Conversations with the College

COVID-19 & Occupational Therapy

Lesley Krempulec, OT Reg. (Ont.)
Practice Consultant

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Outline

Questions & Answer

- Essential service
- Virtual practice
- Redeployment
Directives from the Ministry of Health and the Premier’s office are reflected in College positions.

The College is working with government to respond to this pandemic in the best interest of the public.
Question 1: Essential Service

Question: During this pandemic we, as health care providers, have been told to stop or reduce of all nonessential service. Urgent care and essential services continue. So, what does this mean for occupational therapists?

Answer: A general guideline when determining essential occupational therapy service:

Would the client’s health or function considerably decline if occupational therapy service is not provided?
OR
Is delivery of the service time-sensitive to avoid a negative outcome?
If the answer is yes to either question, the service is considered essential.
Question 1: Continued

Steps to Take:

1. Write down a rationale or guiding criteria on what is essential in the OT’s area of practice
2. Refer to the guiding principles set out by Ministry of Health and considerations that COTO developed
3. Call COTO practice resource service at 1-800-890-6570 extension 240. Practice consultants can help talk you through some of these situations.

Office of the Chief Medical Officer of Health (Directive # 2- for Health Care Providers)
Premier’s Office: List of Essential Workplaces
College Guidance for Occupational Therapy Services During COVID-19 (April 6)
Occupational Therapy Services During COVID-19: Providing Clarification (April 8)
Question 2: Virtual Practice

We have invested in online platforms so we can provide virtual care to clients. I am confused – can or can we not do online occupational therapy?

Yes. Occupational therapists can provide essential services either by telephone or other virtual means.

In-person services can only be provided if the service is urgent.

COTO Information on COVID-19 – FAQ
Guidelines for Telepractice in Occupational Therapy
Question 3: Virtual Practice

I work in private practice and am delivering service virtually. Does that mean I have to stop my practice if not considered essential? If services were not needed, I would discharge the client and they might regress.

Much of what occupational therapists do can be considered essential. If the service either prevents considerable decline OR avoids negative outcomes in clients or their families, it can be deemed essential and therefore can continue.
For those clients who have nonessential needs for this temporary period we suggest an OT follow “on hold” or “prolonged absence” procedures for example:

- Communicate to clients, referral sources and others about the *reason* for the delay or deferral in service.
- Keep clients *informed* as ongoing direction becomes available regarding ability to provide service.

A client’s status can fluctuate during this period so have a clear plan on how to monitor status or instructions for clients should their status become urgent/essential.
Question 4: Virtual Practice

Can the College recommend, sanction, or approve platforms to be used for telepractice?

No. With new technologies emerging, the College does not recommend or endorse specific online platforms for virtual care. Occupational therapists should take reasonable steps to investigate the security and privacy of platforms. Professional associations may have resources on platforms.
Question 5: Virtual Practice

Can patients and clients send pictures or videos of themselves from their own devices to us to help in the assessment process?

Yes. If the OT has determined that providing service virtually is a **clinically effective** and an **appropriate** way to deliver the service and a **client understands** factors like:

▪ potential privacy risks in transmission and storage of data
▪ impact digital means may have on the quality of the assessment or interpretation of the clinical data
▪ client's ability to clarify and add additional clinical data

*The requirement for OTs to obtain client consent is the same for telepractice and in-person client interactions.*

Guidelines for Telepractice in Occupational Therapy

Standards for Consent
Can the College provide an outline of fees for online services?

No. It is beyond the authority of the College to establish fees for occupational therapy services.

Fees must be fair and equitable, and billing practices must be transparent.

Guidelines for Private Practice
Question 7: Virtual Practice

I am a therapist registered in Ontario, but I have clients that because of COVID-19 have returned home to another province. Can I still provide virtual services to them?

Yes. However, the jurisdiction for the provision of occupational therapy services is defined by the location where the client resides - even if they reside there temporarily.

February 2018: Telepractice with Clients Outside Ontario
Question 7: Continued

An OT wanting to provide out-of-province service will:

1) Determine if the service is essential and if it can be effectively provided virtually or by phone.

2) If yes, contact the regulatory College in the province of the client to request temporary registration. Most provinces are waiving fees and expediting the process.

3) Upon receipt of temporary registration, provide the service virtually.
What does the College say about OT redeployment to areas where OTs do not feel they have competency? What are the expectations for OTs who find themselves in these situations?

- focus on the transferable skills that can be leveraged
- OTs should have appropriate training and competency (knowledge, skills and ability) to safely perform activities
- seek out shadowing and training opportunities and plans to address difficult or unfamiliar situations.
Question 9: Redeployment

We may not have the time or, in some cases, access to document as usual. What is expected for documentation during the pandemic?

▪ Standards for Record Keeping still apply
▪ Possible to streamline or change current documenting processes
Question 9: Cont’d

Application of the Standards for Record Keeping

- The following **standards** describe the minimum expectations for OTs.
- The **performance indicators** listed below each standard describe more specific behaviours that demonstrate the Standard has been met.
- It is not expected that all performance indicators will be evident all the time. It is expected performance indicators could be demonstrated if requested.
- There may be some situations where the OT determines that a particular performance indicator has less relevance due to client factors or environmental factors. Such situations may call for the OT to seek further clarification.
- It is expected that OTs will always use their clinical judgement to determine how to best maintain records based on the scope of the practice, practice setting, client and stakeholder needs.
- It is expected that therapists will be able to provide reasonable rationale for any variations from the Standard.

Balance what is needed and what is reasonable given that we are in a pandemic.

[Standards for Record Keeping](#)

[Guidelines for Working Within Managed Resources](#)
Evolving Guidance

Watch for:

- New and revised Ministry guidance regarding long-term care and congregate settings

- New Ministry guidance regarding mental health and addictions

Continue to check your email and visit our COVID-19 webpage.
How to Reach the Practice Resource Service

Email: practice@coto.org
Call: 416.214.1177/1.800.890.6570 x240
Thank You

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