

Appendix A: Evaluation Guidelines

Compliance Indicators	Description	Supporting References
Business Associate Agreement (BAA)	Does the platform offers a BAA to covered entities?	45 CFR § 164.308(b)(1); § 164.502(e)(1); NIST SP 800-66 Rev 2 (App D – Administrative Safeguards)
HIPAA / HITECH Privacy Policy References	Does the platform specifically HIPAA, HITECH, or "covered entity/business associate" language to signal compliance?	45 CFR § 164.520 (Notice of Privacy Practices); 45 CFR § 164.304 (Security Rule definitions); NIST SP 800-66 Rev 2 (App D)
Retention Policy	Does the polataform indicate that they have a retention policy? (retained ≥ 6 years)	45 CFR § 164.316(b)(2)(i); NIST SP 800-53 Rev 5 (AU-11 Audit Record Retention)
Meeting History and Audit Logs	Does the platform mention the capability to track PHI access and generate audit reports?	45 CFR § 164.528; NIST SP 800-53 Rev 5 (AU-2, AU-6 Audit Logging and Review)
Breach Management Procedures	Does the platform have an incident response and breach management procedure in case of a cyber breach?	45 CFR § 164.308(a)(6)(ii); HITECH Act § 13402(a); NIST SP 800-66 Rev 2 (App D – Security Incident Procedures)
Consent and Authorization Workflow	Does the platform have an integrated digitized consent and authorization workflow?	45 CFR § 164.508 (Uses and Disclosures Requiring Authorization); NIST SP 800-53 Rev 5 (AP-1 Consent Mechanisms)
Complaint or Grievance Procedure Disclosure / Contact	Does the platform inform users how to file privacy or HIPAA complaints?	45 CFR § 164.530(d); HHS OCR Enforcement Procedures
Subcontractor / Subprocessor Compliance	Does the platform disclose its subprocessors and confirm all subcontractors have HIPAA-compliant agreements?	45 CFR § 164.502(e)(1)(vi); NIST SP 800-66 Rev 2 (App D – Business Associate Arrangements)
Privacy and Cyber Security Training and Awareness	Does the platform state that staff receive HIPAA privacy and cyber security training?	45 CFR § 164.530(b)(1); NIST SP 800-53 Rev 5 (AT-2 Security and Privacy Training)
Data Use and De-Identification Policy	Does the platform specify how data is anonymized or de-identified for analytics?	45 CFR § 164.514(a)–(b); NIST SP 800-53 Rev 5 (PT-3 Minimization of PHI Used in Testing and Training)
Risk Assessment	Does the platform mention conducting annual HIPAA risk assessments?	45 CFR § 164.308(b)(1); § 164.502(e)(1); NIST SP 800-66 Rev 2 (App D – Administrative Safeguards)
Cyber Security Indicators	Description	Supporting References
Role Based Access	Does the platform delineate permissions and administrative access across patients, staff, clinicians, and assistants?	45 CFR §164.308(a)(4); NIST SP 800-53 Rev 5 (AC-2 Account Management, AC-6 Least Privilege); ISO 27001 A.9.2.3 (User Access Provisioning)
Multi Factor Authentication (MFA)	Does the platform support multi-factor authentication? (tokens, authenticator app, sms, etc.)	45 CFR §164.312(d) (Person or Entity Authentication); NIST SP 800-53 Rev 5 (IA-2 Identification and Authentication); ISO 27001 A.9.4.2 (Secure Log-on Procedures)
Automatic Logout and Idle Timeout	Does the platform support session timeout after inactivity?	45 CFR §164.312(a)(2)(iii); NIST SP 800-53 Rev 5 (AC-11 Session Lock / Termination); ISO 27001 A.9.4.3 (Password Management System)
Encryption-in-Transit	Does the platform uses strong encryption for video sessions? (e.g. TLS 1.2).	45 CFR §164.312(e)(1); NIST SP 800-53 Rev 5 (SC-8 Transmission Confidentiality & Integrity, SC-13 Cryptographic Protection); ISO 27001 A.10.1.1 (Policy on Use of Cryptographic Controls)
Encryption-at-Rest	Does the platform use strong storage encryption methods? (AES-256 or similar).	45 CFR §164.312(a)(2)(iv); NIST SP 800-53 Rev 5 (SC-28 Protection of Information at Rest); ISO 27001 A.10.1.2 (Key Management)
Data Integrity Controls	Does the platform support hashing or checksum validation to prevent unauthorized modification?	45 CFR §164.312(c)(1); NIST SP 800-53 Rev 5 (SI-7 Software, Firmware, and Information Integrity); ISO 27001 A.14.2.8 (System Security Testing)
Third Party Security Attestation and Testing	Does the platform have independent third party security testing and attestation for the product? (e.g. PenTest, SOC2 Type 2, ISO 27001)	45 CFR §164.308(b)(1); NIST SP 800-53 Rev 5 (CA-2 Security Assessments, CA-8 Penetration Testing); ISO 27001 A.15.2.1 (Monitoring of Suppliers)
Incident Response Procedures	Does the platform have an incident response and breach management procedure in case of a cyber breach?	45 CFR §164.308(a)(6)–(8); NIST SP 800-53 Rev 5 (IR-4 Incident Handling, IR-6 Incident Reporting); ISO 27001 A.16.1 (Information Security Incident Management)
Backup and Disaster Recovery Controls	Does the platform have backup and recovery procedures to ensure that session data is recoverable?	45 CFR §164.308(a)(7)(ii)(A–C); NIST SP 800-53 Rev 5 (CP-9 Information System Backup, CP-10 System Recovery); ISO 27001 A.12.3 (Backup)
Network Security Controls	Does the platform have internal/external network monitoring and intrusion detection systems?	45 CFR §164.312(c)(1); NIST SP 800-53 Rev 5 (SC-7 Boundary Protection, SI-4 System Monitoring); ISO 27001 A.13.1 (Network Security Management)
Security Policy and Security Contact Availability	Does the platform have their version controlled security policies and contacts made available publicly?	45 CFR §164.308(a)(1)(ii)(A–B); NIST SP 800-53 Rev 5 (SI-2 Flaw Remediation); ISO 27001 A.12.6.1 (Management of Technical Vulnerabilities)
Patch Management Procedures	Does the platform have patch management procedures to ensure that vulnerabilities are remediated in their product?	45 CFR §164.308(a)(1)(ii)(A–B); NIST SP 800-53 Rev 5 (SI-2 Flaw Remediation); ISO 27001 A.12.6.1 (Management of Technical Vulnerabilities)
Cyber Insurance Policy	Does the platform have a cyber insurance policy?	
Workflow / Administrative Indicators	Description	Supporting References
Scheduling and Automated Reminders	Does the platform have built-in scheduling tools and automated reminders available for patient and practitioner?	APTA Telehealth Certificate Series – Technical Considerations (2021); APTA Telehealth Platform Matrix (2021); RE-AIM Framework – “Implementation & Maintenance Domains” (Glasgow et al., 2019)
Integration with EMR Software	Does the platform have direct integration with EMR/EHR systems for documentation and record keeping?	APTA Telehealth Certificate Series – Technical Considerations (2021); MAST Framework – “Technical Functionality and Integration with Health Infrastructure” (Kidd et al., 2010)
Client Billing / Insurance Verification	Does the platform support insurance eligibility checks, payer verification and POS code configuration?	APTA Telehealth Certificate Series – Coding, Billing & Documentation (2021); APTA Payment and Policy Resource Center (2022)
Secure Messaging / Chat Functionality	Does the platform support secure and HIPAA-compliant chat / messaging during sessions?	APTA Telehealth Certificate Series – Technical Considerations (2021); MAST Framework – “Patient Safety and Data Exchange Dimension” (2010)
Uptime and Availability SLAs	Does the platform clearly state their uptime and availability Service Level Agreements (SLA)?	APTA Telehealth Certificate Series – Technical Considerations (2021); MAST Framework – “Organizational Aspects – Reliability and Continuity of Service”
Training Resources (Staff & Patient)	Does the platform provide clinicians and patients tutorials in using the system?	APTA Telehealth Certificate Series – Administrative Course (2021); APTA Telehealth Practice Resources (2022); AMA STEPS Forward – “Telehealth Implementation Checklist” (2020)
Licensure and Jurisdiction Verification	Does the platform have integrated verification of provider licensure and patient / clinician physical location before each session?	FSBPT Telehealth in Physical Therapy: Policy Guidelines (2021); FSBPT Model Practice Act for Physical Therapy §3.01 (Licensure Requirement, 2020); APTA Telehealth Certificate Series – Administrative Course (2021)
IT and Helpdesk Support	Does the platform have 24/7 helpdesk support?	APTA Telehealth Certificate Series – Administrative Course (2021); MAST Framework – “Organizational Readiness and Technical Support Dimension”
Multi-device Access	Does the platform run on different devices? (e.g. Windows, Mac, Android, iOS)	APTA Telehealth Certificate Series – Technical Considerations (2021); MAST Framework – “Technical Feasibility and Accessibility Dimension”
Delegated Access	Does the platform support scheduling and management by support staff?	APTA Telehealth Certificate Series – Administrative Course (2021); FSBPT Telehealth in Physical Therapy – Supervision Guidance (2021)
Patient Queuing	Does the platform support patient queuing?	
Documentation Capability	Does the platform have built-in documentation capabilities	
Clinical Fit Indicators	Description	Supporting References
HD Quality Video	Does the platform support HD video (at least ≥1080p)?	APTA Telehealth Certificate Series – Technical Considerations (2021); APTA Telehealth Platform Matrix (2021)
Latency and Bandwidth Monitoring	Does the platform monitor for latency and bandwidth for real-time interaction quality? (Average latency < 300 ms)	APTA Telehealth Certificate Series – Technical Considerations (2021); MAST Framework – “Organizational and Technical Aspects”
Multi-camera / Multiple View	Does the platform support multiple video feeds and angles? (e.g., side and front views)	APTA Telehealth Certificate Series – Clinical Applications (2021); RE-AIM Framework – “Implementation Domain” (Glasgow et al., 2019)
Remote Therapeutic Monitoring	Does the platform interface with wearables or sensors for asynchronous data capture?	APTA Telehealth Certificate Series – Technical Considerations (2021); MAST Framework – “Patient Perspective and Effectiveness Dimension”
Session Recordings	Does the platform support full HD recording and storing of the session for future review of the practitioner?	FSBPT Model Practice Act for Physical Therapy §4.04 (2020); FSBPT Telehealth in Physical Therapy – Documentation & Confidentiality Guidance (2021)
Home Exercise Program (HEP) Library	Does the platform include video libraries for exercise demonstration and progress tracking?	APTA Telehealth Certificate Series – Technical Considerations (2021); RE-AIM Framework – “Maintenance Domain” (2019)
Video and Annotation Tools	Does the platform hae screen annotation / drawing tools to guide patient form and movement?	APTA Telehealth Certificate Series – Technical Considerations (2021); MAST Framework – “Effectiveness and Technical Feasibility Dimensions”
Outcome Dashboard / PROMs Integration	Does the platform proide outcome tracking and satisfaction surveys to assess quality and effectiveness?	APTA Telehealth Certificate Series – Technical Considerations (2021); RE-AIM Framework – “Effectiveness and Maintenance Domains” (Glasgow et al., 2019)
Multi-Session Support	Does the platform allow for multi-session support? (e.g. with caregiver, other PT / PTA practitioners)	APTA Telehealth Certificate Series – Administrative Course (2021); AMA STEPS Forward – Telehealth Implementation Playbook (2020)
Safety and Symptom Tracking	Does the platform provide a clear protocol to for safety and symptom oriented monitoring?	FSBPT Telehealth in Physical Therapy – Policy Guidelines §IV (Emergency Procedures, 2021); FSBPT Model Practice Act §4.04 (2020)
Accessibility and Inclusive Design	Does the platform provide accessibility features? (e.g. captions, large text, multi-lingual support)	APTA Telehealth Certificate Series – Technical Considerations (2021); MAST Framework – “Socioeconomic and Ethical Aspects”
Exercise Adherence Tracking / Check-Ins	Does the platform incorpote "check-in" or reminder features to support patient adherence?	APTA Telehealth Certificate Series – Technical Considerations (2021); RE-AIM Framework – “Implementation and Maintenance Domains” (Glasgow et al., 2019)