



Ontario Health
OTN

Virtual Visits

Solution Requirements

Version 1.1.1

November 2020

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i. Acknowledgements

The requirements listed in this document are informed by several provincial initiatives, including *the eVisit Primary Care* and *Partner Video* pilots, and have been reviewed by many health care organizations and clinician leaders.

OTN would like to thank the following individuals and organizations for their extensive contributions to this document.

Dr. David Kaplan, Ontario Health Quality
Dr. Duncan Rozario, Oakville Virtual Care Program
Dr. Kevin Samson, East Wellington Family Health Team
Dr. Marco Lo, Magenta Health
Dr. Danielle Martin, Women's College Hospital
Andriana Lukich, St. Joseph's Healthcare Hamilton
Brendan Kwolek, Halton Healthcare
Eva Serhal, Centre for Addiction and Mental Health
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Association of Family Health Teams of Ontario
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Ontario Health
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Ontario Medical Association
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ii. Disclaimer

This document relates to, but is not specific to, the provincial services of Ontario Health or other provincial health organizations. The standard detailed in this document is a non-normalized standard and therefore errors, omissions and revisions may occur. This document is not intended to be, nor should it be deemed, legal advice. Ontario Health encourages legal counsel be engaged as required.

iii. Change Highlights

For traceability, the following significant changes were made:

In version 1.1.1:

- It is expected that these requirements will be leveraged by the Ontario Virtual Care Program and other ministry programs. (Further information on this, including provider eligibility requirements, will be released by the ministry in coming weeks.)

In version 1.1:

- Document has been amended to reflect OTN joining Ontario Health
- Section 1 (Introduction) has been amended to include information about Ontario Health's Virtual Visit Verification Program
- Requirement 2.1.9 has been added to reflect AODA Level AA compliance
- Requirement 2.1.7 about notifications of virtual visit availability is now applicable to both video and secure messaging solutions
- Requirement 4.2.8 was moved to the general section
- English and French language support was added a recommended requirement in the general section
- General privacy program requirements (2.3.1, 2.3.2 and 2.3.3) have been added
- Audit requirement 2.3.4 and 2.3.5 has been amended with new logging requirements
- Requirement 2.3.6 has been amended to reflect recommended cryptographic standards
- Requirements 2.3.7 and 2.3.8 have been amended to include specific PIA and TRA requirements for the verification process
- Requirements 2.3.9 and 2.3.10 have been added for vulnerability assessment scans and penetration testing
- Requirement 2.3.13 has been added to include support for data retention
- Requirements 2.3.14 and 2.3.15 for data residency have been amended
- Video requirement 3.2.3 has been amended to clarify that video solutions must support immediate initiation of video visits
- Video requirement 3.2.7 has been amended to clarify video event management functionality
- Video requirement 3.2.8 has been amended to include additional security controls for guest user access
- Section 5 (Data Requirements) has been amended

1. INTRODUCTION

This document describes general functional and non-functional requirements for digital solutions used by health care organizations and clinicians to support virtual clinical encounters (“virtual visits”) with patients.

This document addresses two types of virtual visit solutions:

- Videoconferencing
- Secure Messaging

This document outlines a framework and mandatory requirements that virtual visits solutions must demonstrate as part of the Ontario Health Virtual Visits Verification process. The purpose of the Verification process is to help health service providers select solutions that are designed to support safe, privacy and security enhanced virtual visits with patients and advance interoperable health information exchange.

A list of solutions that have successfully completed the process and attested to meeting the provincial standard will be published by Ontario Health online to guide health care organizations in selecting and procuring verified virtual care solutions.

It is expected that the Virtual Visits Verification process will be leveraged by the Ontario Virtual Care Program (*provider eligibility requirements will be applicable*) and other ministry programs. Please monitor the Ontario Virtual Care Program billing manual and virtual care INFOBulletins for up-to-date information about which virtual care services are eligible for reimbursement and any associated technology requirements.

The provincial standards will continue to evolve as virtual visit solutions mature. Both vendors and health service providers will be advised of future updates to the solution requirements.

The Verification process is also intended to demonstrate that solutions align with the direction and expectations in the Digital Health Information Exchange (DHIEX) policy for Ontario. Ontario Health will provide additional information in the future as the work on digital health information exchange progresses.

This document has also been prepared to provide guidance to health care organizations, including Ontario Health Teams, who are interested in procuring a virtual visit solution other than OTN video solutions.¹ Health care organizations and clinicians may have unique obligations

¹ The Provincial Digital Health Services Catalogue is published within the Ministry of Health’s Digital Health Playbook. Please see:
http://health.gov.on.ca/en/pro/programs/connectedcare/ohd/docs/dig_health_playbook_en.pdf

not included in this framework and as such should consult with their respective privacy and/or legal office or counsel as they assess their readiness to deploy or use a virtual visit solution.

This document references several external sources, including the Ministry of Health’s *Digital Health Policy Guidance Document*², College of Physician and Surgeons of Ontario’s published policies on telemedicine³, medical record-keeping⁴, Ontario Hospital Association guidance⁵, and the Hospital Act⁶.

A companion document - *Adopting and Integrating Virtual Visits into Care: Draft Clinical Guidance* – is also available which provides additional guidance to health care providers.

1.1 Definitions

The purpose of this section is to provide a standard definition of virtual visits and related concepts.

Virtual Visits

For purposes of this standard, a virtual visit is defined as a digital interaction where one or more clinicians, including physicians, nurses or allied health, provide health care services to a patient or their caregiver.

Several virtual visit pilots across Ontario have demonstrated how virtual visits can improve clinical outcomes and improve patient satisfaction and convenience⁷.

A virtual visit can be supported using one or more modalities, including videoconferencing and secure messaging, and may involve one or more digital transactions.

This is demonstrated in the following three use cases:

- 1) A specialist performs a post-surgical follow-up assessment of a patient during a video visit previously scheduled by phone. The specialist asks the patient questions about their

² Please see: http://health.gov.on.ca/en/pro/programs/connectedcare/oht/docs/dig_health_playbook_en.pdf (August 2019)

³ <https://www.cpso.on.ca/Physicians/Policies-Guidance/Policies/Telemedicine>

⁴ <https://www.cpso.on.ca/Physicians/Policies-Guidance/Policies/Medical-Records>

⁵ <https://www.oha.com/Legislative%20and%20Legal%20Issues%20Documents1/Understanding%20Your%20Legal%20Accountabilities%20-%20A%20Guide%20for%20Ontario%20Hospitals%20-%202020%20FINAL.pdf>

⁶ <https://www.ontario.ca/laws/regulation/900965>

⁷ The Home Video Visit pilot (ended November 2019) evaluated direct-to-patient video visits. The eVisit Primary Care pilot (also known as Enhanced Access to Primary Care) evaluated patient-initiated virtual visits by videoconferencing, secure messaging or audio calls in primary care. eVisit Primary Care pilot evaluation results are available on OTN’s website.

recovery and visually inspects the surgical site for signs of infection. The specialist documents the visit in a Hospital Information System and a claim is generated for the visit.

2) A patient logs into an EMR-integrated patient portal and sends a secure message concerning a new rash to their primary care physician and includes an attached image of the affected area. The primary care provider reviews the message and image and provides advice in a written response. The following day, the patient sends a follow-up question, which the physician answers before closing the visit. The full secure messaging thread and image attachment(s) are automatically saved in the patient's medical record. The physician marks the visit as "billable," which initiates a claim for the visit.

3) A patient uses an online booking solution to schedule a routine video visit with a Registered Nurse as part of a remote monitoring program for Chronic Obstructive Pulmonary Disorder (COPD). During the video visit, the nurse reviews a summary of the biometric data recorded over the previous 30 days and has a discussion about COPD management strategies with the patient. Using a secure file transfer service, the nurse sends a COPD brochure to the patient. When the visit ends, the nurse documents the visit.

What is not a virtual visit?

- Use of an online appointment scheduling or patient documentation solution
- Manual or digital reviews or triage of patient requests
- Posting lab test results and other patient records on a patient portal
- Responses to administrative questions or clinical requests that require an in-person assessment
- Missed, cancelled or abandoned video visits before health care services are provided
- Digital interactions between two clinicians concerning a mutual patient⁸
- Collection of biometric data by a remote monitoring device

Virtual Visit Solutions

A virtual visit solution refers to one or more digital tools that support virtual visit services.

Some Point of Service systems, such as certified Electronic Medical Records or Hospital Information Systems, support virtual visit services through embedded videoconferencing or

⁸ This includes eReferrals, eConsults and case conferencing encounters. However, case conferencing encounters can be supported by videoconferencing solutions that meet the requirements outlined in this document.

messaging solutions that rely on the Point of Service system’s scheduling, patient portal or application, clinical documentation and claims processing capabilities.

Other stand-alone virtual visit solutions are intended to interoperate with Point of Service systems. These solutions may have their own independent scheduling, patient applications, documentation and claims processing services.

In Ontario, the benefits of interoperable solutions have been well-established in provincial digital and virtual care initiatives⁹. To support the efficient delivery of high-quality care, this document outlines requirements in alignment with the Ministry of Health’s Digital Health Information Exchange (DHIE) Policy.

While this document is limited to virtual visit solutions, health care organizations and clinicians are encouraged to consider solutions that can support clinical services beyond virtual visits. For example, a secure messaging service can support both virtual visits (patient encounters) and provider-to-provider collaboration.

1.2 Key Audiences

Key audiences for this document include:

- Ontario Health Teams
- Health care organizations
- Physicians and other healthcare providers
- Virtual Visits (videoconferencing and secure messaging) solution providers
- Point of Service application providers (e.g. EMRs, HIS vendors)

1.3 Scope

This document outlines requirements for digital solutions that support virtual visit services, through videoconferencing, secure messaging or a combination of modalities.

It is applicable to virtual visit solutions that support virtual visit services delivered by primary care, specialist, hospital and community service providers.

The document is divided into different sections:

- Section 2 outlines general requirements that apply to *all* virtual visit solutions
- Section 3 outlines requirements *specific* to videoconferencing solutions
- Section 4 outlines requirements *specific* to secure messaging solutions

⁹ For example, the eVisit Primary Care pilot evaluation found secure, EMR-integrated platform with an asynchronous messaging feature is critical for success in uptake and spread of virtual care.

- Section 5 outlines data requirements for *all* virtual visit solutions

Requirements may refer to one of the following users:

- Patient / caregiver users
- Clinical users (e.g. physicians, nurses, allied health professionals, administrator, triage administrator, consultant)
- Organizational users (e.g. Administrative staff)

All requirements are either mandatory “M” or recommended “R”.

Out of Scope

This document does not address the use of videoconferencing or secure messaging solutions for any of the following activities:

- Administrative activities
- Educational services
- Provider to provider communication
- Provincial eServices (eConsult or eReferral)

This document does not define requirements for telephone (audio-only) visits. However, virtual visit solutions offering voice over IP (VoIP) audio visits should comply with Section 2.0 (general virtual visit requirements).

2.0 GENERAL VIRTUAL VISIT REQUIREMENTS

This section outlines general solution, patient safety, privacy and security requirements that apply to all virtual visit solutions.

When selecting a virtual visit solution, health care organizations and clinicians should consider several factors including clinical suitability, workflow, patient preferences, in addition to relevant professional, regulatory and industry standards.

Professional standards¹⁰ that should be considered when selecting a virtual visit solution and delivering virtual care include the ability for healthcare organizations and clinicians to:

- Identify patients accurately
- Manage a patient's informed consent to receive care virtually¹¹
- Ensure patient information obtained virtually is sufficiently reliable and high quality
- Protect patient privacy and confidentiality
- Document virtual visit information in a medical, hospital or clinical record
- Ensure virtual visit information is readily available and accessible for patient care, quality assessments, investigations and billing reviews

Health care organizations and clinicians should consider patient needs when selecting a solution. Key considerations include educating patients about the service and solution they are using, enabling caregivers and other care team members to support or join the visit, and ensuring technical support services are available and easily accessible in the event a visit is interrupted.

Vendors should ensure virtual visit solutions and services are designed to enable healthcare organizations and clinicians to meet their relevant professional, regulatory and industry standards and obligations and designed to enable patients to receive safe, privacy and security enhanced virtual care and to access their health information.

An important part of the province's vision for virtual care is the meaningful integration of stand-alone solutions into providers' existing PoS systems. The minimum interoperability requirements stated below align with initiatives underway to improve Ontario's digital health infrastructure¹². Virtual visit solutions that demonstrate more mature levels of integration with PoS systems offer significant provider workflow benefits and support high-quality delivery of virtual care.

¹⁰ See, for example, the CPSO's Telemedicine Policy. <https://www.cpso.on.ca/Physicians/Policies-Guidance/Policies/Telemedicine> (November 2019)

¹¹ For example, the Canadian Medical Protective Association's has advised physicians to document a patient's informed consent for using videoconferencing to discuss sensitive patient health information. See: "Videoconferencing Consultations: When is it the right choice?" (October 2015). <https://www.cmpa-acpm.ca/en/advice-publications/browse-articles/2015/videoconferencing-consultation-when-is-it-the-right-choice>

¹² Please see the Ministry of Health's Digital Health Information Exchange Policy (August 2019) for more information

Health care organizations and clinicians should also consider whether solutions can support an appropriate level of patient and provider identity verification. Over time, approved solutions are expected to integrate with any future provincial identity services, such as a patient digital identity authentication and authorization (IAA) service.

2.1 General Solution Requirements

Priorities: (M)andatory; (R)ecommended

#	Requirement	Priority	Notes
2.1.1	Provide patients and their caregivers with secure access to virtual visit services	M	<p>Patients and caregivers should be registered users of a virtual visit service. Solutions should enable other clinical users to participate in virtual visits. Please see 3.2.8, 3.2.9 and 4.2.2 for related requirements specification</p> <p>The registration process should include processes for identity proofing and patient authentication.</p>
2.1.2	Allow clinical users to end a virtual visit	M	<p>Clinical users determine when a virtual visit is complete.</p> <p>Solutions must not default to ending a video or secure messaging visit based on elapsed time or number of transactions.</p> <p>Patients and/or caregivers must also be allowed to end a virtual visit; however, it will not be formally documented as a completed visit in the virtual care solution unless the provider does so.</p>

#	Requirement	Priority	Notes
2.1.3	Capture information about a virtual visit to meet clinical, record keeping or reporting obligations	M	<p>Solutions must record any information that is relevant for clinical documentation and record keeping purposes, as detailed in Sections 5.1 and 5.2.</p> <p>At a minimum, solutions will capture:</p> <ul style="list-style-type: none"> • Event summary (e.g. event ID, start and end date and time); • Any messages, files or images that were exchanged during the patient encounter; and • Any clinical documentation or notes <p>Solutions must record sufficient information to associate the virtual visit information with a specific patient record.</p>
2.1.4	Enable the electronic transfer of virtual visit information to a medical or hospital record	M	<p>Virtual visit information (as defined in 2.1.3) must be transferable to a medical record or hospital record for clinical documentation and audit purposes.</p> <p>Solutions may also allow clinical users to select clinically relevant chat messages, files attachments or images that should be transferred to the patient’s medical or hospital record.</p> <p>A minimal event log must be retained which describes the event, event participants,</p>

#	Requirement	Priority	Notes
			timestamp and if any data was deleted as a result of a data exchange.
2.1.5	Make technical support services available to clinical users	M	<p>Vendors offering virtual visit services must provide reasonable technical support to organizations and clinicians as part of their Service Level Agreement (SLA).</p> <p>Organizations offering virtual visit services must ensure reasonable technical support services are available to patients.</p> <p>Contact information for technical support should be easily accessible by patients.</p>
2.1.6	Enable authorized users to extract data for reporting purposes	M	Solutions must make virtual visit data available to support organizational and system level reporting. See Sections 5.1 & 5.2 for minimum data elements.
2.1.7	Enable patient notification when virtual visit services are unavailable	M	<p>Solutions must allow health care organizations and clinical users to notify patients when virtual visit services are unavailable.</p> <p>Potential scenarios include</p> <ul style="list-style-type: none"> • After hours / weekends • Vacation / leave • Technical issues <p>Solution should indicate to patient if messages were</p>

#	Requirement	Priority	Notes
			received or failed during transmission.
2.1.8	Manage patient agreements for virtual visit services	R	Solutions should allow clinical users to send and receive patient agreements and other educational materials relating to virtual visit services.
2.1.9	Meets Web Content Accessibility Guidelines (WCAG) 2.0 Level AA ¹³ requirements	R	Solutions should have web and user interfaces that provide accessibility to Ontarians with disabilities; and comply with the Accessibility for Ontarians with Disabilities Act (AODA) ¹⁴ .
2.1.10	Provide seamless integration with Point of Service systems	R	Stand-alone solutions should demonstrate seamless integration, which should include elements such as: <ul style="list-style-type: none"> • Single sign-on with PoS login credentials • Receiving patient context (identification) information from PoS systems • Automatically sending clinical information to PoS patient records as discreet data • Sending virtual visit notifications to the PoS • Calendar information
2.1.11	Support identification of virtual visits eligible for claims submission	R	Solutions should not automatically trigger claims submission for all completed virtual visits.

¹³ <https://www.w3.org/WAI/standards-guidelines/wcag/>

¹⁴ <https://www.ontario.ca/laws/statute/05a11>

#	Requirement	Priority	Notes
			Solutions can assist clinical users to identify virtual visits that are eligible for claims (e.g. offering a “billable” vs “nonbillable” flag).
2.1.12	Provide automated verification of patient's Ontario Health Insurance Plan (OHIP) number	R	<p>Automated OHIP verification can assist clinical users from a claims and medico-legal perspective. It can also make patient registration processes more efficient.</p> <p>Solutions should verify that 10-digit number format is valid.</p> <p>Solutions can also:</p> <ul style="list-style-type: none"> • Verify that number is associated with patient • Verify that OHIP number is valid through MOH verification
2.1.13	Support distribution of patient surveys	R	<p>Virtual Visit solutions will allow providers to trigger survey distribution to patients to:</p> <ul style="list-style-type: none"> • Administer certain types of clinical questionnaires prior to an encounter (e.g. relating to mental health, child development, post-operative care) • Support quality improvement efforts and patient experience reporting (e.g. at the end of a virtual care encounter)

#	Requirement	Priority	Notes
2.1.14	Provide ability for virtual visit information to be shared with patients and their caregivers	R	Solutions should allow clinical users to securely share notes with patients after the visit has ended.
2.1.15	Enable verification of provider identity using a provincial identity management service	R	<p>Solutions should integrate with provincial provider identity and access management services and Ontario Identity Access Management (ONEID) using latest standards (e.g. OAuth)</p> <p>Once available, solutions should integrate with the provincial patient digital Identity Authentication and Authorization (IAA) services.</p> <p>Future versions of the standard will provide further guidance.</p>
2.1.16	Will support Canadian English and Canadian French languages	R	Solutions will support both Canadian English and Canadian French.

2.2 Privacy and Security

Privacy

Virtual visits generally involve the use of technology and the collection, use, disclosure and transmission of personal health information (PHI) and personal information (PI) over the Internet. As a result, vendors and once procured, healthcare organizations and clinical users delivering virtual visits must be able to demonstrate that solutions and services leveraged to deliver virtual care are designed to support privacy and security enhanced virtual visits in accordance with applicable laws, regulatory and industry standards. These include but are not limited to the *Personal Health Information Protection Act*, *Freedom of Information and Protection of Privacy Act* and other relevant legislation.¹⁵

¹⁵ Other Legislation that may apply to vendors include the Personal Information Protection and Electronic Documents Act (PIPEDA) and Canadian Anti-Spam Legislation (CASL).

Maintaining privacy while delivering care using virtual visit solutions involves unique challenges that can lead to a poor virtual care experience and unintended breaches. Below are examples of unintended breaches that organizations, clinical users and vendors should be aware of and prevent:

Video

- Scheduling or appointment confirmation or reminder notification includes an excessive amount of PHI
- Video launches from a public space
- Wrong patient being invited to participate in a video virtual visit
- Wrong patient attending a video virtual visit
- Wrong clinical user invited to or attending a multipoint video virtual visit
- Video virtual visit launched in error after a patient virtual visit is cancelled
- Sharing information (e.g. test results) for the wrong patient during a video virtual visit
- Clinical users or staff given unauthorized access during an encounter or to the videoconferencing system
- A video virtual visit is recorded without authorization

Secure Messaging

- Messages containing PHI sent to the wrong patient
- Attaching personal health information for the wrong patient to a message
- Unauthorized clinical users reviewing patient requests and messages without their consent
- Unauthorized clinical users copied on a message sent to a patient

Organizations and clinical users can mitigate many of these risks by implementing appropriate privacy and security policies, procedures and practices. Certain risks can also be mitigated by selecting virtual visit solutions that meet a minimum set of privacy and security requirements (outlined in Section 2.2.1). This includes taking reasonable steps to confirm that technologies used by patients enable PHI to be shared in a private and secure manner¹⁶.

¹⁶ See the CPSO's Telemedicine Policy. <https://www.cpso.on.ca/Physicians/Policies-Guidance/Policies/Medical-Records> (November 2019)

Information Security

Health care organizations and clinical users should ensure their virtual visit solution providers will deliver information security services as part of their service obligations. For example, virtual visit solutions must have information security safeguards such as access to information, security incident response, encryption, logging & monitoring, operational procedures and other mechanisms.

Virtual visit information security services will comply with applicable requirements described in the Ontario Health EHR Security Toolkit¹⁷ which is aligned with OntarioMD's [EMR Hosting Requirements](#).

Solution providers will formally describe and commit to delivering information security safeguards to the health care organizations and clinical users implementing their virtual visit solutions.

2.3 Privacy and Security Requirements

Priorities: (M)andatory; (R)ecommended

2.3.1	Publish a notice of its information practices relevant to its virtual visit solution and services	M	At a minimum the notice must describe how the vendor handles and protects personal and health information and privacy rights of patients.
2.3.2	Have a designated employee responsible for privacy	M	Contact information for the designated privacy official must be publicly accessible on the vendor's website.
2.3.3	Have a privacy and security program that includes policies and procedures	M	At a minimum, vendors must have a privacy policy that outlines rules governing the collection, use, disclosure, retention, accuracy, security and disposal of PHI/PI, breach management, information security, business continuity and disaster recovery, access, correction and complaint practices.
2.3.4	Provide an electronic audit trail of all virtual visit encounters including a log of all accesses and transfers of personal health information	M	Audit records must record and retain information about virtual visit transactions (e.g. event ID, start and end date and time) as detailed in Sections 5.1, 5.2 and 5.3.

¹⁷ (<https://www.ehealthontario.on.ca/en/support-topics/EHR-security-toolkit/policies-and-standards>)

Audit records must include visits that were interrupted or abandoned for technical reasons.

Solutions that retain encounter summary records must maintain an audit log that includes:

- Type of information viewed, handled, modified or otherwise dealt with;
- Date and time it was viewed, handled, modified or otherwise dealt with;
- Identity of all persons who viewed, handled, modified or otherwise dealt with the personal health information; and
- Identity of the individual to whom the personal health information relates;

Data in the audit log must not be altered, removed or deleted, just marked as altered, removed or deleted.

2.3.5 Provide audit security controls to maintain audit integrity

M

Audit trail will include all login attempts whether successful or failed.

Must log traffic that indicates unauthorized activity encountered at the application server.

The log must include:

- Timestamp, user ID/application ID, originating IP address, port accessed or computer name
- External ODBC connections used to execute SQL or data layer queries
- Application data stored external to the database such as attachments

			<ul style="list-style-type: none"> • All data files used to meet other local requirements (e.g., reporting requirements) • System time must be synchronized with a trusted source to maintain audit trail integrity • Be protected to ensure audit integrity and from unauthorized access, modification and destruction
2.3.6	Put in place reasonable safeguards and controls to protect all data, whether in transit or at rest.	M	<p>Solutions must use current industry standard cryptographic and hashing mechanisms to encrypt and safeguard personal health information and/or personal information.</p> <p>Recommended cryptographic standards include: NIST SP 800-22 Revision 1a - A Statistical Test Suite for Random and Pseudorandom Number, FIPS 140-2 - Security Requirements for Cryptographic Modules.</p>
2.3.7	Provide an up-to-date Privacy Impact Assessment (PIA) summary.	M	<p>PIA assurances and requirements must include:</p> <ul style="list-style-type: none"> • PIA must have been completed within the last two years of seeking to participate in the Verification process. • PIA must have been completed by a certified professional with any of the following credentials: obtained through the International Association of Privacy Professionals (IAPP): Certified Information Privacy Professional (CIPP/C); Certified Information Privacy Manager (CIPM); Certified Information Privacy Technologist (CIPT) or with a minimum of two years of experience conducting privacy impact assessments in Ontario and/or Canada. • The PIA methodology must include a legislative analysis relevant to Ontario and its healthcare context and at a

minimum have been completed mapped to the ten Fair Information Principles as published by the Canadian Standards Association (CSA) Model Code for the Protection of Personal Information and in accordance with the PIA guidelines issued by the Information and Privacy Commission of Ontario¹⁸ with respect to healthcare.

- The PIA and PIA summary must include a table of content, a summary of risk findings including a likelihood and impact table or risk heat map, a mitigation plan and a status on any outstanding risks as well as the name and contact information of the individual(s) and/or organization who conducted the PIA. Any risks identified as high must be mitigated prior to a vendor being listed as a verified vendor. Risks assessed as medium must have a clear mitigation plan with timelines for closure within six months of risk being identified.
- PIA and risk mitigation plan must be approved by the solution vendor's authorized representative of the organization or Chief Privacy Officer and summary shared with and reviewed by Ontario Health.
- Must be based on the latest solution design and technical architecture for the virtual visit solution with no significant changes to the solution, services or privacy program since the completion of the PIA.
- PIAs must be refreshed every 3 years or when there has been a change in the solution, legislation, policy or business operations of the solution provider(s)

¹⁸ <https://www.ipc.on.ca/wp-content/uploads/2015/05/Planning-for-Success-PIA-Guide.pdf>

that may have an impact to the privacy of health information or to privacy rights.

2.3.8	Provide an up-to-date application level Threat Risk Assessment (TRA)	M	<p>TRA assurances and requirements must include:</p> <ul style="list-style-type: none">• TRA must have been completed within the last two years being relevant to the virtual visit solution submitted to this process with no significant changes to the solution, services or security program since the completion of the TRA.• Confirmation that the TRA was performed by a qualified assessor with a minimum of five years of direct full-time security experience and in possession of a CISSP certification in good standing.• The TRA must have been completed with a security analysis based on an industry-standard threat risk assessment methodology (e.g. HTRA, NIST, OCTAVE).• The TRA and summary must include a summary of risk tables and a status of the risks. Any risks identified as very high or high must be mitigated prior to a vendor being listed as being verified. Medium risks will show clear mitigation plans for closure within 6 months of these risks being identified. It is recommended that low risks be identified, monitored and closed where practical and summary shared with and reviewed by Ontario Health.• The TRA must refreshed every 3 years or when there is a change in the solution, legislation, policy or business operations of the solution provider(s) that may have an impact to the privacy and/or security of health information or to privacy rights.• The TRA must include the results of a vulnerability scan and penetration test.
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2.3.9	Perform periodic vulnerability assessment scans	M	<p>Vulnerability assessment scans are to be done at a minimum on a quarterly basis or when there has been a major software release, change in architecture or infrastructure.</p> <p>Vulnerability scans must include the application and application infrastructure. For hosted environments, the hosting provider may need to submit their own VA scan results.</p> <p>Latest vulnerability scan results are to be submitted with the TRA. Evidence that quarterly scans have been completed may be requested within the TRA refresh cycle.</p>
2.3.10	Perform periodic penetration tests	M	<p>Penetration tests are to be done, at a minimum, on an annual basis or when there has been a major software release, change in architecture or infrastructure.</p> <p>Penetration tests must include the application and application infrastructure where possible. For hosted environments, the hosting provider may need to submit their own penetration test results.</p> <p>Latest penetration test results are to be submitted with the TRA. Evidence that annual tests have been completed may be requested within the TRA refresh cycle.</p>
2.3.11	Meet security and privacy controls	M	<p>Solution provider must follow general security guidance based on ISO 27002 control objectives. Please refer to the Ontario Health's Security Toolkit and OntarioMD's Hosting Requirements for requirements related to application security, infrastructure, business operations and business continuity. Other security certifications such as SOC2, Hitrust,</p>

OntarioMD, Canada Health Infoway can assist in meeting this requirement.

Control Objectives:

- Network and Operations
- Physical Security
- Acceptable Use of Information and Information Technology
- Access to Control and Identity Management for System-Level Access
- Information Asset Management
- Information Security Incident Management
- Threat Risk Management
- Business Continuity
- Cryptography
- Security Logging and Monitoring
- Electronic Service Provider

2.3.12 Provide a comprehensive agreement framework for the virtual visit solution and related services including for any third party it retains to assist in providing these services

M

Solution and third party provider agreements will at minimum include privacy and security language that describes the services and the administrative, technical and physical safeguards relating to the confidentiality and security of PHI and PI and how the vendor and any third-party vendor retained comply with applicable legislation including but not limited to those listed above.

2.3.13 Support healthcare organizational or clinician retention obligations and policies

M

Solutions facilitate or enables the collection and retention of PI and PHI the solution must retain the PI and PHI in accordance with record keeping and retention obligations and policies.

The solution must retain data in accordance with applicable laws or standards.

In the absence of an existing retention policy, it is recommended that clinicians follow applicable regulatory and/or professional standards such as the CPSO data retention

and destruction guidance within the medical records management policy.

2.3.14	Ensure all virtual visit data is held by systems located in Canada	M	Solution must be hosted and managed within a Canadian data center including all solution data and backups.
2.3.15	Inform users including patients if some solution data flows outside of Canada	M	Access and transient data containing PHI may flow outside of Canadian borders with prior consent from the user.

3.0 VIDEOCONFERENCING VISITS

This section lists solution requirements for synchronous videoconferencing virtual visit solutions.

A synchronous video virtual visit involves an encounter between one or more clinical users (“consultant”) and a remotely located patient at a specific day and time. Clinical users and patients join video visits using endpoint devices, such as video monitors, laptops, tablets or mobile phones.

A patient may participate in the visit from home or another chosen location using a device they operate independently (“direct-to-patient video visit”). Alternatively, a caregiver or clinician may assist the patient in accessing care virtually by providing a device, and / or initiating and managing the video visit (“supported video visits”).

Other patients may be located at a secure physical environment that provides them with onsite access to technology and, in some cases, clinical support services (“hosted video visit”). Please see section 3.3 for more information about hosted visits.

Video virtual visits can either be point-to-point (2 endpoints) or multipoint (3 or more endpoints). A single video virtual visit may be scheduled for multiple patients (“group video visit”).

Videoconferencing may also be used by two or more clinical users to discuss and direct the management of an individual patient’s care (“case conferencing”)¹⁹.

In addition to video media, a video virtual visit may also involve the exchange of text, documents, images or biometric data through secure messaging, file transfer or screen-sharing tools.

¹⁹ While case conferencing encounters are not virtual visits, they can be supported by videoconferencing solutions that meet the requirements outlined in this document.

Health care organizations and clinical users should ensure videoconferencing solutions can support a secure, uninterrupted clinical encounter. Unauthorized user access to a video event can be avoided by requiring user authentication to access the video event (e.g. password-protected portal) or other security controls for video visits accessible by a URL within emails or calendar entries. In addition to these controls, patient identity can be verified during the video event through manual facial recognition or OHIP card display.

Videoconferencing solutions can also support audio-only encounters (no visual input). In some situations, audio only visits may be an acceptable alternative to video visits, especially if insufficient bandwidth is available.

3.1 Video Visit - Use Cases

Use Case	Description
<p>Direct-to-Patient</p>	<p>A family physician uses their EMR to initiate a scheduled video visit with a patient, who connects using an application on their mobile phone. The physician and patient discuss the patient’s response to a new medication and agree to a follow-up visit in two weeks. The physician ends the call, documents directly into their medical record and submits a claim for the visit.</p>
<p>Supported Video Visit</p>	<p>A registered nurse from an Integrated Community Care team schedules a video visit with a geriatrician prior to visiting a patient at home. At the appointment time, the Registered Nurse logs into her tablet from the patient’s home and initiates the video visit, which the geriatrician joins from their desktop. Once connected, the RN positions the tablet so the geriatrician can interact directly with the patient. When the geriatrician closes the visit, both clinicians document the encounter and the geriatrician submits a claim for the visit.</p>
<p>Hosted Video Visit</p>	<p>A surgeon’s administrative assistant schedules a follow-up video visit at a community hospital, supported by a telemedicine nurse, near the patient’s home in northeastern Ontario. At the appointment time, the surgeon initiates the visit from their HIS calendar and the nurse connects through their room-based video system. The nurse introduces the patient and uses a medical peripheral to facilitate the surgeon’s visual inspection of the surgical site. Both the surgeon and nurse document in their client records and the surgeon submits a claim for the visit.</p>

Use Case	Description
Case Conferencing	A multi-disciplinary cancer conference coordinator (MCC) schedules a multi-point rounds meeting between an oncologist and several allied health care professionals based in a hospital and family health team. The MCC initiates the visit from their laptop and the other clinicians use either desktop or laptops to initiate the visit by selecting a URL and entering a security PIN. The MCC leads a discussion of the treatment of several patients. Once the discussion finishes, the MCC ends the call and documents the outcome.
Group Video Visit	A psychologist initiates a scheduled group video visit as part of a group cognitive behavioural therapy (CBT). Each patient accesses the video visit by using their mobile phone or laptop to login to the hospital's patient portal and requesting access to the video session. The psychologist authorizes each patient to join the call based on their first name. The first names of the nine patients who join the group visit are displayed to help the psychologist facilitate the group discussion. At the end of the session, the psychologist ends the session and documents the group visit.

3.2 Video Visits - Solution Requirements

Priorities: (M)andatory; (R)ecommended

#	Requirement	Priority	Notes
3.2.1	Enable unique video visits	M	Solutions must assign a unique event ID to each video visit.
3.2.2	Enable scheduled video visits	M	Solutions must allow clinical users to schedule a video visit for a future date and time.
3.2.3	Enable unscheduled (immediate) video visits	M	Solutions must allow clinical users to initiate video visits in real-time.
3.2.4	Enable point-to-point video visits	M	Solutions must support video visits between a clinical user and another user endpoint.

#	Requirement	Priority	Notes
3.2.5	Enable multipoint video visits	M	Solutions must support video visits between a clinical user and two or more user endpoints.
3.2.6	Deliver a high level of video experience via commonly available network bandwidths	M	<p>Solutions must support high resolution and high framerate content sharing.</p> <p>Min Content Resolution: 1024x768</p> <p>Min Content Framerate: 5 fps</p> <p>At a minimum, video solutions must support:</p> <p>Minimum Resolution: 448p Minimum Framerate: 15fps</p>
3.2.7	Enable clinical users to manage video visits	M	<p>Solutions must provide clinical users with configurable options for managing the video visit.</p> <p>This must include:</p> <ul style="list-style-type: none"> • Initiating visits • Managing participant access • Disabling features such as video recording, transcripts, and file transfer • Ending the visit (clinician host will determine end of virtual care session)
3.2.8	Enable clinical users to invite a guest user to a video event	M	<p>Solutions must offer a mechanism for guest users such as caregivers or care team members to join a video visit.</p> <p>For non-registered or guest users, additional security and privacy controls are required.</p>

#	Requirement	Priority	Notes
			<p>This must include:</p> <ul style="list-style-type: none"> • Invites and invite URLs are encoded and unique (e.g. they cannot be easily reversed engineered and are not reused) • Virtual visits should have the option to be protected with a password or PIN <p>Additional recommended controls include:</p> <ul style="list-style-type: none"> • The Invite URLs expire within a given time frame or become invalid if it's not within a scheduled period • If there are multiple participants, the invite URLs can only be used by the invited participant • Virtual visits passwords should not be shared through non-secured channels (e.g. e-mail)
3.2.9	Prevent unauthorized entry to an ongoing virtual visit event.	M	<p>Access controls include restricting access to authenticated users or providing a PIN, password or secured token to unauthenticated users.</p> <p>Solutions should display participant names to the video visit host.</p>
3.2.10	Enable users to share files or documents	M	Solutions must support content sharing relating to the encounter. Possible options include screen-sharing or secure file transfer.

#	Requirement	Priority	Notes
3.2.11	Support industry standard encryption for real-time communications	M	<p>Recommended encryption standards for real-time communication protocols include:</p> <ul style="list-style-type: none"> • H323: (H.235 for H.323 media encryption, AES) • SIP:(DTLS SRTP, TLS 1.2 or higher) • WebRTC: (DTLS SRTP)
3.2.12	Enable a virtual waiting room	R	Solutions may enable clinical users to enable a waiting room. This allows clinical users to control when participant(s) join the synchronous video event.
3.2.13	Enable clinical users to export a secure calendar entry and URL for scheduled video visits	R	Solutions should enable scheduled video visits to be integrated in external calendaring systems of other clinical users (e.g. HIS, EMR, Outlook).
3.2.14	Provide a visual indicator of poor call quality to all participants in an ongoing video virtual visit event	R	None
3.2.15	Provide an audio-only option	R	An audio visit may be an acceptable alternative if insufficient bandwidth is available to support a video visit.
3.2.16	Provide the ability to switch audio and/or video inputs (USB peripherals) during an active video visit event	R	Solutions should allow different audio and video sources to be used during an event. For example, the clinical user could use a standard webcam and a hand-held exam camera in the same event.

#	Requirement	Priority	Notes
3.2.17	<p>Provide additional data for operational statistics and information</p> <p>This data could include:</p> <ul style="list-style-type: none"> • Negotiated media codecs • Role of each participant (host, guest) in the event. • Performance data such as packet loss, jitter. 	R	<p>Operational data is used to identify technical issues and support requirements for end-user support.</p> <p>A common issue that would require investigation is degraded video and audio during a video visit.</p>
3.2.18	Enable a videoconferencing endpoint to be added to a video virtual visit event using a dialing alias	R	Dial String Format: H.323 ID, E.164 or SIP URI
3.2.19	Provide equipment and connectivity testing	R	Solutions will allow patients and caregivers to perform equipment (i.e. audio and/or visual) and connectivity tests (i.e. Wi-Fi) and send reports to clinics prior to virtual visits.
3.2.20	Enable patient to save a virtual visit calendar entry and URL to their virtual calendar application	R	Solutions will enable patients to import a scheduled event into their calendaring systems (e.g. Google calendar, Yahoo calendar, Hotmail calendar, Outlook). Solutions will enable patients to forward a scheduled event to caregivers to participate in the event.

3.3 Hosted Video Visits - Solution Requirements

This section lists additional requirements for hosted video visits.

A hosted video visit is a point-to-point or multipoint videoconferencing encounter where the patient is physically located at a regulated health care facility or equivalent organization (“host site”). In Ontario, patients currently receive care at over 1,500 host sites. Many of these sites are

located in Northern and rural communities and provide patients with access to nursing supports and peripheral technologies.

Hospital and specialist providers purchasing non-OTN videoconferencing solutions must ensure they can continue to schedule, initiate and manage hosted video visits. For some patients, a hosted video visit may be more appropriate than a direct-to-patient video visit. Some examples include:

- The patient requires support accessing appropriate videoconferencing equipment or internet connection
- The patient is receiving intensive or residential care at the host site
- The consulting clinician has a clinical protocol requiring the videoconferencing event to take place at a secure, supportive physical environment
- The consulting clinician requires a clinical assessment be performed on the patient by a telemedicine nurse, which may involve the use of a peripheral device such as an electronic stethoscope or ENT scope

Support for hosted video visits involves coordinated scheduling with host site organizations who support events initiated by multiple consulting providers. To maximize stability and the patient/provider experience, OTN Video is currently the only video solution that supports visits at host sites. OTN will be working with partners to pilot flexible mechanisms for connecting to the host site network.

Hospital and specialist providers are advised to select video solutions that can support the requirements below. The requirements will be updated once host site connectivity specifications are confirmed.

Priorities: (M)andatory; (R)ecommended

#	Requirement	Priority	Notes
3.3.1	Enable clinical users to import and launch a video visit from a secured iCalendar data source	R	Enables health care organizations and clinical users to launch a secure video visit
3.3.2	Enable clinical users to support interoperable video visits with sites using codec-based videoconferencing systems and peripheral devices	R	Supported Interoperability Protocols: H.323, SIP, WebRTC Audio Protocols: G.711(a/μ), G.719, G.722, G.722.1, G.722.1 Annex C, Siren7™, Siren14™, G.729, G.729A, G.729B, Opus, MPEG-4 AAC-LD, Speex, SILK, AAC-LC Video Codecs:

#	Requirement	Priority	Notes
			H.261, H.263, H.263++, H.264 (Constrained Baseline Profile, Baseline Profile and High Profile), H.264 SVC (UCIF Profiles 0, 1) VP8, VP9
			Content Sharing: H.239 (for H.323) BFCP (for SIP) VP8, VP9 (for WebRTC high framerate)
			Firewall Traversal: H323 – H.460.17, H.460.18, H.460.19 SIP/WebRTC: STUN, TURN, ICE

4.0 SECURE MESSAGING VIRTUAL VISITS

This section lists requirements for secure messaging virtual visit solutions.

A secure messaging virtual visit is a clinical encounter in which a patient and clinician exchange messages about a particular medical issue. It does not include videoconferencing between the patient and clinician as this would be classified as a virtual video visit instead.

A secure messaging virtual visit can be initiated by a patient (“patient initiated visit”) or by a clinician (“clinician initiated visit”). The exchange of messages can be “synchronous” or “asynchronous”. With synchronous messaging, the patient and clinician are connected at the same time and exchange messages back and forth during the session. With asynchronous messaging, when a message is sent, the receiver is notified and responds at a later time. Each secure messaging virtual visit typically involves one or more messages sent by both the clinician and patient.

A virtual visit solution must support patient initiated virtual visits. Pilot evaluation results also strongly support clinician initiated visits. Solutions must support bidirectional communication between patients and one or more clinicians, including follow-up questions and responses.

Virtual visits performed using secure messaging involve the collection, use and disclosure of personal health information. Unlike videoconferencing events, where patient identity can be confirmed during the encounter, health care organizations and clinicians must select a solution that offers mechanisms to both register and authenticate patients and their caregivers.

A secure messaging solution can be used to interact with patients regarding both clinical and administrative matters. In the eVisit Primary Care pilot, qualified solutions enable their users to identify whether a set of messages is “billable” or “non-billable” for physician reimbursement purposes within the pilot. Solutions that are intended to support the communication of medical assessments and advice should provide their clinical users with a similar mechanism to ensure appropriate claims submissions. Please monitor the Ontario Virtual Care Program billing manual and recent INFOBulletins for up-to-date information about virtual care services which are eligible for reimbursement and any associated requirements.

The following patient-facing digital tools offer value but the functionality that they provide does not meet the minimum requirements of a virtual visit:

- Online appointment scheduling services
- Portals that provide online access to health records
- Solutions that support completion of documentation by patients
- One-way clinician initiated communication (I.e. notifications)

Online messages can be complex to secure adequately, particularly where messaging occurs between disparate solutions. It is recommended that digital planners consider solutions that achieve requisite levels of security in simple ways including, for example, software-as-a-service (cloud-based) solutions, provincial (Digital Health Service Catalogue) solutions or portal-based solutions.

4.1 Secure Messaging Virtual Visit - Use Cases

Use Case	Description
<p>Patient Initiated Virtual Visit</p>	<p>A patient experiencing chills, fatigue and congestion opens an application on their phone and initiates a visit by sending a message to their physician. The patient is prompted to enter their symptoms, which are shared with the physician. The physician reviews the symptoms and sends a response with additional questions. The patient responds with information and an attached image of their temperature reading. The physician provides medical advice to the patient. The physician closes the visit and saves the encounter summary in the patient’s record.</p>
<p>Clinician Initiated Virtual Visit</p>	<p>A family physician receives a blood test result showing low thyroid levels for a patient on thyroid medication. The physician uses their EMR to send the patient a message advising them of the result and requesting the patient respond with information about missed doses or</p>

low thyroid symptoms. The patient responds the following day, reporting fatigue and constipation and asking a question about when the medication should be taken. The physician answers the question and advises the patient to fill a new prescription at an increased dose. The physician closes the visit. The message thread is automatically saved in the patient's record.

4.2 Secure Messaging Virtual Visit – Solution Requirements

Priorities: (M)andatory; (R)ecommended

#	Requirement	Priority	Notes
4.2.1	Protect messages exchanged between clinician users and patients	M	Solutions must protect messages by means of secure infrastructure or equivalent cloud services.
4.2.2	Enable unique secure messaging visits	M	Solutions must assign a single unique ID to all secure messaging transactions associated with the visit.
4.2.3	Ensure secure messaging services are only accessible by authenticated users	M	Solutions must ensure secure messaging based virtual visit services are only accessible to authenticated patients and caregivers.
4.2.4	Enable registered patients and their caregivers to initiate a virtual visit about a health issue or concern	M	Solutions must enable registered patients to send a clinician a secure message about a health issue or concern. This can be achieved by sending a message to a care team member for review.
4.2.5	Enable configurable user notifications to alert clinical users and patients	M	<p>Clinical users and patients should be notified when there has been a change in the status of the virtual visit.</p> <p>Some examples include:</p> <ul style="list-style-type: none"> • New visit request • Accepted visit

#	Requirement	Priority	Notes
			<ul style="list-style-type: none"> Cancelled visit Completed visit
4.2.6	Allow patients and their caregivers to attach and send files to a clinician to support their virtual visit	M	Some health issues or concerns require patients to submit supporting documentation or images to support completion of the visit.
4.2.7	Allow different clinical user roles to manage patient virtual visit messages	M	Solutions must enable clinical users to configure how patient virtual visit requests are reviewed and managed. This might involve manual or automated triaging of patient requests.
4.2.8	Enable clinical users to record all messages, files and images associated with each individual virtual visit	M	Solutions must logically group multiple message transactions relating to a single visit. Information should be recorded in a chronological format. Solutions may allow clinical users to select which file or image attachments should be recorded in the patient record.
4.2.9	Enable clinical users to initiate secure messaging virtual visits	M	Messaging must be bi-directional between clinical users and patients.
4.2.10	Separate clinical and administrative messages	R	Clinical user experience and efficiency can be improved by creating separate inboxes (groups) for administrative versus clinical messages.
4.2.11	Enable multiple authorized clinical users to participate in a secure messaging visit	R	Solutions should allow other care team members to join in a secure messaging visit. This can include reading or creating messages.
4.2.12	Allow clinical users to flag patient messages as urgent or requiring attention	R	Physicians participating in the provincial pilot identified the ability to flag patient messages for review as important for triaging and care team collaboration purposes.

#	Requirement	Priority	Notes
4.2.13	Provide a read receipt for messages that can be filtered	R	Physicians participating in the provincial pilot identified this feature as important in order to confirm that medical advice has been received before a visit can be completed.

5.0 VIRTUAL VISITS – DATA REQUIREMENTS

The following minimum data requirements have been developed to support consistent health information exchange, reporting and audit of virtual visit activity.

The minimal requirement is an event summary that provides information about the organization, solution, modality of each unique virtual visit and the day and time it occurred.

Some virtual visit solutions may capture additional encounter summary information, including patient identifiers and consultation notes.

Ontario Health has developed data guidance, with field definitions and sample values, to support implementation of these data requirements.

Please refer to the document [Virtual Visit Data Guidance](#)²⁰ for further details.

5.1 Mandatory Virtual Visit Data Elements

#	Data	Requirement
5.1.1	Event ID	Unique identifier for each virtual visit
5.1.2	Organization ID	Organization that provisioned the account
5.1.3	Solution ID	Unique identifier for the solution that supported the virtual visit

²⁰ <https://otn.ca/wp-content/uploads/2020/09/virtual-visit-data-guidance.pdf>

#	Data	Requirement
5.1.4	Event Details	<ul style="list-style-type: none"> • Event Start Date • Event Start Time • Event End Date • Event End Time
5.1.5	Event Type	Event Type
5.1.6	Clinical User Information (Event Host)	<ul style="list-style-type: none"> • First Name • Last Name
5.1.7	Physician Flag	Physician Flag
5.1.8	Clinical User Location (Event Host)	Postal Code
5.1.9	Participant Location (patient)	Postal Code
5.1.10	Modality Used	Primary Modality

5.2 Recommended Virtual Visit Data Elements

5.2.1	Therapeutic Area of Care	Area of Practice
5.2.2	Name of Regulatory College	Name of Regulatory College
5.2.3	Professional Registration Number	Professional Registration Number
5.2.4	Clinical Provider Location (Event Host)	IP Address
5.2.5	Participant Location (participants)	IP Address
5.2.6	Participant Location (patient)	IP Address
5.2.7	Participant Identification (patient)	Participant's name, date of birth, gender and unique identifier i.e. Health card number
5.2.8	Event Outcome	Event Outcome

5.3 Virtual Visit Data Elements for Audit

#		
5.3.1	Create Date	Date the Event was created
5.3.2	Last Modified Date	Date the event record was last modified
5.3.3	Event Actor	Author of the event creation or last modification

APPENDIX

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