

Telerehabilitation Services

As the implications of the COVID-19 pandemic have begun to be realized within the physiotherapy community, Physiotherapy Alberta has received a number of calls and inquiries regarding the provision of [telerehabilitation](#) services. We are also aware of the many comments made by individuals and organizations operating in other jurisdictions, and the rules and positions of regulatory bodies of other health professions providing health-care services within Alberta.

Physiotherapy Alberta's perspective is that there is no "one size fits all" solution for addressing the health needs of all Canadians in the face of this pandemic. Direction from regulatory organizations, whether those of other professions from within Alberta, or physiotherapy regulators from other provinces, need to reflect the unique nature of the services provided by different health professions and the local context in which those services are being delivered.

Some health services cannot be delivered using digital technologies. All jokes aside, one simply cannot perform dental hygiene on one's self. Fortunately, most physiotherapists have a range of tools in their toolkits for managing patient health needs. While some treatment methods, such as joint mobilization, spinal manipulation, or needling face the same barriers as those of dental hygienists, others such as patient education, exercise prescription and self-management recommendations are amenable to this format of service delivery.

For professions whose services can only be provided in-person (due to the nature of those services), the rules regarding the use of telerehabilitation will differ from those of Physiotherapy Alberta. While that may cause confusion or conflict in some cases, it is important to remember that each regulated health profession is governed by its own regulation under the *Health Professions Act* and its own set of [Standards of Practice](#).

Registration considerations

As has been stated in prior Physiotherapy Alberta messages regarding telerehabilitation and COVID-19, our perspective is that this format of service delivery *may* be appropriate for some patients. However, it is unlikely to be appropriate for all patients seeking physiotherapy services.

Telerehabilitation services are subject to the same Standards of Practice as any other physiotherapy service. All members of Physiotherapy Alberta are authorized to provide telerehabilitation services as part of their existing registration. No special registration is required, provided you are delivering services within Alberta. If you are delivering services to patients residing in other jurisdictions, you need to contact the regulatory body in that jurisdiction to find out what rules apply to your practice. With individuals returning to their home provinces to weather the pandemic due to school and work stoppages, this becomes relevant, even if you are following your existing patients.

To better understand the rules regarding Cross-Border service delivery, refer to the [Canadian Alliance of Physiotherapy Regulators guidance documents](#) regarding cross-border services.

Getting started

While it may be tempting to jump in to providing telerehabilitation services in the face of declining ability to provide in-person services and declining patient attendances, business owners and clinicians

alike are advised to take the time to set up their services in a way that is consistent with the Standards of Practice. Once established, it will be more difficult to correct any errors made during the set-up phase than it is to do it right the first time. Look at this as a new business offering and plan accordingly, as you would plan any other venture.

Platform selection

While Physiotherapy Alberta cannot provide direction on telerehabilitation platforms that are or are not acceptable for use by physiotherapists, members are urged to consider the following when reviewing potential platforms:

- The relevant privacy legislation for private practice telerehabilitation services delivered within Alberta is PIPA, not PIPEDA or HIPPA.
 - Platforms often tout their compliance with PIPEDA or HIPPA, and there is some comfort in knowing a platform is compliant with this legislation, but it simply is not the legislation of note.
- It is essential that physiotherapists do some additional digging when deciding if a platform can address privacy requirements established by PIPA.
 - Is the platform “end-to-end” encrypted during transmission of the information?
 - Is the information collected and stored through the platform password protected and encrypted?
- What are the terms of service of the platform provider? What information does the platform collect and who has access to that information? How is information that the platform collects used by the platform provider?
 - Attentive readers may have heard about concerns raised recently in relation to the launch of Telus Babylon in Alberta and issues regarding the terms of service of the platform which reportedly grant access to private patient information to external organizations and governments.
 - As a rule, platform providers should not access patient private information and should not share that information with other parties.
 - Platform providers may track data related to business use (e.g., your behaviour when using the platform).
 - It is essential to read the terms of service, ensure that patient information is securely stored and protected from access by third parties, and ensure you understand what information the platform collects regarding your use/access to the platform and how that information is used.
- Where is the data stored?
 - There is no rule that requires data be stored within Canada or within Alberta, however; if data is crossing international borders that needs to be communicated to patients.

- What about patient records and video records of telehealth interactions?
 - Telerehabilitation visits are subject to the same Standard of Practice for Documentation and Record Keeping as other visits. Physiotherapists need to generate a record for each treatment or professional interaction completed. These records can be in paper or electronic format – consistent with the physiotherapy business' usual practices.
 - Video recordings of telerehabilitation visits are not mandatory.
 - However, if the platform used generates a recording, that recording must be retained as part of the patient record. This has implications for ongoing record retention that physiotherapists and employers need to consider.

It is likely that physiotherapy businesses will be offered service contracts on a “take it or leave it” basis but that’s not an excuse to use a platform that is not secure. As we have stated before, patient health information is a regular target of computer hackers and attacks. With the significant influx of health information available online as a result of the rapid uptake of telerehabilitation by many health professions, clinicians and business owners are advised to use caution to ensure that private information remains private.

In recent days, some parties have suggested that the adoption of platforms that are not secure may be justified due to the extraordinary circumstances we find ourselves in. **Physiotherapy Alberta does not share that perspective.**

Remote working

The adoption of telerehabilitation services may also enable physiotherapists to work from home, consistent with the expectations articulated by the Chief Medical Officer of Health. While this is a good thing and may help physiotherapists to contribute meaningfully to flattening the curve, employers need to consider the privacy issues that can arise when having staff work from home using their own computers, tablets or phones to connect with patients or to complete record keeping duties. The Office of the Information and Privacy Commissioner has an excellent resource on the security risks of allowing employees to use their [own devices](#) for work purposes.

Physiotherapy businesses must also consider the risks involved in having employees store patient records in paper format within the physiotherapist’s home environment, and strategies to adopt to mitigate those risks.

Employers need to conduct a privacy threat assessment and employ policies and procedures to ensure the ongoing privacy of information that employees store within their homes or access from their own devices. This includes both the telerehabilitation visits and any recordings generated from them, and the patient records generated following a telerehabilitation visit.

Fees and billing

Physiotherapy Alberta has been talking about telerehabilitation since long before this pandemic became an international concern. We see these services as a key method for physiotherapists to provide care to patients with a wide range of needs and who face a range of barriers to access to service, (but we cannot claim that we anticipated a global pandemic would be one of them). We are adamant that

telerehabilitation services must meet the same expectations for safety and quality as any other physiotherapy service and recognize the value that physiotherapy can offer to patients through telerehabilitation.

We believe that these services should be reimbursed accordingly. We have heard from members who have questioned whether it is justifiable to charge the same fee for a telerehabilitation visit as for in-person services. Our perspective is that there is no reason that the fees should differ based on the method of delivery, provided that the time spent with the patient and the quality of the services are equivalent, albeit potentially different in terms of the interventions provided.

As with all physiotherapy fees, members are advised to set fees in accordance with their business model, the costs of providing service, and market forces. Fees must be transparently communicated and justifiable.

We do not support the provision of free services, whether telerehabilitation or other, as we see this as devaluing the services that physiotherapists provide and may have unintended impacts upon the quality of service provided. Members are reminded of the prohibition on advertising free services identified in the Advertising Standard of Practice.

Reimbursement for telerehabilitation services remains a concern for some providers. Physiotherapy Alberta is aware of recent changes by third-party payers to enable reimbursement of these services. Due to the fluid situation and reimbursement rules that they are currently faced with, members are advised to have their patients confirm with their extended benefit providers that telerehabilitation services are covered by their plan before providing these services.

In closing, it is important to recognize that not all patients will be appropriate to receive telerehabilitation services. Physiotherapists are encouraged to critically evaluate the services they provide and patient populations they treat, and to reflect on which patients can be managed using telerehabilitation technologies.

Physiotherapy Alberta recognizes that these are extraordinary times, and that new information arises each day. We will continue to provide updates as information relevant to physiotherapy practice becomes available and encourage members to check our website regularly.

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