

## **ACOTRO Position Statement Regarding Remote Practice**

September 27, 2023

### **Purpose**

Regulation of health professions is a public protection measure to ensure safe, effective care by a health care provider to the public. Occupational therapists may include remote delivery of services to optimize service delivery and practice. This position statement is to assist ACOTRO members to agree on a common understanding of the use of remote practice and the expectations of occupational therapists and clients, regardless of the presence of provincial differences in the management of such services.

### **Legislative Authority**

1. Each province gains their regulatory authority through provincial legislation.
2. Each province is responsible for the standards related to specific requirements for occupational therapists in the use of remote delivery of services in their practice.

**Remote (or virtual) practice refers to the use of information and communication technologies (ICT) for the purpose of delivering occupational therapy services when the client and the occupational therapist are in different physical locations (WFOT 2014).**

- Communication through remote delivery methods with a client constitutes an occupational therapist-client relationship in the same way that any face-to-face encounter would constitute an occupational therapist-client relationship. The integrity and the value of this relationship should be maintained and should not be diminished by the use of remote practice technology.
- The content and nature of the communication, and not the format or length of the communication, should determine the need for documentation and what is recorded. Telecommunications are documented in the same way that face-to-face communications are documented. The manner in which they are documented may vary according to the technology used.
- The same professional obligations that exist for consent, confidentiality, and security of information in face-to-face occupational therapy services also exist for occupational therapists utilizing remote technology to deliver services. Any limitations that remote technology imposes on the health care services, i.e. inability to perform hands-on evaluation and treatment if applicable, must be disclosed to the client.
- The technologies themselves and the use of the technologies will affect what occupational therapists should do to ensure confidentiality and security of the platform used.

### **Occupational Therapists using remote service delivery of practice must:**

- Determine if remote practice is the appropriate format for delivering the occupational therapy service.
- Ensure that the technology at both ends (client's location and therapist's location) is in good working order and utilizes safeguards for confidentiality.
- Abide by regulatory Code of Ethics and applicable professional standards and/or guidelines in the jurisdiction where registered/licensed.

- Carry out informed consent for the use of remote practice, including risks and limitations of remote practice; and the collection, use and disclosure of personal health information.
- Take necessary measures to maintain the client’s privacy and confidentiality of their personal health information.
- Document the OT assessment/treatment as per provincial standards/guidelines.
- Develop a process to deal with any adverse or unexpected events during a remote practice session i.e. fall, medical emergency, etc.
- Establish and maintain professional boundaries during remote practice sessions.
- Disclose the province where they are registered/licensed, to their clients.

**When services are delivered remotely to a client who resides in a different province the occupational therapist does not need to be registered/licensed in the secondary jurisdiction in the following situations:**

- The OT is providing education, in the form of an online workshop/ webinar, etc. to an audience in another province(s). The presenting therapist(s) must introduce themselves as an occupational therapist currently registered/licensed to practice in their own jurisdiction.
- The client is located in a province that has signed the Remote Practice memorandum of understanding (MOU)
- The OT is registered/licensed in a province that is a signatory to the remote practice MOU.
- For any other secondary jurisdiction, the OT should confirm the regulatory body of that region and determine if registration is required.

**As an occupational therapist using remote practice across jurisdictions, you must:**

- Notify the client of the location from which you are providing the service.
- Understand and adhere to the regulations, standards, and guidelines of the jurisdiction in which you and the client are located to ensure you are complying with practice requirements.
- Ensure that you are aware of restricted/reserved activities/controlled acts which can vary in different jurisdictions. Some provinces may require adherence to rules around these activities in spite of practicing in another jurisdiction, when working remotely with clients in their jurisdiction.
- Ensure that your liability insurance provides coverage for remote practice activities that are delivered to out of province clients.
- Ensure you have adequate information about that jurisdiction to provide effective OT services and make any limitations clear to the client i.e. knowledge of local resources
- Be aware that your regulator has authority to investigate and consider a complaint about you regardless of where the client is located.

Approved By	Original approval	Reviewed/Revised	Next Review
Board of Directors	September 27, 2023		September 2026