



College of Physiotherapists
of Manitoba

Telerehabilitation Resource Guide

for Manitoba Physiotherapists

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The remote delivery of physiotherapy interventions mediated by communication technologies is an area of practice that is rapidly expanding. When providers engage in the provision of telerehabilitation services, they are expected to be aware of and comply with all regulatory expectations and legislation that applies to their practice and to deliver physiotherapy services that meet the same expectations for quality, competent care as services delivered in person. This resource was created to enable physiotherapists engaging in technology-mediated practice, whether within a single provincial jurisdiction or across jurisdictional borders, to do so safely and effectively.



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This resource guide was developed to elaborate on telerehabilitation expectations identified in Standards of Practice and provides practical information to help ensure that the standards are met and that patients receive competent, ethical, quality physiotherapy care.

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Introduction

The remote delivery of physiotherapy services using electronic communication technologies is becoming increasingly prevalent. The use of these technologies enables increased access to physiotherapy services for individuals living in rural and remote areas. It also enables access to providers with unique skills for all physiotherapy patients, regardless of where the patient or provider are physically located. The proportion of physiotherapists living in urban areas is greater than the proportion of the general population living in urban settings,¹ and there are challenges in recruiting physiotherapists and other health professionals to work in rural and remote areas. The use of telerehabilitation provides an innovative means to match providers to patients and address this disparity.

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

Broadly speaking, telerehabilitation refers to rehabilitation services that use any form of technology (including but not restricted to video conferencing, internet and telephone) as an alternative to face-to-face interventions.² This use of electronically-mediated communication to deliver health services can occur over large or small distances³ or across jurisdictional borders.^{2,3}

This resource is intended to assist physiotherapists to understand these expectations and develop policies and procedures to support quality, effective physiotherapy care using technology. This document should be read in conjunction with the Standards of Practice relevant to the physiotherapist's practice. Physiotherapists who wish to deliver physiotherapy services across jurisdictional borders must be aware of all regulatory requirements related to the delivery of cross-border physiotherapy services, such as those established by the Canadian Alliance of Physiotherapy Regulators.

General Performance Expectations

The physiotherapist:

- Complies with applicable regulatory requirements, including registration, insurance requirements, and competence. When providing telerehabilitation across borders, the physiotherapist must comply with the requirements of both the patient's jurisdiction and the physiotherapist's jurisdiction.
- Complies with expectations defined in the Standards of Practice and Code of Ethical Conduct. Interventions, referrals, or consultations delivered using telerehabilitation technologies are held to the same standards and expectations as those delivered in person.
- Uses their professional judgment to determine if telerehabilitation is appropriate, taking into consideration:
 - Whether telerehabilitation is the most appropriate available method to deliver services.
 - Whether a direct physical examination is required to complete the assessment and determine a physiotherapy diagnosis and treatment plan.
 - The ability to deliver substantively similar care as physiotherapy delivered face-to-face.
 - If patient factors such as physical, sensory, or cognitive deficits may impact the ability to deliver appropriate care via telerehabilitation.⁴
- Ensures that telerehabilitation does not expose the patient to greater risk than other possible service delivery methods. This can include risks to the privacy of the patient's health information or patient safety depending on the physical environment and context in which services are provided.
- Informs the patient of the process to follow if they have a concern or complaint about their physiotherapy care, including their ability to lodge a complaint in either or both jurisdictions if they choose (when services are provided across jurisdictional borders).

Informed Consent

As with all physiotherapy services, for consent to be valid it must first be informed. In addition to the general requirements for consent outlined in the Standards of Practice and related documents, with regards to telerehabilitation the patient must have a clear understanding of the “limitations that telehealth services present as compared to in-person treatment”⁴ and “specific differences between in-house care and telehealth.”⁴ Patients must be aware of available treatment options, including options to receive in-person care and the unique risks and benefits that telerehabilitation provides.

Informed Consent Expectations

The physiotherapist:

- Augments routine informed consent processes as required to support telerehabilitation delivery. This may include express consent:
 - To receive services via telerehabilitation rather than in person.
 - For videotaping, recording or otherwise storing information and data from the telerehabilitation session.
 - For the transmission of information via telerehabilitation technologies.
 - For the participation of other health-care providers or the patient’s family in the provision of care.
- Develops policies and procedures to:
 - Verify their identity to patients.
 - Verify the identity of the patients whom they serve (to the extent possible).
 - Document the verification policy and processes used.
- Develops 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 regulated or unregulated health professionals, physiotherapy support staff) and obtains patient and provider consent for the presence of these individuals while delivering services.
- Informs patients of any limitations that telerehabilitation services impose on physiotherapy treatment, such as the inability to apply hands-on evaluation and treatment if applicable.
- Informs patients of the risks inherent in delivery of services using telerehabilitation, including risks to privacy of patient information and safeguards employed to address these risks.
- Considers the relevance and appropriateness of including a “hold harmless” clause for information lost due to technology failure³ in patient agreements, privacy statements, and consent documentation.

Privacy

Physiotherapists are expected to practice in compliance with all legislative and regulatory requirements relevant to their practice; the practice of physiotherapy using telerehabilitation technologies is no exception. Physiotherapists need to be aware of and comply with the privacy legislation that is relevant to their practice. They also must be aware that when providing services to patients located in a different province or territory, the privacy legislation of both jurisdictions applies. In addition, the *Personal Information Protection and Electronic Documents Act* (PIPEDA) applies when transmitting information across provincial or territorial borders.

Privacy Expectations

The physiotherapist:

- Complies with all privacy and security requirements both during telerehabilitation sessions and when in contact with the patient through other electronic means, such as arranging appointments via email.
- Documents privacy and security measures used to protect the patient's private information.
- Employs authentication and encryption technologies as well as secure transmission systems and storage mechanisms.
- Develops policies and practices to ensure that patient records cannot be accessed by unauthorized users, tampered with or destroyed, and are protected at both the originating and remote sites.
- Secures all physical devices used in telerehabilitation and when storing information related to telerehabilitation services.
- Is aware of any employer policies for privacy and security related to telerehabilitation.
- Maintains awareness of current and emerging risks to patient privacy inherent to telerehabilitation practice and employs technical, administrative, and physical controls to address these risks.

Safety Considerations and Adverse Events

“Clients (patients) can expect to be safe in the care of the physiotherapist and in the practice environment.”⁵ That over-arching expectation seems obvious, however, the question of how to achieve this in a telerehabilitation practice is less so. The first step is to 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.
- Patient medical emergencies (e.g., falls, injuries, heart attack, stroke).
- Other emergencies (e.g., fire).

All physiotherapists are responsible to consider the potential critical events that they may be faced with in their practice and to develop plans to manage such events.

At no time should physiotherapists compromise the quality and safety of physiotherapy services by delivering telerehabilitation services that are inappropriate or unsafe.

Safety Expectations

The physiotherapist:

- Obtains access to appropriate technical support for trouble shooting in the event of technical difficulties.
- Tests all technologies prior to patient appointments to ensure the system is functioning well.
- Has an alternative method of contacting the patient and provides the patient with an alternate way of contacting the physiotherapist. For example, in the case of an internet failure you must be able to telephone the patient.
- Has a safety protocol in place in the event of an emergency or adverse event, including:
 - Contact information for local first responders, using designated phone numbers rather than 911.

- Contact information for others within the patient’s environment (care providers, family members), and patient 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.
- Should also be aware of other service providers in the patient’s area that they may refer the patient to in the event of a patient adverse event or complication.
- Facilitates the transfer of care to another treatment provider if the physiotherapist or patient determines that telerehabilitation is not appropriate.

The use of Critical Event Management Plans can help physiotherapists to consider adverse events that they may potentially encounter within their practice environment and to identify the procedures, equipment, personnel, and other resources required to manage these events. For more information, go to: https://www.physiotherapyalberta.ca/physiotherapists/resources_to_help_you_meet_practice_standards/critical_event_management_plans#critical_event_management_template



Competence

The use of telerehabilitation in physiotherapy is an emerging practice. As with any other emerging practice, physiotherapists must consider if they have the knowledge, skills, and abilities to safely and effectively engage in the practice. They should also actively seek out further education to ensure they are using these technologies appropriately and effectively and to further develop their knowledge and skills.

Competence Expectations

The physiotherapist:

- Ensures their competence to use the technology.
 - Understands the system's capabilities and limitations.
 - Has technology supports available if needed.
 - Evaluates and develops individual eHealth competencies to support the use of these technologies.
- Develops skills related to the delivery of services using telerehabilitation technologies.
 - Assessment and outcome measurement(s).
 - Development of rapport and therapeutic relationship.
 - Provision of interventions using a third party or delivered by the patient at the direction of the physiotherapist.

Documentation

Services delivered via telerehabilitation are subject to the same Standards of Practice as in-person physiotherapy services; however, several additional documentation and recordkeeping considerations must be addressed.

Documentation Expectations

The physiotherapist:

- Complies with the documentation standards of both jurisdictions when telerehabilitation is delivered across borders.
 - If the clinical or financial record retention periods differ between jurisdictions, the physiotherapist must retain the record for the longer period of time required.
- Retains accountability for evaluating any information gathered from a third-party source (such as a non-physiotherapist health provider physically co-located with the patient), to determine its reliability and accuracy and the ability to incorporate the information into the assessment or treatment.
- Maintains written records summarizing all interventions consistent with the Standards of Practice.
- Retains any video or audio recordings generated as part of telerehabilitation interventions as part of the patient record.

Additional Requirements

Quality Improvement and Evaluation

The Standards of Practice require that physiotherapists engage in continuous quality improvement by developing, implementing, and evaluating new or revised physiotherapy services. The provision of care using telerehabilitation technologies is no exception. As part of ongoing competence and service development, physiotherapists should continually track:

- Patient outcomes (effectiveness of treatment interventions).
- Patient satisfaction.
- Cost-effectiveness of services, including:
 - Business costs compared with other service models.
 - Patient/payer costs.

Fees and Billing

Physiotherapists are required to provide fee schedules and invoices/receipts that are transparent, accurate, and comprehensive. When delivering services using telerehabilitation, the physiotherapist:

- Ensures that the patient is aware of what services they can expect in return for fees charged.
- Provides receipts that clearly reflect that physiotherapy services were delivered via telerehabilitation.

Supervision

Unregulated health providers may be actively involved in the delivery of telerehabilitation services. In some cases, they may be physically present and co-located with the patient while the physiotherapist is located remote to the patient and deliver interventions at the direction of the physiotherapist. In other cases, the unregulated health provider may be applying telerehabilitation technology to deliver physiotherapy services remotely, under indirect supervision of the physiotherapist.

In either case, the physiotherapist retains accountability for the assignment of services and for providing appropriate supervision to ensure the patient receives quality, effective physiotherapy care. For more information, review the Standard of Practice and additional guidelines and documents related to supervision.

Appendix A

Definitions

In Person services are those physiotherapy services provided by a physiotherapist in direct face-to-face contact with a person.

Patient's Jurisdiction is the province or territory in which the patient is located.

Physiotherapist's Jurisdiction is the province or territory in which the physiotherapist is located.

Telehealth is an umbrella term denoting all health care services, whether clinical or educational, which are delivered via telecommunications means.

Telerehabilitation is the term agreed upon by each of the regulators of physiotherapy in Canada and is used throughout this document to denote delivery of professional physiotherapy services at a distance, using telecommunications technology as the service delivery medium.⁶ It is a subgroup of telehealth. Telerehabilitation relates to the services delivered by a number of health disciplines including physiotherapy and features all aspects of patient care including the patient interview, physical assessment and diagnosis, treatment, maintenance activities, consultation, education, and training.⁷ It can include mediums such as videoconferencing, email, apps, web-based communication, and wearable technology. Personnel may or may not be present with the patient.⁸

Conceptually, telerehabilitation is an alternate mode of service delivery of traditional rehabilitation services and should not be thought of as a new rehabilitation service in its own right. As such, the practice of telerehabilitation does not remove or alter any existing responsibilities for the provider of the rehabilitation service and providers must adhere to existing ethical codes of conduct, scope of practice, state and federal laws and individual discipline policies guiding practice.

Telephysiotherapy and telepractice are synonyms of telerehabilitation, used by some individuals and organizations.

Appendix B

Other Considerations

What system are you using and how does it work?

Physiotherapists are not required to become computer scientists to deliver telerehabilitation services, but they do need to have a basic understanding of how the system they are using works.

- Is it an online portal or a software system that the physiotherapist owns?
- Does the service provider or software company retain records of the patient encounter?
- What type of information are they collecting?
- Who has access to the information, for what purposes, and under what circumstances?
- How is that information protected?

Where's the data stored?

If a third-party service provider is retaining records of the patient encounter such as audio or video files, the physiotherapist must know where that data is stored. The physiotherapist must also disclose to the patient where their data is stored. The physiotherapist may wish to include a statement in their business privacy statement or similar document (similar to the one below) providing this information and directing the patient to the appropriate staff member if they have questions.

Information Stored Outside of Canada

We contract with companies outside of Canada to provide services on our behalf, such as with companies located in [list country/countries] who provide [list services]. These companies and their affiliates may store personal information outside of Canada. For further information regarding storage of personal information outside of Canada or regarding the XYZ Physiotherapy Clinic policies and practices regarding storage of information outside of Canada, please contact our privacy officer, whose contact information is listed at the end of this Privacy Statement.

Does the third-party telerehabilitation system provider comply with relevant legislation?

Physiotherapists are responsible to practice in compliance with all legislation relevant to their practice. In the case of services provided across jurisdictional borders, the physiotherapist must be aware of and comply with the legislation in both jurisdictions. The physiotherapist retains this responsibility when they contract with third-party service providers. When selecting systems, including telerehabilitation platforms

or portals, the physiotherapist must take the necessary steps to evaluate the system and confirm that both the system and their contractual agreements with the third-party will enable them to meet their legislated responsibilities.

Does the contractual agreement with the third-party telerehabilitation system provider enable the physiotherapist to comply with relevant regulatory rules and expectations?

The physiotherapist should evaluate any third-party agreement, asking “what do the standards require and what does the agreement say about:”

- Retention of information.
- Ongoing access to patient records:
 - For the length of the retention period.
 - Regardless of whether the physiotherapy business ceases to operate.
 - Regardless of whether the contractual agreement between the physiotherapist and the service provider is discontinued.
- Who else will have access to patient private information? What information? Under what circumstances?
- How is data protected on an ongoing basis by the third-party? What physical, technical, and administrative security measures does the third-party employ?

How do you notify patients about access to their health information?

Physiotherapists are required to retain records in a manner that enables the complete or partial record to be retrieved and copied upon request, regardless of the media used to create the record. If video or audio files are created as part of the telerehabilitation session they comprise part of the treatment record and must be retained.

A key purpose of these requirements is that the patient will have ongoing access to their personal health information. To achieve this goal, the physiotherapist must provide a means by which the patient can contact the physiotherapist to obtain a copy of the record. Physiotherapists must develop a mechanism whereby the patient can contact them after treatment has been completed and communicate this to the patient.

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Telerehabilitation in Physiotherapy

Patient Information

Telerehabilitation is the use of information or communication technologies to allow you and your physiotherapist to connect via telephone, video or other remote monitoring technology to receive physiotherapy services at a distance when an in-person visit is not possible. Here are a few frequently asked questions about telerehabilitation in physiotherapy.

When might telerehabilitation be appropriate?

There are a few circumstances where the use of telerehabilitation may enhance your physiotherapy care.

Telerehabilitation can help you access physiotherapy services that are not available in your community or allow for consultation between your physiotherapist and another physiotherapist (or another health-care provider on your team).

Telerehabilitation may be appropriate if you cannot easily attend an in-person visit. For example, if you live a long distance from the hospital or even in another province or territory, it may not be in your interest to travel to receive care, but physiotherapy may still be needed.

When would telerehabilitation not be appropriate?

Telerehabilitation should not entirely replace in-person care, but it does provide an option for assessment and treatment when an in-person visit is not possible. It is up to you and the physiotherapist to determine what is best for you, whether necessary services can be provided via telerehabilitation, and to ensure that the benefits outweigh the risks.

Will I get good quality care?

Expect to receive the same safe, quality care that you would get during an in-person visit. Physiotherapists are expected to meet the same Standards of Practice regardless of how the services are delivered.

What are the risks of receiving care via telerehabilitation?

The risks of receiving physiotherapy care specific to telerehabilitation relate mostly to concerns about the privacy of your personal health information and your personal safety. The physiotherapist is required to ensure that the location where you receive care is safe and that procedures are in place to ensure the availability of help in the event of an emergency. The physiotherapist may recommend that the visit proceed in the presence of another team member to enhance the safety and value of the visit.

Will my personal information still be private and secure?

Physiotherapists are required to ensure the privacy and security of your personal information at all times. This extends to the technology they use as well as the appropriateness of the setting in which services are delivered. For example, it may be appropriate for you to receive services in your home or at a medical facility, with the physiotherapist communicating with you from their office rather than in a public place.

Do I have to pay for telerehabilitation physiotherapy services?

It depends. Some physiotherapy services may be covered by government funding. For example, if you are having a follow-up visit after discharge from hospital. If the service is not publicly funded, you would need to pay in the same way as you would if you were attending an in-person visit.

If my physiotherapist isn't in the room who will help me and what types of care can be provided?

Depending on the setting and the circumstances, physiotherapists providing consultation or treatment via telerehabilitation may not require assistance from another person or may have assistance from another physiotherapist, physiotherapy support workers, other health-care providers, or from your family members or friends. The physiotherapist is required to ensure that an appropriate level of support and assistance is available to address your needs and ensure your safety and that you agree to the involvement of this assistance.

Examples of services that can be provided by telerehabilitation include, but are not limited to, consultation with local physiotherapists, education and instruction, monitoring your progress with a treatment program, and supervised exercise or meetings with your health-care team.

Does my physiotherapist need to be registered to deliver telerehabilitation treatment?

Physiotherapists are required to be registered with the physiotherapy regulatory college in the province or territory where they deliver services. If they are delivering services across borders, they are required to be registered in both the province where they live and the province in which they are delivering services (where you live). Check if your physiotherapist is registered before you begin treatment.

What if I have a concern or complaint about my care?

You may contact the physiotherapy regulatory college in your province, the college in the physiotherapist's own jurisdiction or both, to lodge a complaint or express a concern. The two colleges will share information if a complaint is received as well as the outcome of the complaint process.

Province / Territory	Website
British Columbia	cptbc.org/
Alberta	www.physiotherapyalberta.ca/
Saskatchewan	www.scpt.org/
Manitoba	www.manitobaphysio.com/
Ontario	www.collegept.org/Home
Quebec	oppq.qc.ca/en/
New Brunswick	www.cptnb.ca/
Nova Scotia	nsphysio.com/
Prince Edward Island	www.peicpt.com/
Newfoundland and Labrador	nlcpt.com/
Yukon	www.community.gov.yk.ca/physiotherapists/index.html
Northwest Territories	*
Nunavut	*

*When receiving care in the NWT/NU patients are advised to have the physiotherapist show or otherwise provide the patient with their licensing information as there is no physiotherapy regulatory body in these jurisdictions.



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