Virtual Visits Verification for Health Services Providers: Frequently asked Questions

In support of the province's *Digital First for Health* strategy, Ontario Health has launched a provincial verification process by which clinicians and health care organizations will have access to expanded options of virtual care solutions that are aligned to provincial standards.

In collaboration with the Ministry of Health, OntarioMD, and other health care stakeholders, Ontario Health has developed virtual visit video and secure messaging requirements designed for solutions to support clinical encounters with patients and interoperable health information exchange.

For additional questions about virtual visits verification process, please contact verification@ontariohealth.ca or visit the Verified Virtual Visit Solutions for Providers website.

1. **What is a Virtual Visit?**

   A. For purposes of this standard, a virtual visit is defined as a digital interaction where one or more clinicians, including physicians, nurses or allied health, provide health care services to a patient or their caregiver.

   An example of a virtual visit is as follows: A specialist performs a post-surgical follow-up assessment of a patient during a video visit previously scheduled by phone. The specialist asks the patient questions about their recovery and visually inspects the surgical site for signs of infection. The specialist documents the visit in a Hospital Information System (HIS).

2. **What technologies are used to deliver virtual visits?**

   A. Virtual visits can be delivered to patients using videoconferencing and secure messaging solutions. A video visit (videoconferencing) involves a real-time encounter between one or more health care providers and a patient. Secure messaging is an asynchronous, written clinical encounter, typically without any visual input (except for optional image attachments), accessible by patients via a web browser or mobile application.

3. **Does using a verified or non-verified solution impact my ability to bill for virtual care services?**

   A: It is expected that the virtual visits verification process will be leveraged by the Ontario Virtual Care Program (provider eligibility requirements will be applicable and will be announced by the ministry) and other ministry programs. Further information will be released by the ministry in the coming weeks. Unless otherwise notified by the ministry, please continue with current billing

practices that align with ministry guidance. For billing related inquiries, please contact the Service Support Contact Centre at SSContactCentre.MOH@ontario.ca or **1-800-262-6524**.

4. **What is the Verification process for?**

   A. The purpose of the Virtual Visits Solution Requirements and verification process is to ensure that virtual visit solutions meet the provincial standards, and that virtual visits between patients and providers are safe and secure, with patient privacy protected.

5. **When will the list of verified virtual visit solutions be available from Ontario Health?**

   A: Ontario Health has now launched the verification process and is accepting vendor submission packages. Any virtual visit solution vendor is eligible to submit an application package to be verified, and all applications will be reviewed on a first come, first served basis. The published list is expected to include verified solutions as early as December and expand as submissions are received and reviewed. Please check back to [Verified Virtual Visit Solutions for Providers](#) to see updated lists of solutions that have been verified.

6. **How will I benefit from Virtual Visit standards and the verification process?**

   A. The list of verified solutions will provide you with guidance on whether your existing virtual visit solution meets provincial standards, or if you are interested in procuring or using a virtual visit solution other than Ontario Health video solutions through OTNhub, you may use the verified list of solutions to guide you.

   Health Service Providers using a verified virtual visit solution will benefit through:

   - Confidence in virtual care solutions that meet provincial privacy, security, interoperability, and technical requirements
   - Safeguarding of patient Personal Health Information (PHI)
   - Billing eligibility through the Ontario Virtual Care Program (provider eligibility requirements will be applicable and will be announced by the ministry)

7. **My current virtual visit solution is not on the verified list. What do I need to do?**

   A. You should encourage your vendor to visit *otn.ca/verification* to learn about the verification process and submit its solution for verification. Vendors are also welcome to contact Ontario Health at *verification@ontariohealth.ca*.

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8. How will the verification process affect or benefit my acquisition of virtual visit solutions?

A. The verified solutions list is meant to serve only as a guide for clinicians and health care organizations in selecting and procuring approved virtual care solutions. Clinicians and health care organizations should continue to make their own independent decisions about any vendors chosen to provide solutions including conducting their own due diligence regarding vendors' and its associated solution's compliance with the Personal Health Information Protection Act, 2004 ("PHIPA") and other applicable laws.

9. Do I, as a physician or health care provider, need to conduct my own privacy & security assessments of virtual visit solutions during procurements, if this is already part of the verification process?

A. Yes. Through the verification process, health care providers will see a list of verified solutions which will indicate the current status of a vendor solution, including: that have either self-attested to meeting, or have been validated by Ontario Health as meeting, mandatory privacy & security virtual visits requirements that are key to providing patients with safe, interoperable virtual visits.

Ontario Health does not conduct a Privacy Impact Assessment (PIA) or a Threat & Risk Assessment (TRA) as part of the verification process, however, vendors are required to submit a summary of and table of content for its PIA & TRA conducted within the previous 2 years. Health care providers should make independent decisions about privacy and security risks by conducting their own due diligence regarding vendors' and its associated solution's compliance with local organizational policy, applicable laws, and patient information safeguards.

The submission of a PIA and TRA summary and participation in the solution verification process does not mean the solution is in compliance with PHIPA or that if you use the solution that you are in compliance.

10. In my role as health care provider, what else should I consider in order to deliver virtual visits to my patients?

A. It is important for health care providers to understand and follow their respective college guidelines in the delivery of virtual care. For example, the College of Physicians and Surgeons of Ontario (CPSO) and the College of Nurses of Ontario (CNO) have developed guidance for its members on aspects of virtual care. Other professional organizations and regulatory colleges, including the College of Occupational Therapists of Ontario, the Ontario Psychological Association, and the Canadian Alliance of Physiotherapy Regulators offer similar guidance for

its members. Further, nothing contained in the process is intended as legal advice; health care providers should seek independent counsel and legal advice as required.

11. **The verification process is being led by Ontario Health yet the information about the process is on the OTN website?**

    A. Although OTN as an organization was transferred to Ontario Health effective April 1st 2020 some of its websites have not been changed.

12. **Do I need to contact Ontario Health and my Vendor together to suggest that my vendor have their virtual visit solution verified?**

    A. No, health care providers do not need to contact Ontario Health. Should you wish to inform a vendor about the verification process, please encourage the vendor to contact Ontario Health directly. All details are published at OTN.ca/verification.

13. **What is the process for verification?**

    A. There are 2 phases in the verification process:

    Attestation
    - Based on the template provided, vendors will complete the submission, including attestation (the "Submission") and submit this to Ontario Health.
    - Ontario Health expects to open this stage of the verification process in late November 2020.
    - The Submission will be complete with all mandatory business and solution information as required and signed by the CEO, or other individual who holds the authority to bind the organization.
    - Completion and provision of the Submission will mean vendor acknowledgement and acceptance of the verification process terms, conditions, disclaimers, and solution requirements.
    - In the Submission, vendors should expect to demonstrate its solution's privacy and security safeguards and functionality – note Section 2.0 of the Virtual Visits Solution Requirements.
    - Ontario Health will review the Submission and follow up with the vendor as necessary for clarity, missing information or to coordinate validation.
    - Passing the Attestation step will allow vendors to progress to the validation step; otherwise the Submission or solution gaps will be identified, allowing vendors to remediate its Submission and/or solutions to comply with requirements and to return to the process at a future point. Attestation will be required on a yearly basis and any solution changes that may impact privacy or security may require a renewal of PIA and TRA summaries. PIAs and TRAs must also be updated every 3 years.

    Validation

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- After attestation has been successfully completed, solutions will undergo validation testing by Ontario Health.
- This step may be undertaken immediately after Attestation or may be scheduled for a later point, but no later than 1 year after the submission of the Attestation.
- Vendors should expect to make its solutions (and team) available to enable testing.
- Vendor should expect to conduct demonstrations of its solution's compliance to selected mandatory requirements through test scenarios provided by Ontario Health.
- Passing the Validation step will allow Ontario Health to recommend 'verified' status for the solution, to be published on the public Ontario Health verified solutions website for the benefit of health care providers and organizations.
- Otherwise vendors will be advised of deficiencies to inform remediation of its solutions to comply with requirements and a return to the Verification process at a future point.

14. How long does it take for a solution to be verified?

A. Submissions will be processed on a first come, first served basis. Vendors should anticipate receiving a notice of verification status within weeks of submitting. Turnaround times will be dependent upon the volume of applications received.

15. How do I select a virtual visit solution for clinical practice?

A. Each health service provider is responsible for selecting a vendor through their own procurement process, ensuring compliance with their legal obligations and alignment with their own internal policies and procedures. To aid in identifying vendors that meet provincial standards (either through attestation or validation), Ontario Health will be publishing a list of verified virtual visit solution vendors on otn.ca.

To further support the implementation of virtual care solutions, Ontario Health developed the *Adopting and Integrating Virtual Visits into Care: Draft Clinical Guidance*, which provides guidance for health care providers, including Ontario Health Teams, who are interested in integrating virtual care into their practices. It provides a set of key considerations, informed by professional standards and best practices.

16. What is the Ontario Virtual Care Program (OVCP)?

A. The Ontario Virtual Care Program (previously called the Telemedicine Program) enables the delivery of virtual care, including Direct-to-Patient and Hosted Video visits.

The Virtual Care Billing Information Manual outlines more details on the eligibility requirements for physicians and dentists and how to register for virtual care billing privileges.

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