

# Ontario Laboratories Information System Connecting GTA Integration

Delta Privacy Impact Assessment Summary

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## Introduction

As required under Ontario Regulation (O.Reg.) 329/04 under the *Personal Health Information Protection Act, 2004* (PHIPA), and by eHealth Ontario's personal health information privacy policy, eHealth Ontario completed a delta privacy impact assessment (PIA) on the Ontario laboratories information system (OLIS) - Connecting GTA (cGTA) initiative in August 2012.

The OLIS PIA found that eHealth Ontario has the authority under section 6.2 of O.Reg. 329/04 to permit access to OLIS data by authorized users for this initiative. As eHealth Ontario is receiving personal health information (PHI) from the Ministry of Health and Long-Term Care (MOHLTC) for the purpose of creating or maintaining one or more electronic health records.

The following is a summary of the PIA, including a brief background on the OLIS-cGTA initiative, key findings, and eHealth Ontario's progress in implementing the recommendations identified in the PIA.

## Background

The OLIS-cGTA initiative is part of the OLIS go-to-market strategy and aligns with the broader eHealth Ontario Strategy for the electronic health record. eHealth Ontario and the ConnectingGTA project (cGTA) are collaborating to make laboratory information from OLIS available to authorized users of the patient Results Online (PRO) Viewer, a clinical application operated by University Health Network–Shared Information Management Services (UHN-SIMS). Authorized users of PRO include clinicians from a number of participating Toronto area hospitals including; UHN, Sunnybrook Hospital, Mount Sinai Hospital, St. Michael's Hospital and Trillium Health Centre.

PRO allows OLIS data to be displayed in a format that is consistent with the look and feel, which PRO users are familiar with, and in a format that is consistent with the way PRO users are accustomed to viewing clinical data.

Clinicians will only be able to search on patients who are registered for care within their hospital settings. The viewer will allow the clinicians to view, and where appropriate, print data from PRO for the purpose of providing or assisting in the provision of health care.

This project involves the use and disclosure of Ontarians' personal health information, and is therefore guided by the *Personal Health Information Protection Act, 2004*. PHIPA only allows for collection, use, and disclosure of personal health information (PHI) under particular conditions.

## Summary of Privacy Impact Assessment

The delta PIA report identifies privacy requirements, risks, and recommendations for the OLIS-cGTA initiative as a result of changes in governance, users, disclosure and safeguards. This direction supports eHealth Ontario in building a privacy compliant solution based on a risk management approach. It allows eHealth Ontario to identify opportunities as early as possible in order to preserve or enhance Ontarians' privacy rights through the design and operation of the OLIS-cGTA initiative.

The delta PIA concludes that eHealth Ontario has the overall PHIPA authority under section 6.2 of O. Reg 329/04 to make OLIS data available to clinicians at the participating cGTA hospitals for the purpose of

providing or assisting in the provision of health care. Additionally, both eHealth Ontario and UHN, each have a robust infrastructure with strong privacy and security safeguards suitable for the processing and sharing sensitive PHI. The delta PIA makes a number of recommendations for this initiative, to ensure that eHealth Ontario continues to act in compliance with its privacy obligations in respect of legislation, policy and best practice.

The PIA makes recommendations to ensure that the data received and utilized by eHealth for the purposes of maintaining and operating OLIS complies with Ontario Regulation 329/04, s6.2 as well as eHealth Ontario policies, procedures and privacy best practices.

## Summary of the Implementation Plan for the Delta Privacy Impact Assessment Recommendations

The delta PIA provides a number of recommendations associated with the OLIS initiative, as summarized below:

1. eHealth Ontario to execute agreements with UHN and participating health information custodians who will be accessing OLIS data as per eHealth Ontario privacy policy.
2. eHealth Ontario to require participating health information custodians to perform periodic audits to assess inappropriate access to OLIS data via the PRO application.
3. eHealth Ontario and UHN to develop a risk treatment plan prior to go-live to address applicable security risks.
4. eHealth Ontario to work with UHN and participating health information custodians to ensure that coordinated privacy incident management and individual access processes are fully established in advance of go-live.

At the time of writing this PIA summary, all recommendations noted above had been implemented.

## Glossary

cGTA	ConnectingGTA
MOHLTC	Ministry of Health and Long-Term Care
OLIS	Ontario laboratories information system
O.Reg.	Ontario Regulation
PHIPA	<i>Personal Health Information Protection Act, 2004</i>
PHI	Personal health information
PIA	Privacy impact assessment
PRO	Patient Results Online
UHN	University Health Network
SIMS	Shared Information Management Systems

## Contact Information

Please contact the eHealth Ontario privacy office should you have any questions about the OLIS ConnectingGTA Integration Delta PIA Summary:

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