

Virtual Practice Guidelines

Introduction

These guidelines expand on the *College of Audiologists and Speech-Language Pathologists of Manitoba (CASLPM) Standard of Practice on Virtual Practice*. Registrants should review these guidelines in conjunction with employer policies and procedures and as needed, develop policies and procedures for their workplaces. The Standard and these guidelines supersede any provisions outlined by an employer.

The purpose of these guidelines is to assist CASLPM registrants in deciding when the use of virtual practice is appropriate and to support the provision of effective healthcare using technology.

General Virtual Care Information

Registrant considerations:

- Complying with applicable regulatory requirements, including registration, insurance/liability requirements, and competence.
- Ensuring that interventions, referrals, or consultations delivered by virtual practice are held to the same standards and expectations as those provided in person.
- Using their professional judgment to determine if virtual practice is appropriate, taking into consideration:
 - Whether virtual practice is the most appropriate available method to deliver services.
 - Whether in-person contact is required to complete the assessment and to determine a diagnosis and treatment plan.
 - The ability to deliver substantively equivalent care as health care delivered face-to-face.
 - If client factors such as physical, sensory, or cognitive deficits may impact the ability to deliver appropriate care via virtual practice.
- Ensuring that virtual practice does not expose the client to a higher risk than other possible service delivery methods. This can include threats to the privacy of the client's health information or client safety, depending on the physical environment and context in which services are provided.
- Informing the client of the process to follow if they have a concern or complaint about their health care, including their ability to lodge a complaint.
- Facilitating the transfer of care to another service provider if the registered member or client determines that virtual practice is not appropriate.

Informed Consent in Virtual Care

As with all healthcare services, for consent to be valid, it must first be informed. In addition to the general requirements for consent, in virtual practice, the client must have a clear understanding of the limitations that virtual practice services present as compared to in-person services. *Clients must be*

aware of all available treatment options, including options to receive in-person care and the unique risks and benefits that treatment options provide.

Registrants:

- Augment routine informed consent processes as required to support virtual practice delivery. This may include express consent:
 - To receive services via virtual practice rather than in person.
 - For videotaping, recording, or otherwise storing information and data from the virtual practice session.
 - For the transmission of information via virtual practice technologies.
 - For the participation of other healthcare providers or the client's family in the provision of care.
- Follow policies and procedures to:
 - Verify their identity to clients.
 - Verify the identity of the clients whom they serve.
 - Document the verification processes used.
- Follow policies and procedures to verify the identity of any third parties who may be observers or engaged in the delivery of care (i.e., family members, other health professionals, support staff) and obtains client and provider consent for the presence of these individuals while delivering services.
- Inform clients of any limitations that virtual practice services impose on health care services, such as the inability to apply hands-on evaluation and treatment if applicable.
- Inform clients of the risks inherent in the delivery of services using virtual practice, including threats to the privacy of client information and safeguards employed to address these risks.
- Ensure that an adult responsible for a minor's care is available to the minor when receiving services via virtual practice. (*See CASLPM's Standard and Guidelines on Obtaining Informed Consent*)

Privacy Concerns in Virtual Care

Registrant are expected to practice in compliance with all legislative and regulatory requirements relevant to their practice; the provision of healthcare using virtual practice technologies is no exception. Registrants need to be aware of and comply with the privacy legislation that is relevant to their practice and Province (*see Manitoba access and privacy laws*).

Registrants:

- Comply with all privacy and security requirements both during virtual practice sessions and when in contact with the client through other electronic means, such as arranging appointments via email.
- Document privacy and security measures used to protect the client's private information.
- Employ authentication and encryption technologies as well as secure transmission systems and

storage mechanisms. When documenting, indicate platform used to demonstrate proper security was ensured (e.g. Teams, Zoom, etc.). It is recommended that social media “live” platforms not be used for this service.

- Follow policies and procedures to ensure that client records cannot be accessed by unauthorized users, tampered with, or destroyed, and are protected at both the originating and remote sites.
- Secure all physical devices used in virtual practice and when storing information related to virtual practice services.
- Maintain awareness of current and emerging risks to client privacy inherent to virtual practice and employs technical, administrative, and physical controls to address these risks.
- Follow any employer directives regarding platform use that are beyond this standard.

Safety Considerations and Adverse Events

Registrants should consider the various safety issues that are possible within this type of practice, which may include:

- Failure of the communication technologies used to provide services.
- Client medical emergencies (e.g., falls, injuries, heart attack, stroke).
- Other emergencies (e.g., fire).

All registered members are responsible for considering the potential critical events that they face within their practice and for developing plans to manage such events.

At no time should registrants compromise the quality and safety of healthcare services by delivering virtual care services that are inappropriate or unsafe.

Registrants:

- Obtain access to/have assistance with technical support for troubleshooting in the event of technical difficulties.
- Test all technologies before client appointments to ensure the system is functioning well.
- Have alternative methods of contacting the client and provides the client with an alternate way of contacting the registered member (e.g. in the case of an internet failure, you must be able to telephone the client).
- Have a safety protocol in place in the event of an emergency or adverse event, including:
 - Contact information for local emergency services. *Note: 9-1-1 can be called in case of emergency in rural areas. The operator will connect callers with appropriate services.*
 - Contact information for others within the client’s environment (care providers, family members), and client consent to contact these individuals in the event of an emergency or adverse event.
 - Plans and procedures to follow to manage adverse events while waiting for assistance to arrive.

- Plans and procedures for managing adverse events that do not require assistance from a first responder.

Competence in Virtual Care

Registrants should consider if they have the knowledge, skills, and abilities to safely and effectively engage in Virtual Care. They should also actively seek out education, support, and advice to ensure they are using these technologies appropriately and effectively and to further develop their knowledge and skills.

Registrants:

- Ensure their competence to use the technology by
 - Understanding the system's capabilities and limitations.
 - Having technology supports available if needed.
 - Evaluating and developing their competencies to support the use of these technologies.
- Develop skills related to the delivery of services using virtual practice technologies in
 - Assessment and outcome measurement(s).
 - Development of rapport and the therapeutic relationship.
 - Providing interventions using a third party or delivered by the client at the direction of the registrant.

Consideration for Virtual Practice Outside of Manitoba

Clients Residing in Provinces under the Cross Provincial Practice (CPP) Registration

Registrants who hold a limited 200-hour CPP Registration in the provinces of Alberta, Saskatchewan, Ontario, and/or New Brunswick

- Maintain their certificate of practice with the College.
- Contact the regulatory body in the province where the client lives to register under the CPP before providing health care services to a client outside of Manitoba.
- Inform the client of their full name, professional designation, and regulatory body.

Clients Residing in Provinces other than those under Cross Provincial Practice (CPP) Registration

Registrants located in Manitoba who provide virtual practice to clients living outside of Manitoba

- Maintain their certificate of practice with the College.
- Contact the regulatory body in the province where the client lives to determine jurisdiction requirements before providing health care services to the client.
- Inform the client of their full name, professional designation, and regulatory body.

Clients Traveling to other Jurisdictions

Registered members located in Manitoba who provide virtual practice to clients traveling outside of Canada to other jurisdictions for a period of six (6) months or more must:

- Maintain their certificate of practice with the College.
- Make best efforts to contact the regulatory body where the client is traveling to see if they need to be registered in that jurisdiction before providing health care services to the client.
- Inform the client of their full name, professional designation, and regulatory body.

Documentation and Billing Considerations

Services delivered via virtual practice are subject to the same standards as in-person healthcare services; however, several additional documentation and recordkeeping considerations must be addressed.

Documentation

Registrants:

- Retain accountability for evaluating any information gathered from a third-party source (such as a non-healthcare provider physically co-located with the client), to determine its reliability and accuracy and the ability to incorporate the information into the assessment or treatment.
- Maintain written records summarizing all interventions consistent with the Standards of Practice.
- Retain any video or audio recordings generated as part of virtual practice interventions as part of the client record and these are kept confidential and in a secured space.

Billing

Self-employed registrants are required to provide fee schedules and invoices/receipts that are transparent, accurate, and comprehensive. When delivering services using virtual practice, the registrants

- Ensures that the client is aware of what services can be expected in return for fees charged.
- Provides receipts that reflect that healthcare services were delivered via virtual practice.