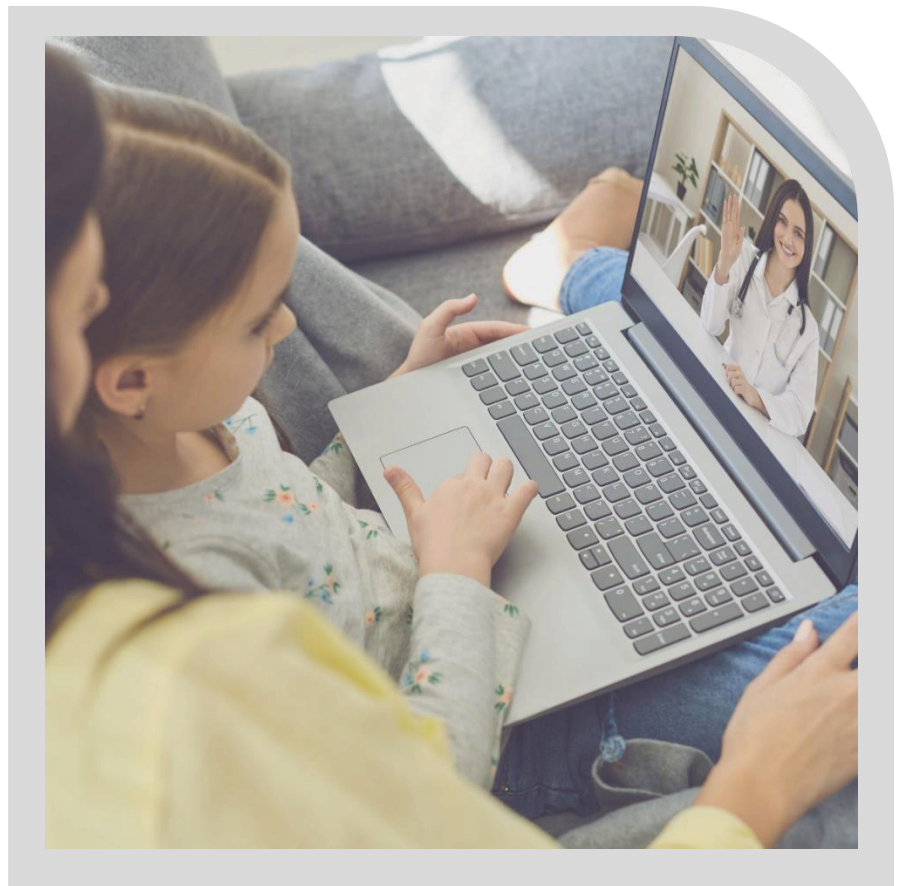


INFORMATION SHEET ON VIRTUAL MEDICINE ACROSS PROVINCIAL AND INTERNATIONAL BORDERS



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VIRTUAL MEDICINE ACROSS PROVINCIAL AND INTERNATIONAL BORDERS

Virtual Medicine refers to the provision of medical care by means of electronic communication (telephone, video, email, or text) where the patient and the member are at different locations, including but not limited to treating, advising, interviewing, or examining the patient.

This document is CPSM's interpretation of the legislation regarding virtual medicine across provincial and international borders. **CPSM considers the location of the patient determinative to where the practice of medicine occurs. CPSM regulates every person practicing medicine, whether virtual or in-person, on any patient located in Manitoba.**

This document is separate from the [Standard of Practice for Virtual Medicine](#) (effective November 1, 2021) which applies to all CPSM members engaging in virtual medicine.

Physicians Not Registered with CPSM and Seeking to Practice Virtual Medicine in Manitoba

Full (practicing) class registration in Manitoba is required for those physicians registered in another province or a jurisdiction outside of Canada who are seeking to practice virtual medicine for any patient located in Manitoba. This applies whether treating Manitoba patients for insured or non-insured services.

Currently, there is no separate virtual medicine registration in Manitoba for treating Manitoba patients.

CPSM Members Delivering Critical Test Results or Urgent Information

CPSM members must deliver critical test results or other urgent information to the patient regardless of the patient's location worldwide and may do so by virtual medicine; however, you cannot submit billings to Manitoba Health for care provided to patients located outside of Manitoba.

CPSM Members Practicing Virtual Medicine in Another Province

When practicing virtual medicine to patients located in another province, Manitoba physicians must be aware of and comply with the licensing requirements in the Canadian jurisdiction in which the patient is located. As is the case with Manitoba, many Canadian provinces require physicians to hold a license and have liability insurance to treat a patient located in that jurisdiction.

CPSM registered physicians can practice medicine and treat patients virtually in Nunavut without obtaining a license to practice medicine in Nunavut. This is under an agreement made with the Government of Nunavut. There is an agreement between Ontario and Manitoba for Manitoba to provide acute medical care to NW Ontario residents including follow-up. In addition to acute care, CancerCare Manitoba offers care to NW Ontario residents.

The position of the College of Physicians and Surgeons of Ontario as set out in its website, based upon Ontario legislation, is the following:

Licensing Requirements when Providing Virtual Care to Ontario Patients

Physicians providing virtual care to Ontario patients located in Ontario **must** hold a valid and active certificate of registration with the CPSO, unless the provision of virtual care from a physician licensed elsewhere is in the patient's best interest; for example, the care sought is:

- not readily available in Ontario (e.g., specialty care);
- provided within an existing physician-patient relationship and intended to bridge a gap in care; or
- for urgent or emergency assessment or treatment of a patient.

Manitoba Health Tariff

CPSM is advised by Doctors Manitoba that the Manitoba Health [tariff for virtual care](#) may be claimed by physicians only when the patient is physically located in Manitoba. During the pandemic, this has been extended to patients located in Saskatchewan, NW Ontario, and Nunavut.

View [Doctors Manitoba Advice on Virtual Care Across Borders](#), which brings together licensing, insurance, and billing considerations. See their [Virtual Care Resource Centre](#), for guides, articles, and billing advice.

CPSM is advised that certain drugs may only be covered by Manitoba Health if prescribed by certain practitioners in Manitoba or elsewhere (for instance, some drugs can only be covered if prescribed by physicians affiliated with the MS Clinic or CancerCare).

CPSM Members Practicing Virtual Medicine in the USA or Another Country

If the Standard of Practice can be met, CPSM will permit Manitoba registrants to treat Manitoba patients who are temporarily located outside of Canada if required for patient safety – such as follow-up of tests results or other urgent information. There is to be no ongoing care and treatment.

However, many jurisdictions consider the care to occur where the patient is physically located, and registrants will need to be aware of and comply with the licensing requirements of the jurisdiction where the patient is receiving virtual care. There may be specific rules regarding liability protection and billing in these circumstances, so registrants may wish to check with CMPA or Doctors Manitoba.

CPSM Registrants Temporarily Away from Manitoba Treating Manitoba Patients

Can there be virtual care in this scenario? It depends on the jurisdiction. Licensing requirements vary between jurisdictions. Providing virtual care that supports continuity of care, patient safety, or the patient's best interest to existing patients while the CPSM registrant is temporarily outside of Manitoba is permissible from CPSM's perspective – if this is allowed by the jurisdiction where the physician is located at the time AND the expectations in the CPSM Standard of Practice can be met.

There may be specific rules regarding liability protection and billing in these circumstances, so registrants may wish to check with CMPA or Doctors Manitoba.

Physicians Not Registered with CPSM – Virtual Medicine Not Permitted

The following are examples of situations where care using virtual medicine is Not Permitted under Manitoba Legislation by physicians who are not registered in Manitoba and where the patient is located in Manitoba:

- Medical care provided under a commercial telemedicine business venture
- Medical care provided as part of an employee benefits plan
- Independent psychiatric examination
- Medical care provided for employees of a company while working in Manitoba, including an assessment of fitness to work
- Patient has moved to Manitoba but has not yet arranged for a Manitoba family physician
- Patient travels to another province and pays for a non-insured treatment and requires pre- and post-treatment medical care
- Patient is visiting Manitoba
- Pre-assessment and post-medical treatment for uninsured medical services at the Mayo Clinic or other such medical facility
- Pre-assessment and post-medical treatment for patients at a residential treatment facility for eating disorders or addictions (unless done in conjunction with CPSM registered physician)
- Any ongoing active practice that is to be conducted by solely virtual medicine without a regular physician presence in Manitoba

Physicians Not Registered with CPSM – Virtual Medicine is Permitted

Examples of virtual medicine permitted by Physicians Registered in Other Provinces to a patient located in Manitoba:

- A specialist consultant providing care to a Manitoba patient residing in Manitoba if the general care of that condition is managed and coordinated through a specialist physician in Manitoba. Examples of these are:
 - Pediatric cardiac surgeon in Edmonton's Stollery Children's Hospital providing pre- and post-medical care along with a pediatric cardiologist at the HSC Children's Hospital
 - Transplant surgeon in Toronto providing pre- and post-transplant medical care along with the transplant team at HSC
 - Oncologist in Montreal providing medical treatment through CancerCare Manitoba.
 - Physician providing continuity of care for a patient for whom Manitoba Health has approved out-of-province health care as an insured benefit and approves reimbursement of travel for such care
 - Dermatologist that treats all patients across provinces for a rare skin condition
- Providing medical care as part of the Canadian Armed Forces on bases
- Providing care to inmates in federal correctional facilities which are beyond provincial jurisdiction
- Other federal undertakings
- Providing very brief continuity of care when a patient moves from one province to Manitoba; however, you cannot submit billings to Manitoba Health for care provided to patients located outside of Manitoba.