

Ontario Laboratories Information System (OLIS) – Connecting Greater Toronto Area (cGTA)

Privacy Impact Assessment Summary

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 Privacy Impact Assessment (“PIA”) on the Ontario Laboratories Information System (“OLIS”) – Connecting Greater Toronto Area (“cGTA”) initiative.

The PIA identifies privacy requirements, risks, and recommendations for the OLIS-cGTA initiative. This allows eHealth Ontario to build a privacy compliant solution using risk management principles and to identify opportunities to promote privacy rights of Ontarians.

The following is a summary of the PIA, including a brief background on the OLIS-cGTA initiative, key findings, and 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 EHR. The cGTA Solution was built by the University Health Network (“UHN”) to electronically link and integrate patient information from across the care continuum and make it available at the point-of-care to support the provision of health care and improve both patient and clinician experiences. eHealth Ontario and UHN are collaborating to make lab information from OLIS available to authorized participating Health Information Custodians (“HICs”) as part of the patient record available through the cGTA Solution.

This initiative will make OLIS accessible to the early adopter sites through a limited production release and a full production release. Initially, access will be given to fifteen health care organizations, including both hospitals and Community Care Access Centres.

This initiative involves providing clinical access to Ontarians’ Personal Health Information (“PHI”), and is therefore guided by the PHIPA. PHIPA only allows for the collection, use, and disclosure of PHI for specific purposes.

Summary of Privacy Impact Assessment

The PIA concludes that eHealth Ontario has the PHIPA authority under section 6.2 of O.Reg. 329/04 to make OLIS data available to clinicians at the participating sites for the purpose of providing or assisting in the provision of health care. Additionally, both eHealth Ontario and UHN, have robust infrastructures with strong privacy and security safeguards suitable for the processing and sharing of PHI. The PIA makes recommendations to ensure that eHealth Ontario continues to act in compliance with its privacy obligations in respect of legislation, policy and best practices.

Summary of Recommendations

The recommendations are summarized below:

1. Ministry of Health and Long-Term Care to amend its agreement with eHealth Ontario to permit the disclosure of OLIS data for the purpose of the cGTA Solution.
2. eHealth Ontario and UHN to execute a service provider agreement detailing roles and responsibilities.
3. Participating sites to execute EHR access services schedules.
4. End users are to receive privacy training on the appropriate use of the cGTA Solution including the appropriate use of OLIS data.
5. Risks identified in UHN's logical Threat Risk Assessment to be tracked and monitored by eHealth Ontario Security.
6. Processes to be developed to document how UHN and eHealth Ontario will engage each other for the purpose of privacy breach management and to fulfill individual's PHIPA access requests in relation to OLIS data.

eHealth Ontario has implemented all of the above noted recommendations.

Glossary

EHR	Electronic Health Record
cGTA	Connecting Greater Toronto Area
HIC	Health Information Custodian
MOHLTC	Ministry of Health and Long Term Care
O.Reg.	Ontario Regulation
OLIS	Ontario Laboratories Information System
PHIPA	Personal Health Information Protection Act
PHI	Personal Health Information
PIA	Privacy Impact Assessment
TRA	Threat Risk Assessment

Contact Information

Please contact the eHealth Ontario privacy office should you have any questions about the OLIS-cGTA delta PIA Summary:

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