Occupational Therapists of Ontario - Guidelines for Telepractice in Occupational Therapy (2017)
https://www.coto.org/docs/default-source/default-document-library/guidelines-for-telepractice-in-occupational-therapy-2017d9eebd0b905e4db88b748fd2ee8a97e3.pdf?sfvrsn=876b526d_0

Canadian Alliance of Physiotherapy Regulators – Tele-rehabilitation Guidelines for Physiotherapists (2017)
<https://www.alliancept.org/publications/>

Doctors of BC – Virtual Care Toolkit (2020)
https://www.doctorsofbc.ca/sites/default/files/dto_virtual_care_toolkit.pdf

Province of British Columbia Health Authorities - Telehealth Clinical Guidelines (2015)
http://www.phsa.ca/Documents/Telehealth/TH_Clinical_Guidelines_Sept2015.pdf

World Federation of Occupational Therapists Position Statement on Telehealth (2014)
<https://wfot.org/resources/telehealth>

BC Mental Health & Substance Use Services – Practice Guidelines for Video-based Telehealth Services (2014)
<http://www.bcmhsus.ca/Documents/practice-guidelines-for-video-based-telehealth-services.pdf>

Note: Thanks to the College of Occupational Therapists of Ontario and the College of Physical Therapists of British Columbia for permission to adapt their Telepractice and Tele-rehabilitation resources.