

ConnectingGTA Solution (Novation)

Privacy Impact Assessment Summary

Introduction

A privacy impact assessment was completed to assess the novation of the connectingGreaterTorontoArea (cGTA) solution from the University Health Network (UHN) to eHealth Ontario. Novation was completed in December 2014 resulting in eHealth Ontario assuming operating responsibility for the connectingGTA solution.

The privacy impact assessment was completed as required under Ontario Regulation 329/04 under the *Personal Health Information Protection Act, 2004* and by *eHealth Ontario's Personal Health Information Privacy Policy*.

The following is a summary of the privacy impact assessment, including a brief background on the initiative and key findings.

Background

ConnectingGTA, is delivering a regional electronic health record system to central Ontario's approximately 6.75 million citizens (50 per cent of the province's population). It is one of three hubs responsible for enabling effective delivery of provincial ehealth solutions.

The connectingGTA program will make it easier for patients and their caregivers to move through the continuum of care in the Greater Toronto Area. This seamless and secure system provides access to a majority of acute and community care data to improve the timeliness of care decisions, reduce duplicate tests and procedures and better support care transition points. The program is currently implementing with early adopters. This will pave the way for expansion across central Ontario and help drive future health system improvements and innovation.

Summary of Privacy Impact Assessment

This privacy impact assessment identifies privacy requirements, risks, and recommendations for the connectingGTA solution novation. This permits eHealth Ontario to build a privacy compliant solution using risk management principles. It allows eHealth Ontario to identify opportunities to promote privacy rights of Ontarians' through the design and operation of the connectingGTA solution and for enhancing those rights.

The connectingGTA solution electronically links and integrates patient information from across the care continuum and makes it available at the point-of-care to support the provision of health care and improve both patient and clinician experiences. ConnectionGTA is comprised of a back-end solution that allows health information custodians to transmit and store personal health information and the front-end solution, which allows health information custodians to view personal health information in a Clinical Data Repository and enables viewing of data in provincial databases such as the Ontario Laboratories Information System.

Novation of the connectingGTA solution to eHealth Ontario will result in eHealth Ontario assuming operating responsibility for the connectingGTA solution. The roles and responsibilities for the solution will change, however, the front-end and back-end technology as well as the technology behind contributing data to the Clinical Data Repository will not be affected.

The assessment makes recommendations to ensure that the data received and utilized by eHealth Ontario for the purposes of maintaining and operating ConnectingGTA complies with Ontario Regulation 329/04, section 6.2 as well as eHealth Ontario policies, procedures and privacy best practices.

Summary of Recommendations

1. eHealth Ontario to enter into an agreement with UHN to enable eHealth Ontario to use UHN's client registry to ensure data accuracy in the Clinical Data Repository.
2. eHealth Ontario and UHN to enter into a service provider agreement to document roles and responsibilities.
3. eHealth Ontario to develop an operations manual to support compliance with applicable policies.
4. eHealth Ontario to amend agreements with the Ontario Ministry of Health and Long-Term Care to reflect its new role in disclosing personal health information.
5. eHealth Ontario and UHN to finalize a consent directive application protocol to ensure timely management of patient consent directives.
6. eHealth Ontario to work with stakeholders to approve a data retention policy.
7. eHealth Ontario and UHN to finalize a protocol to ensure the timely processing of requests for access logs.

eHealth Ontario has implemented all of the above noted recommendations.

Contact Information

Please contact the eHealth Ontario Privacy Office should you have any questions about this summary:

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