Virtual Visits Verification: General Frequently asked Questions

(February 2, 2021)

In support of the province's Digital First for Health strategy, Ontario Health has established a provincial standard for virtual care solutions and launching a verification process to assess the alignment of solutions to these.

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, please contact Verification@ontariohealth.ca.

FAQs for Vendors

1. How do I get a 'submission package'?

    A. In order to initiate the process, send an email to verification@ontariohealth.ca or complete the Contact Us form found on the otn.ca/verification page and state in your message your interest in participating in the verification process. Ontario Health will respond to your message with instructions and relevant materials.

2. What should vendors prepare in advance of submitting for verification?

    A. In order to become verified, vendors must attest that their solution meets all mandatory requirements as specified. Vendors are encouraged to become familiar with the requirements. In the process, vendors will be required to submit up-to-date summaries of their Privacy Impact Assessment (PIA) and Threat Risk Assessment (TRA) conducted within the previous two years as part of the first stage of verification. Summaries must include a table of contents of the PIA/TRA.

3. How long will the verification process take?

    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.

4. What does the verification process entail?

    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.
- 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 their 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

- 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.
- Vendors will otherwise be advised of any deficiencies to inform remediation of their solutions to comply with requirements and a return to the Verification process at a future point.

5. How do vendors apply to be verified?

A. Details are available on www.ontariohealth.ca/verification. Vendors are encouraged to visit the site to keep up-to date on the latest information, in addition to https://otn.ca/newsroom/ where Ministry of Health INFOBulletins related to virtual care are re-published.

6. Are there any fees associated with providing a submission to the verification process?

   A. No, there are no fees associated with the provision of a Submission. That said, vendors are responsible at all times for all costs associated with ensuring that their solution and services meet the mandatory solution requirements expected of verified solutions.

7. Is there a window that vendors must complete their submission by to enter this process?

   A. No. Vendors will be able to apply for verification on an ongoing basis. The Submission can be completed within any timeframe and submitted to Ontario Health via: Verification@ontariohealth.ca. While there is no prescribed timeframe for the provisions of a Submission, Ontario Health may, at any time without notice or liability, and for any reason whatsoever, terminate, change, suspend or discontinue any aspect of the process.

8. What does it mean for solutions to become verified?

   A. All vendors are required to attest to meeting a set of mandatory virtual visit solution requirements in the form of an attestation. Solutions will then undergo testing (as determined by Ontario Health) to validate they meet selected mandatory requirements under the provincial standard. Unique solutions will be verified – some vendors will offer more than one solution (product) and thus will be required to verify each through this process. Solutions may be integrated into different EMR or HIS platforms or may be used by health service providers on a stand-alone (non-integrated) basis.

9. Does a unique instance of a solution constitute a unique solution/product for which vendors need to gain verification status?

   A. It depends. Ontario Health is looking for commercially available solutions, major release versions, and comments on how solutions are deployed. If the solution is distinguishably customized for a given customer, then it would be a separate product. Vendors should contact Ontario Health before submitting to the process to be sure the parties are aligned on how a product is categorized.

10. What happens when a vendor is approved?

    A. Ontario Health will issue the solution vendor a notice of approval for solutions that meet all mandatory requirements. The solution name will be published on [Verified Virtual Visit Solutions – Vendor List](#) page for ease of reference for health care providers and organizations exploring their virtual care solutions options. The list of verified solutions will be updated on an ongoing basis as submissions are received and reviewed.

11. Are both video and secure messaging modalities approved to be used by health care providers as part of provincial virtual care programs?

    A. This process will verify solutions for video and/or secure messaging and verified solutions are published on otn.ca. Currently only video is an approved virtual visit solution under the Ontario Virtual Care Program.

12. If a solution has been successfully verified can it be procured by any buyer in the province?

    A. While any verified solution may be procured, verification does not replace procurement. For clarity, health care providers (buyers) are required to procure solutions following the government procurement requirements applicable to the health care provider.

13. What happens if a vendor is not approved?

    A. Vendors that do not meet all mandatory requirements, or do not fully complete the registration package, will be notified and invited to re-submit when ready.

14. What happens if Ontario Health determines that a solution that has been previously verified with Ontario Health no longer meets the mandatory requirements?

    A. A cross-functional team will be responsible for continuously reviewing and receiving change notices, complaints and yearly attestation from and about a vendor's ability to meet mandatory requirements.

    B. Ontario Health will contact the vendor and a timeline will be established and agreed upon to ensure that vendors have a reasonable period of time to remediate any given gap. Where a vendor fails to remediate, eligibility as a verified solution may be cancelled, the vendor solution de-verified, and removed from the list / or have their status updated.

15. Do vendors need to notify Ontario Health if changes are made to its software/platform? What sort of changes would warrant such a notification?

   A. It is a vendor's responsibility to submit a change notice for any system change that may affect its ability to meet mandatory requirement as specified in the [Virtual Visits Solution Requirements](). Vendors are not expected to notify Ontario Health of minor changes that do not impact its ability to meet mandatory requirements. A change notice form will be included as part of the submission package. For greater clarity a change notice should be submitted for any organizational or system change that may impact how PHI is handled or protected. The change notice may require the vendor to conduct a delta or refreshed PIA and/or TRA and submit a revised PIA/TRA summary to Ontario Health.

16. I have an OntarioMD-certified EMR Offering, do I need to be verified by Ontario Health to be recognized as a verified Virtual Visit Solution?

   A. The Ontario Health Virtual Visits Verification Program focuses on the set of Virtual Visit Solution Requirements in the provincial standard which are agnostic of the solution type (i.e. not specific to EMRs, HIS, etc.). A vendor's product will be required to meet the set of mandatory requirements identified in the standard/specification. At this time there is no reciprocity between OntarioMD's EMR Certification and Ontario Health's Verification Program.

17. How can vendors ask questions?

   A. Vendors are encouraged to email Verification@ontariohealth.ca to submit questions. Ontario Health will respond to all vendor questions by updating the FAQs and will periodically republish these on www.ontariohealth.ca/verification.

18. Is this verification process mandatory for virtual visit solutions?

   A. The verification process is voluntary. However, vendors should be aware, and take into consideration, that the ministry plans to leverage the the verified list of solutions to support decision making regarding investments into emerging virtual care initiatives. Physicians are also encouraged to use verified solutions when delivering video visits using the temporary virtual care fee codes ('K-codes') to submit claims to protect the safety and privacy of patients and providers.

19. Will clinicians and health care organizations be required to only use verified solutions?

    A. Ontario is moving toward a standards-based approach for evaluating virtual visit solutions so that providers and patients can be confident that the virtual visit solutions they use meet mandatory requirements for Virtual Visits established by Ontario Health. The ministry plans to leverage the verified list of solutions to support decision making regarding investments into emerging virtual care initiatives. This FAQ will be updated when further information is released by the ministry.

20. Will the requirements change?

    A. Yes. Ontario Health expects the provincial standard will evolve over time as virtual visit solutions mature. Vendors will be advised of future updates. Ontario Health will publish updated versions of the solution requirements on www.ontariohealth.ca/verification. Verified vendors will be notified of changes made to the requirements to which it has already attested to meeting. Where a requirement has changed and a solution vendor is no longer able to attest to meeting that requirement, a remediation process will be initiated to ensure that the vendor has ample notice and sufficient time to meet the updated version of the requirements.

21. What is involved for vendors in the validation phase?

    A. After successful completion of the attestation phase a vendor and their solution are denoted as Verified on the Solutions Site. At that time, vendors will be contacted to schedule validation testing, which will be done by OntarioMD on behalf of Ontario Health.

22. When will I need to do validation?

    A. Vendors are required to return within 12 months from the date of their submission to participate in the validation phase. Ontario Health encourages vendors to validate the compliance of their solution as soon as is practical within this timeframe.

23. Will I sign a separate agreement with OntarioMD?

    A. No, a separate agreement is not required. In your attestation letter provided with your Submission you agree to be bound by the Virtual Visits Verification Process Vendor Terms and

Conditions which includes the use of third parties, such as OntarioMD, to conduct certain services and activities on behalf of Ontario Health in the Virtual Visits Verification. For clarity, OntarioMD is a service provider to Ontario Health; your relationship through the Virtual Visits Verification Process is with Ontario Health.

24. Why is OH accepting SOC2 Type 2 audits as an alternative to the requirement that vendors perform Threat Risk Assessments (TRA)?

    A.   The purpose of SOC2 Type 2 audits is to assess an organization's ability to protect personal information and customer data based on 5 Trust Principles of which Security Common Criteria is one. Performed by an accredited auditor and defined by the American Institute of Certified Public Accounts (AICPA), SOC2 is a high bar standard that for the purpose of virtual visits verification is accepted as equivalent to a TRA.

For more information, please visit or visit our website at: www.ontariohealth.ca/verification