

Considerations for the delivery of occupational therapy services through electronic means

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The practice and delivery of occupational therapy (OT) services through electronic communication technologies is becoming increasingly prevalent. The use of communication technologies enables increased access to OT services for individuals living in rural and remote areas as well as increased access to unique/specialist OT services for all clients, regardless of where the client or OT/support personnel they supervise are physically located.

With the recent COVID-19 pandemic, there is also increased need to employ electronic communication technologies to allow for continuity of OT service provision while protecting the health and safety of the public and health care providers.

The use of electronic communications such as telephone or video conferencing as an alternative to face-to-face service delivery is also referred to as telehealth, telerehabilitation, telepractice, virtual care, remote service delivery, online service delivery, etc.

Data privacy and security

When health professionals engage in the provision of services remotely, they are expected to be aware of and comply with all regulatory expectations and legislation that applies to their practice and to deliver services that meet the same expectations for quality, competent care as services delivered in-person.

ACOT [Standard of Practice](#) 1.2 requires occupational therapists (OTs) registered to practice in Alberta *“be knowledgeable of and adhere to all relevant public protection legislation, regulatory and professional legislation, bylaws, standards of practice, and code of ethics applicable to his/her/their occupational therapy practice.”* ACOT [Code of Ethics](#) indicator 1.6 requires OTs to *“safeguard client information from unwarranted disclosure.”*

As such, the move to remote delivery of health services should be undertaken carefully. Privacy is paramount when delivering OT services in-person or through electronic means. To protect the transmission of personal and health information, the chosen application must provide end-to-end security and comply with the legislative requirements that apply in your situation. Depending on your employer or with whom you are contracted by to provide services, you will either need to adhere to the requirements outlined in Alberta’s *Health Information Act* (HIA), the *Freedom of Information and Protection of Privacy Act* (FOIP), the *Personal Information Privacy Act* (PIPA) and/or the federal government’s *Personal Information Protection and Electronic Documents* (PIPEDA). If your client resides outside of Alberta, you are also required to ensure adherence to the privacy legislation of the

province/territory/country your client resides.

Alberta's Office of the Information and Privacy Commissioner (OIPC) has prepared an advisory document on electronic communication with clients:

https://www.oipc.ab.ca/media/1001934/Advisory_Electronic_Patient_Communication_Jun2019.pdf

Although not all OTs work for employers listed as custodians or affiliates under the *Health Information Act*, the recommendations in the OIPC document are considered best practice to ensure the security of the personal and health information of your clients.

Refer to the OIPC site for [resources](#) and the [latest advisories](#) on how you can protect the health and personal information of your clients.

Application functionality

ACOT cannot recommend or endorse any particular videoconferencing application, service or platform.

When choosing a videoconferencing application, you will want to consider:

- Privacy (i.e., encryption needs and/or potential hacking) and security settings
- Cost of the application
- Available features and technical supports offered (e.g. to assist with troubleshooting, during sessions)
- Your own and your client's home technology/wireless and/or data capacity
- Speed of transmission – available bandwidth (can vary across the province and may be particularly stressed during the pandemic resulting in pixelated/freezing video and/or choppy audio)

Regardless of the application selected, be mindful of:

- What services can you reasonably offer - while some screening, consultative, or psychosocial interventions may lend themselves well to virtual provision, other services may not be possible or might need to be modified. As well, some standardized assessment tools may not be validated for virtual administration.
- Your competence, and the competence of the support personnel you supervise, to provide the services remotely – ensuring you/your therapy assistants have the knowledge, skills and ability required to deliver services virtually.
- Facilitation/support on the remote end – does someone need to be available to support the client with their technology or activities?
- Dedicated space (location) – ensuring content can't be overheard by others for both yourself and your client.
- Whether your employer or funding source (e.g. contracted agency, client's insurance plan) accepts and/or reimburses for services delivered virtually.

Client consent

Registered OTs are expected to obtain informed consent from their clients when there is a change in mode of service delivery. It is up to you to determine whether your client has the capacity to consent to alternate service delivery and if not, then consent needs to be sought from the client's guardian. Consent does not need to be in writing – it can be verbal. In all cases, consent must be documented in adherence with ACOT's Standards of Practice. The process of informed consent should include discussion about risks and limitations associated with the delivery of services remotely.

Liability insurance

You will want to confirm that your liability insurance policy covers you to provide OT services virtually including coverage in case of security breaches CAOT has information relating to insurance coverage considerations for remote service delivery that can be accessed from the COVID-19 section of the [CAOT website](#); this information is accessible to anyone (not just CAOT members).

Provision of services to clients residing in other provinces or countries

If your client resides out of Alberta, it is up to you to contact the OT College for the province or country the client resides (even if temporarily). Each province/country has different legislative, registration and professional liability insurance requirements for out-of-jurisdiction OTs. Many provinces have a courtesy register if you are providing services for a limited time period. Note, the three northern territories (Yukon, Northwest Territories, Nunavut) do not have OT Colleges; if you are providing services to clients in any of the territories, you will want to check your professional liability insurance policy to ensure you are covered to provide OT services there.

As mentioned, you also need to verify that the videoconferencing application you are using adheres to the privacy requirements for any of the provinces/territories/countries you are providing services in.

Additional resources:

CAOT – [Telehealth: Practical Considerations](#). This section of the CAOT website links to guidance documents prepared by our provincial and territorial counterparts as well as other organizations (e.g. Veteran's Affairs Canada).

Please also refer to any guidance documents prepared by your employer regarding telehealth, telepractice and/or virtual care.

ACOT would like to acknowledge the Alberta College of Speech Language Pathologists and Audiologists (ACSLPA) and Physiotherapy Alberta – College and Association (PACA) for sharing their content for this practice advisory. Please also refer to their guidance documents: [Telepractice information for ACSLPA members](#) and [PACA Telerehabilitation guide](#)