

## Ontario Health OTNhub Schedule – Provincial eConsult Program

The Ontario eConsult Program (the “Program”) enables requesting primary health care providers to ask specialists clinical questions electronically and receive a response within days, often eliminating the need for an in-person patient visit. Accessed primarily through the secure OTNhub ([otnhub.ca](http://otnhub.ca)), the Program is led by the Ontario eConsult Centre of Excellence (COE), housed at The Ottawa Hospital in partnership with the Bruyère Research Institute. Regional partners include Champlain BASE™ (Building Access to Specialists through eConsultation) and the South East Academic Medical Organization (SEAMO). Delivery partners are Ontario Health (OH) and OntarioMD, with the support of the Ministry of Health (the “Ministry”).

- A. The Program enables requesting primary health care providers (each a “Requesting Provider” and collectively, “Requesting Providers”) to electronically consult with medical specialists (each a “Specialist” and collectively, “Specialists”) and receive a response within days.
- B. The purpose of the Program is to enhance timely access to Specialist advice or care, which may eliminate the need for an in-patient visit.
- C. OH will use transactional and record level data created through the use of the Program to generate reports on the utilization of the Program and share this utilization information with Local Health Integration Networks (“LHINs”), the COE, eConsult regional and delivery partners, the Ministry, and other partners qualified by the COE from time to time or as required under agreements or the law. This information may contain the personal information of users but will not contain personal health information (“PHI”).
- D. Transactional data, Specialist full name, contact information, the College of Physicians and Surgeons of Ontario (CPSO) and OHIP billing # will also be used by the COE to remunerate Specialists for the services they provide through the Program.
- E. Requesting Providers complete evaluation questions after each consultation. The evaluation questions may be amended by OH or the COE from time to time. OTN will collect the responses to the Program evaluation questions and may create aggregate data from the responses and may share this evaluation data with you and the COE. Regional and delivery partners and the Ministry may be provided with collated, anonymized data to evaluate the use and effectiveness of the Program and to identify changes, if any, that could be made to improve the use and effectiveness of the Program and to fulfill reporting requirements under agreements related to the Program with the Ministry. When completing the Program evaluation questions after each consultation, please do not provide any PHI.
- F. OH will, acting on behalf of Requesting Providers and Specialists, remove any PHI inadvertently submitted in response to evaluation questions.
- G. OH will notify and will request cooperation and assistance from Requesting Providers and Specialists regarding any inquiry, investigation, complaint, breach of security or privacy or other action related to the Program.
- H. Requesting Providers and Specialists using eConsult services through OH should retain and copy any PHI or other information exchanged through the Program into their own records to meet any record-keeping obligations.
- I. Best practice guidelines about your use of the Program may be created and/or amended from time to time for your review and consideration.

## **Roles, Responsibilities and Best Practice Guidelines for Requesting Providers and Specialists Participating in the Ontario eConsult Service**

These guidelines and roles and responsibilities descriptions are being provided to you in connection with your use of the Provincial eConsult Program's eConsult Service (the "eConsult Service"). These guidelines and roles and responsibilities descriptions are supplementary to, and form part of, the Ontario Health OTNhub Terms of Service and the OTNhub User Agreement (the "OTNhub Agreements").

### **A. Background**

The eConsult Service provides primary care providers ("Requesting Providers") with an asynchronous electronic communication tool that allows them to communicate directly with Specialists via a web-based portal so they can obtain advice about their patients' care. The eConsult Service has been developed to improve equitable and timely access to specialist advice for Requesting Providers and their patients. All participants must be committed to improving communication between Requesting Providers and specialists and providing excellent patient care.

### **B. Registering for the Service**

All participating specialist providers must complete the onboarding process. This includes registration, training, reimbursement process and who to contact in case of concerns/suggestions. If a specialist also wants to be able to submit an eConsult to another specialist, they are encouraged to complete the online training available for initiating an eConsult.

Only members in good standing of the College of Physicians and Surgeons of Ontario or of another professional college deemed appropriate (such as pharmacists) can participate. Specialists will provide consultations only within their scope of practice. Appropriate medical (or other health professional, as applicable) protective insurance must be maintained. Providers must withdraw from the service if they are no longer members of their professional college in good standing or covered with medical protective insurance.

### **C. Service Level Expectations for Specialists and Requesting Providers**

#### **1. Requesting an eConsult**

Requesting Providers are expected to document in the eConsult case the information necessary for specialists to answer specific questions or provide appropriate advice. The case details should include information about the patient's problem; the clinical questions to be answered; patient details and related investigations, treatments and medications.

#### **2. Response to requests**

Specialists responding to eConsults should provide an opinion based on the information included in the eConsult. In general, specialists should expect Requesting Providers to provide necessary information about the patient's problem; the clinical question to be answered; patient details; and relevant investigations, treatments, and medication. As such, specialists should have sufficient details about the patient's condition to be able to provide answers to specific questions and give appropriate advice. However, not all patient questions can be answered through eConsult. The specialist may request that the Requesting Provider provide more information prior to providing an opinion or may decline to make a recommendation. If further information is required, or an opinion cannot be provided, the specialist should communicate same to the Requesting Provider.

#### **3. Timeliness of Response**

It is expected that the specialist will reply as soon as is possible, but no later than seven days from the date of receipt of the eConsult from the Requesting Provider.

#### **4. Privacy**

The eConsult Service stores the clinical information/personal health information ("PHI") related to an eConsult submitted by a Requesting Provider securely in a repository. Through a series of workflows, information is transferred

from this database into forms which only the identified parties involved in the eConsult interaction can access.

Access to the eConsult platform requires individualized user accounts and is password protected. Requesting Providers (or delegates acting on their behalf) will only have access to information about consultations the Requesting Provider has initiated, while responding specialists will only have access to consultations assigned to them.

Requesting Providers or specialists that use delegates to input information on their behalf should notify the eConsult Service immediately once a delegate has changed roles or left the practice and should no longer have access on behalf of the Requesting Provider or specialist.

All privacy and security policies that apply to patient charts in the Requesting Provider or specialist office should apply to the consultation.

Requesting Providers and specialists are responsible for ensuring that their use of the eConsult Service complies with all the requirements and provisions of the *Personal Health Information Protection Act, 2004* (PHIPA).

#### 5. Consent

The Requesting Provider is responsible for documenting in the eConsult case any applicable patient consent directives, including those that impact how a case is assigned, redirected or otherwise managed.

Specialists must comply with any patient consent directives documented in an eConsult case.

#### 6. Documentation

Requesting Providers maintain their role as health information custodians of PHI that they create or collect through an eConsult, and should follow all existing rules, regulations and laws. As mentioned above, the Requesting Provider should provide sufficient information about the patient so that a specialist may provide needed healthcare advice and recommendations for treatment.

The consultation response will be included in the record of the eConsult which can be accessed by the Requesting Provider following the closure of the case. The record should be downloaded by the Requesting Provider or their delegate and stored in paper or electronic formats in the Requesting Provider's record for the patient.

#### 7. Impact on other clinical work

Participation in the eConsult Service may result in restrictions on other clinical activities. The specialist should assess the impact on other clinical work and patients and consider opportunities to reduce this impact.

#### 8. Providing availability:

All specialists participating in the eConsult Service should provide availability and "out of office" notification through the established processes of the Service.

#### 9. Engagement

Specialists participating in the eConsult Service should be active participants in continuous improvement of the eConsult Service. This may include reviewing proposed changes to the eConsult Service, physician utilization of the eConsult Service evaluation data provided to them and providing input on workflow/system improvements. This may involve working with regional and provincial stakeholders.

### D. Role of Delegates

In some circumstances, a Requesting Provider or specialist may elect to delegate the responsibilities for entering/retrieving eConsult data to an appropriate staff member (such as a referral clerk) within their practice or use eConsult to support their residents or trainees who submit an eConsult under their supervision. The Requesting Provider or specialist is responsible for ensuring that the delegate has the necessary training and credentials for this role and is responsible for advising the

eConsult Service when a trainee or staff member no longer has a role as their delegate for the purposes of the eConsult Service.

**E. Billing and Payment information**

The billing times are processed quarterly based on the agreed pro-rated hourly rate. Specialist providers who receive a salary from a publicly funded agency should not be billing for eConsults unless outside of the scope of employment and done outside of publicly funded time. Specialists are expected to bill only for time required to answer the clinical question. This may require accessing resources to provide an informed response. However, detailed research and extensive response is outside the scope of the eConsult Service. Specialists are expected to keep billing information up-to-date to facilitate timely payment.

**F. Contacts**

Questions about eConsult can be directed to the eConsult Centre of Excellence at [eConsultCOE@toh.ca](mailto:eConsultCOE@toh.ca). Technical questions about eConsult can be directed to OH's Member Services and Technical Support at 1-855-654-0888.

**G. Privacy Breach Management**

In the event of a suspected or confirmed privacy incident or breach, Requesting Providers and Specialists must immediately report the incident to the OH Privacy Office at [OH-OTN\\_privacy@ontariohealth.ca](mailto:OH-OTN_privacy@ontariohealth.ca). Requesting Providers and specialists must also notify the Privacy Officer (or equivalent role) at their organization (where applicable).

## Roles and Responsibilities for eConsult Specialist Groups

This roles and responsibilities information is being provided to you in connection with your use of the Provincial eConsult Program's eConsult Service (the "eConsult Service"). This roles and responsibilities information is supplementary to, and forms part of, the Ontario Health OTNhub Terms of Service and OTNhub User Agreement (the "OTNhub Agreements").

The eConsult Service allows Specialists to apply as eConsult Specialist Groups ("the Group" or "Groups"). Groups may operate under the BASE-managed specialty model or the OH direct-to-specialist model. Groups may consist of Specialists belonging to a single health information custodian organization (e.g. a hospital), include Specialists who are themselves health information custodians, or may be comprised of Specialists from multiple health information custodian organizations. In addition to Specialists, Groups rely on additional roles (Group Administrators and Assigners) to manage activities on behalf of the Group.

### A. Group Administrators

#### 1. Role

Group Administrators manage various administrative tasks of behalf of a Group. Group Administrators may add and remove Specialists from the Group, designate existing eConsult users as Assigners for the Group, and manage certain settings on behalf of the Group (e.g., availability settings for Specialists). Group Administrators may be COE or OH staff members who provide administrative support for Groups or may be employees of a health information custodian participating in the Group. Group Administrators do not have access PHI stored as part of the Service.

By designating an eConsult user as an Assigner for a Group, Group Administrators enable PHI access for that user (see Assigner role description below). In doing so, Group Administrators act on behalf of the Specialists (health information custodians) in a Group. In cases where participating Specialists are not themselves health information custodians, Group Administrators act at the direction of Specialists, on behalf of the health information custodians whose authorized Specialists are participating in the eConsult Group

#### 2. Responsibilities

- a. Group Assigners must only add and remove Assigners and Specialists from a Group at the direction of the Group's participating Specialists and/or the associated health information custodians.

### B. Assigners

#### 1. Role

Assigners use established business rules to direct eConsult cases to the appropriate Specialist in their Group. There are different categories of Assigners (Basic, Department and Triage) with varying levels of PHI access. For clarity, Triage Assigners may access full eConsult case details while Basic Assigners may access only patient demographic details and health card numbers.

When Assigners access and/or use PHI to assign cases to Specialists in the Group, they do so as agents<sup>1</sup> of the Specialists (health information custodians) in the Group. In cases where participating Specialists are not themselves health information custodians, Assigners act at the direction of Specialists, as sub-agents on behalf of the health information custodians whose authorized Specialists are participating in the eConsult Group. In such cases, Specialists act as agents of the associated health information custodian.

#### 2. Responsibilities

- a. Assigners must only access/use the PHI available to them via the eConsult service for the purpose of assigning cases within their eConsult Group and for fulfilling other aspects of their role as Assigner.
- b. Assigners may not access or use PHI for any other purpose, including to compile statistics.
- c. Assigners must comply with any patient consent directives that impact how a case may be assigned or redirected.

---

<sup>1</sup> For the purposes of this Schedule, agent has the meaning set out in the *Personal Health Information Protection Act, 2004*, s(2).

## **C. Specialists**

### **1. Role**

Specialists in Groups have the same role as described in the “Roles, Responsibilities and Best Practice Guidelines for Requesting Providers and Specialists Participating in the Ontario eConsult Service” above.

### **2. Responsibilities**

Specialists in Groups have the same responsibilities as described in the “Roles, Responsibilities and Best Practice Guidelines for Requesting Providers and Specialists Participating in the Ontario eConsult Service” above, in addition to the following:

- a. Specialists must advise the eConsult Service when an Assigner is no longer authorized to act as their agent/sub-agent for the purposes of the eConsult Service.
- b. Specialists must advise the eConsult Service when a Group Administrator is no longer authorized to act on their behalf for the purposes of the eConsult Service.

## **D. Privacy Breach Management**

In the event of a suspected or confirmed privacy incident or breach, the Group Administrator, Assigner or Specialists who identifies the incident must immediately report it to the OH Privacy Office at [OH-OTN\\_privacy@ontariohealth.ca](mailto:OH-OTN_privacy@ontariohealth.ca). Group Administrators, Assigners and Specialists must also notify the Privacy Officer at their organization of the incident (where applicable).