

Summary of EHR Privacy Policies and Impact Analysis

Background

This document is a summary of the EHR privacy policies and an assessment of the impact of the policies on Health Information Custodians (HICs) participating in the ConnectingOntario Program. The document also highlights activities that eHealth Ontario will provide to support system functionality or to assist in operations activities.

Contents

Each section includes a brief summary of the policy as well as an assessment of how it impacts the HICs. Each section also includes the supports that eHealth Ontario will provide during implementation and on an ongoing basis to assist the HICs in meeting the obligations. A more detailed description of the impact analysis appears in the table below:

Obligation	Potential Impact for HICs						Proposed Support to be Provided by eHealth Ontario for:		
	Implementation Activities (One time)	ConnectingOntario Program Team's Assessment of Operational Impact for HICs (Ongoing)			HIC's Assessment of Operational Impact			Implementation Support	Ongoing Support
		Summary	Process Change?	Change in CPO workload	Process Change?	Change in Workload	Area of Impact		
<i>Key obligations that the HIC must meet from the policy</i>	<i>eHealth Ontario's assessment of the effort required by the HIC to implement the policy obligation</i>	<i>eHealth Ontario's assessment of how the obligation will impact the HIC from an operational perspective</i>	<i>eHealth Ontario's assessment of whether the obligation requires a process change and whether it impacts the HIC's workload.</i>	<i>Space for the HIC to record its own assessment of how the policy impacts the HIC</i>			<i>Support that eHealth Ontario as its service provider will provide to assist the HIC during implementation</i>	<i>Support that eHealth Ontario as its service provider will provide on an ongoing basis to assist the HIC in meeting its obligations</i>	

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1 Access and Correction

Policy Summary

1.1 Access

If the HIC receives the access request from an individual, there are two possible scenarios:

1. Involves PHI contributed by the HIC that the HIC viewed for healthcare purposes, or logs to which the HIC has access – **Respond to it according to its own internal policies and procedures.**
2. Involves PHI contributed by another HIC or involves logs to which the HIC has no access – **Ask the individual to contact eHealth Ontario.**

If eHealth Ontario receives an access request from an individual, there are three possible scenarios:

1. Involves PHI from one HIC –eHealth Ontario will record the relevant information and **forward it to that HIC** to fulfill according to its own policies and procedures.
2. Involves logs (e.g., who has viewed my PHI) – eHealth Ontario will respond to the request.
3. Involves PHI from more than one HIC – eHealth Ontario will coordinate the response on behalf of all of the affected HICs by asking them whether to fulfill the response, performing the administrative functions (e.g., forwarding monies to the HICs), and providing the PHI to the individual.

If the HIC requests an extension or denies a request coordinated by eHealth Ontario, eHealth Ontario will notify the individual of the extension and ask him or her to contact the HIC directly.

Background:

- *eHealth Ontario coordinates the response involving multiple HICs so that the individual can have a single point of contact and does not have to deal with several HICs.*
- *The timelines prescribed in the procedures are to ensure that the request can be fulfilled within 30 days of receiving the request as per PHIPA.*

1.2 Correction

If a HIC receives a correction request from an individual, there are two possible scenarios:

1. Involves PHI contributed by the HIC – Respond to the correction request following its standard policies and procedures; any changes the HIC makes in its source system will be uploaded to the ConnectingOntario Solution as a correction (any exceptions to this can be addressed through support)
2. Involves PHI contributed by another HIC – Ask the individual to contact eHealth Ontario

If eHealth Ontario receives a correction request from an individual, eHealth Ontario will record all relevant information about the request and forward it to the HIC that contributed the PHI to address according to its internal policies and procedures. eHealth Ontario will only make a correction where the HIC is unable to make the correction directly.

The HIC will give notice to the individual of how the correction was made as soon as possible in accordance with the EHR Access and Correction Policy.

Upon granting the Request for Correction, the HIC shall, in accordance with section 55(10) of PHIPA:

- Give notice to the individual in respect of how the requested correction was made as soon as possible; and
- At the request of the individual, given written notice of the requested correction, to the extent reasonably possible, to the persons to whom the HIC disclosed the PHI as soon as possible, except if the correction cannot reasonably be expected to have an effect on the ongoing provision of health care or other benefits to the individual.

Notes:

- *The reasons for establishing timelines by which to make a correction request is to ensure that the PHI is corrected in a timely manner so that downstream HICs collecting the PHI have access to the most up-to-date information possible.*

Summary of Key Obligations & Potential Impacts to Health Information Custodians (HICs)

Obligation	Potential Impact for HICs							Proposed Support to be Provided by eHealth Ontario for:	
	Implementation Activities (One time)	ConnectingOntario Team's Assessment of Operational Impact for HICs (Ongoing)			HIC's Assessment of Operational Impact			Implementation Support	Ongoing Support
		Summary	Process Change?	Change in CPO workload	Process Change?	Change in Workload	Area of Impact		
Respond to an access request – for PHI in your custody (Only sites that contribute PHI)	<ul style="list-style-type: none"> Make people / teams in your site aware of the ConnectingOntario Solution and how/where to fulfill requests 	<ul style="list-style-type: none"> N/A 	No	No				<ul style="list-style-type: none"> Sample HIC Policy Manual 	Operational <ul style="list-style-type: none"> eHealth Ontario can generate a copy of PHI your organization contributed to the CDR upon request System Functionality <ul style="list-style-type: none"> N/A
Respond to an access request – for PHI in the custody of another HIC	<ul style="list-style-type: none"> Make people / teams in your site aware of the ConnectingOntario Solution and what to do with questions or requests involving it Print and distribute contact information for eHealth Ontario 	New Process: <ul style="list-style-type: none"> Provide patient with contact information for eHealth Ontario Additional Effort: <ul style="list-style-type: none"> 5 minutes / patient requesting access (same as current redirect process) 	Yes	Yes - Low				<ul style="list-style-type: none"> Sample HIC Policy Manual Contact information for eHealth Ontario 	Operational <ul style="list-style-type: none"> Patient can be referred to eHealth Ontario who will work with appropriate HIC to respond System Functionality <ul style="list-style-type: none"> N/A

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	Implementation Activities (One time)	ConnectingOntario Team's Assessment of Operational Impact for HICs (Ongoing)			HIC's Assessment of Operational Impact			Implementation Support	Ongoing Support
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Respond to an access request for logs	<ul style="list-style-type: none"> Make people / teams in your site aware of the ConnectingOntario Solution and what to do with questions or requests involving it 	New Process: <ul style="list-style-type: none"> Contact eHealth Ontario for a copy of logs Additional Effort: <ul style="list-style-type: none"> 15 minutes / patient requesting access (same as current access process) 	No	Yes - Low				<ul style="list-style-type: none"> Sample HIC Policy Manual Audit Report Request Form 	Operational <ul style="list-style-type: none"> eHealth Ontario can provide copy of logs System Functionality <ul style="list-style-type: none"> Access to logs and reports through Administrative Portal (in development)
Respond to an access request that eHealth Ontario is coordinating on behalf of the patient	<ul style="list-style-type: none"> Prepare a log to track access requests 	New Process: <ul style="list-style-type: none"> Communicate with eHealth Ontario HIC must log when it responds to a Request for Access received from eHealth Ontario New timelines: <ul style="list-style-type: none"> 21 days after receiving request from eHealth Ontario to grant request, apply exceptions, or request extension 	Yes	Yes - Less				<ul style="list-style-type: none"> Sample HIC Policy Manual (includes tracking log template) 	Operational <ul style="list-style-type: none"> eHealth Ontario will communicate with the individual and perform all administrative functions eHealth Ontario will provide any forms / documents that need to be completed and copies of the PHI when forwarding the request System Functionality <ul style="list-style-type: none"> N/A

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Respond to a correction request – for PHI in your custody (Only sites that contribute PHI)	<ul style="list-style-type: none"> N/A 	<ul style="list-style-type: none"> No impact – Changes in the source system will automatically be uploaded to the CDR In the event the patient would like to inform other HICs that may have accessed the patient's record, sites must notify eHealth Ontario the correction was made and request an audit report of who has accessed the patient's record. The site must then notify the other HICs who may have accessed the patient's record that a correction has been made. <p><i>If the change cannot be made in the HIC's source system, contact eHealth Ontario for support.</i></p>	Yes	Yes - Low				<ul style="list-style-type: none"> Sample HIC Policy Manual 	Operational <ul style="list-style-type: none"> At the request of the individual, and to a reasonable extent, the HIC will notify all persons or HICs that collected the PHI to inform them of the correction if requested by the patient and medically relevant eHealth Ontario can run audit reports to determine which HICs have accessed a patient's records. eHealth Ontario can provide contact information for these HICs. System Functionality <ul style="list-style-type: none"> Corrections made in source system are automatically uploaded to the CDR.

Obligation	Potential Impact for HICs						Proposed Support to be Provided by eHealth Ontario for:		
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		Summary	Process Change?	Change in CPO workload	Process Change?	Change in Workload	Area of Impact		
Respond to a correction request – for PHI in the custody of another HIC	<ul style="list-style-type: none"> Make people / teams in your site aware of the ConnectingOntario Solution and what to do with questions or requests involving it Print and distribute contact information for eHealth Ontario 	New Process: <ul style="list-style-type: none"> Provide patient with contact information for eHealth Ontario Additional Effort: <ul style="list-style-type: none"> 5 minutes / patient requesting access (same as current redirect process) 	Yes	Yes - Low				<ul style="list-style-type: none"> Sample HIC Policy Manual Contact information for eHealth Ontario 	Operational <ul style="list-style-type: none"> Patient can be referred to eHealth Ontario who will work with appropriate HIC to respond At the request of the individual, and to a reasonable extent, eHealth Ontario will help the appropriate HIC notify all HICs that collected the PHI to inform them of the correction. System Functionality <ul style="list-style-type: none"> N/A
Respond to a correction request that eHealth Ontario is coordinating on behalf of the patient (Only sites that contribute PHI)	<ul style="list-style-type: none"> Prepare a log to record Requests for Correction 	New Process: <ul style="list-style-type: none"> HIC receives request from eHealth Ontario HIC must log when it responds to a correction request forwarded by eHealth Ontario 	Yes	Yes - Less				<ul style="list-style-type: none"> Sample HIC Policy Manual (includes tracking log template) 	Operational <ul style="list-style-type: none"> eHealth Ontario will receive requests from patient, verify identity, and provide confirmed information to HIC. System Functionality <ul style="list-style-type: none"> Corrections made in source system are automatically uploaded to the CDR

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Notify HICs of a correction upon patient request	<ul style="list-style-type: none"> N/A 	<ul style="list-style-type: none"> HIC will respond to the correction request in accordance with existing practices <p>New Process:</p> <ul style="list-style-type: none"> HIC will contact eHealth Ontario to request an audit report of who has accessed the patient's record. The site must then notify the other HICs who may have accessed the patient's record that a correction has been made 	Yes	Yes - Less				<ul style="list-style-type: none"> N/A 	<p>Operational</p> <ul style="list-style-type: none"> eHealth Ontario can run audit reports to determine which HICs have accessed a patient's records. eHealth Ontario can provide contact information for these HICs. <p>System Functionality</p> <ul style="list-style-type: none"> N/A

2 Consent Management

Policy Summary

2.1 Obtaining Consent

- HICs follow their own policies and procedures for obtaining either implied or express consent.
- HICs include consent in their Privacy Notice or when they communicate with the patient about participation in electronic health networks.
- HICs provide patients with a brochure and/or direct them to eHealth Ontario's website or phone line available if they want more information.

2.2 Applying a Consent Directive

- Patients may apply one or more of the following levels of consent directives:
 - o Global: Prevents anyone viewing any part of the record (e.g., do not allow anyone to see my record).
 - o Domain: Prevents anyone viewing the patient's record in one or more repositories (e.g., do not allow anyone to see my record in Diagnostic Imaging).
 - o HIC-Records: Prevents anyone viewing the patient's record from a particular HIC (e.g., do not allow anyone to see my records contributed by City Hospital).
 - o HIC-Agent: Prevents anyone from a particular HIC viewing the patient's entire record (e.g., do not allow anyone at City Hospital to see my record).
 - o Agent: Prevents a particular individual from viewing the patient's entire record (e.g., do not allow Dr. Jon to see my record).

- If a HIC receives a request related to a consent directive, there are two possible scenarios:

1. **Involves PHI contributed by the HIC:** respond to the consent directive request according to existing practices. If the consent directive request is related to an agent, contact eHealth Ontario to identify and apply the consent directive against other accounts the agent may have.
2. **All other requests for a consent directive:** Direct the patient to fill out the eHealth Ontario Consent Directive Form, and fax or mail the form to eHealth Ontario. The HIC may send in the form to eHealth Ontario on the patient's behalf. eHealth Ontario will apply the consent directive, and will notify the HIC when the consent directive has been placed. The HIC can then notify the individual of the successful consent directive application.

*Note: at implementation, there may be no capability for HICs to apply a consent directive in the ConnectingOntario CDR. Therefore, **all requests for consent directives must be directed to eHealth Ontario to be applied in the system.** eHealth Ontario will confirm that the consent directive has been applied, and the HIC will notify the individual.*

2.3 Overriding a Consent Directive

There are three purposes for overriding a Consent Directive in the ConnectingOntario Solution:

1. With the express consent of the individual (or their substitute decision maker) to whom the PHI relates;
2. On reasonable grounds that the collection is necessary for the purpose of eliminating or reducing a significant risk of serious bodily harm to the individual to whom the PHI relates and it is not reasonably possible to obtain the consent of the individual in a timely manner; or
3. On reasonable grounds that the collection is necessary for the purpose of eliminating or reducing a significant risk of serious bodily harm to a person other than the individual to whom the PHI relates or to a group of persons.

If a consent directive is overridden, eHealth Ontario will notify the HIC who in turn must follow-up with the person that conducted the override, and provide notice of the override to the patient.

Summary of Key Obligations & Potential Impacts to HICs

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	Implementation Activities (One time)	eHealth Ontario's Assessment of Operational Impact for HICs (Ongoing)			HIC's Assessment of Operational Impact			Implementation Support	Ongoing Support
		Summary	Process Change?	Change in CPO workload	Process Change?	Change in Workload	Area of Impact		
Obtain consent	<ul style="list-style-type: none"> Review existing Privacy Notices to ensure alignment with EHR Consent Management Policy Re-print and/or re-post communications materials (e.g., posters) Print and distribute contact information for eHealth Ontario 	<p>New Process:</p> <ul style="list-style-type: none"> Update privacy notice if required Provide the patient with notice and contact information for eHealth Ontario when requesting more information <p>Additional effort:</p> <ul style="list-style-type: none"> Effort depends on internal process to approve changes in Privacy Notices 	Yes	Yes - Low				<ul style="list-style-type: none"> Contact information for eHealth Ontario ConnectingOntario Poster to use at sites Plain-language information about ConnectingOntario Program on eHealth Ontario website 	<p>Operational</p> <ul style="list-style-type: none"> eHealth Ontario maintains a website with public information about eHealth Ontario to which patients can be directed for more information (i.e. layered notice) eHealth Ontario privacy office maintains a toll-free number to receive patient calls <p>System Functionality</p> <ul style="list-style-type: none"> N/A

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	Implementation Activities (One time)	eHealth Ontario's Assessment of Operational Impact for HICs (Ongoing)			HIC's Assessment of Operational Impact			Implementation Support	Ongoing Support
		Summary	Process Change?	Change in CPO workload	Process Change?	Change in Workload	Area of Impact		
Respond to a Consent Directive Request – for PHI in your custody, against a HIC, or global	<ul style="list-style-type: none"> Prepare a log to record CDs or use one supplied by eHealth Ontario Prepare the template to notify patient when completed 	<p>New Process: If no HL7 Feed:</p> <ul style="list-style-type: none"> Create a CD in the Connecting Ontario CDR in addition to your HIS (or automatic upload from HIS if your HIS supports it) <p>Note: at implementation, this functionality may not be in place. The alternative process will be to forward all CD requests to eHealth Ontario.</p> <ul style="list-style-type: none"> Log the CD request Notify patient when CD is created modified, or removed (HIC will receive notice from eHealth Ontario if eHealth Ontario applied the CD), <p>If HL7 Feed:</p> <ul style="list-style-type: none"> Create the CD in local system <p>Additional effort:</p> <ul style="list-style-type: none"> 30 minutes to create and validate the CD, and mail notice to patient <p>New timelines:</p> <ul style="list-style-type: none"> 7 days to create, modify, or delete the consent directive from after validating the 	Yes	Yes - Low				<ul style="list-style-type: none"> Sample HIC Policy Manual Sample Log Sample Response Templates 	<p>Operational</p> <ul style="list-style-type: none"> eHealth Ontario creates the CD on behalf of the HIC, and notifies the HIC when complete (if no functionality exists) <p>System Functionality</p> <ul style="list-style-type: none"> HL7 feed

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		Summary	Process Change?	Change in CPO workload	Process Change?	Change in Workload	Area of Impact		
		<p>patient's identity</p> <p>Note: if functionality to place CD is unavailable, recommend forwarding the CD request to eHealth Ontario no later than 4 days after validating the patient's identity to ensure the CD is applied within the timeframe outlined in EHR Consent Management Policy</p> <ul style="list-style-type: none"> Immediately after creating CD, notify the patient that the CD was applied 							

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	Implementation Activities (One time)	eHealth Ontario's Assessment of Operational Impact for HICs (Ongoing)			HIC's Assessment of Operational Impact			Implementation Support	Ongoing Support
		Summary	Process Change?	Change in CPO workload	Process Change?	Change in Workload	Area of Impact		
Respond to a Consent Directive Request – against an Agent	<ul style="list-style-type: none"> Prepare a log to record CDs or use one supplied by eHealth Ontario Prepare the template to notify patient or use one supplied by eHealth Ontario 	<p>New Process:</p> <ul style="list-style-type: none"> Complete the CD form on behalf of the patient and send the form to eHealth Ontario to apply the CD. Log the CD request Notify patient when CD created, modified, or removed (HIC will receive notice from eHealth Ontario) <p>Additional effort:</p> <ul style="list-style-type: none"> 15 minutes to inform eHealth Ontario 30 minutes to create and mail notice to patient <p>New timelines:</p> <ul style="list-style-type: none"> 7 days to create, modify, or delete the consent directive and forward it to eHealth Ontario from after validating the patient's identity <p>Note: if functionality to place CD is unavailable, recommend forwarding the CD request to eHealth Ontario no later than 4 days after validating the patient's identity to ensure the CD is applied within the timeframe outlined in EHR Consent Management Policy</p>	Yes	Yes - Medium				<ul style="list-style-type: none"> Sample HIC Policy Manual (includes log and letter templates) 	<p>Operational</p> <ul style="list-style-type: none"> eHealth Ontario creates the CD on behalf of the HIC, and notifies the HIC when complete eHealth Ontario will identify other accounts of the agent, and apply the consent directive against the appropriate accounts Organizations may be contacted to confirm an agent's information if a potential match is found <p>System Functionality</p> <ul style="list-style-type: none"> N/A

Obligation	Potential Impact for HICs							Proposed Support to be Provided by eHealth Ontario for:	
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		Summary	Process Change?	Change in CPO workload	Process Change?	Change in Workload	Area of Impact		
		<ul style="list-style-type: none"> Immediately after creating CD, notify the patient that the CD was applied 							

Obligation	Potential Impact for HICs						Proposed Support to be Provided by eHealth Ontario for:		
	Implementation Activities (One time)	eHealth Ontario's Assessment of Operational Impact for HICs (Ongoing)			HIC's Assessment of Operational Impact			Implementation Support	Ongoing Support
		Summary	Process Change?	Change in CPO workload	Process Change?	Change in Workload	Area of Impact		
Respond to request for CD against another HIC's records	<ul style="list-style-type: none"> Print and distribute contact information for eHealth Ontario 	<p>New Process:</p> <ul style="list-style-type: none"> Provide the patient with contact information for eHealth Ontario to submit the CD request Log the CD request <p>Additional effort:</p> <ul style="list-style-type: none"> 5 minutes / patient requesting a consent directive (same as current redirect process) <p>New timelines:</p> <ul style="list-style-type: none"> As soon as possible, refer the patient to eHealth Ontario 	Yes	Yes - Low				<ul style="list-style-type: none"> Contact information for eHealth Ontario 	<p>Operational</p> <ul style="list-style-type: none"> Patient can be referred to eHealth Ontario who will work with appropriate HIC to respond <p>System Functionality</p> <ul style="list-style-type: none"> N/A

Obligation	Potential Impact for HICs							Proposed Support to be Provided by eHealth Ontario for:	
	Implementation Activities (One time)	eHealth Ontario's Assessment of Operational Impact for HICs (Ongoing)			HIC's Assessment of Operational Impact			Implementation Support	Ongoing Support
		Summary	Process Change?	Change in CPO workload	Process Change?	Change in Workload	Area of Impact		
Overriding a Consent Directive	<ul style="list-style-type: none"> N/A 	<p>New Process:</p> <ul style="list-style-type: none"> Review overrides when they occur to ensure they are appropriate Only use the PHI for the purpose for which it was collected; if printing the PHI, note that the PHI can only be used for the purpose for which the CD was overridden If obtaining express consent from a patient in the event of an override, must ensure the patient is appropriately informed <p>Additional effort:</p> <ul style="list-style-type: none"> 15 minutes to record in the HIS or the paper chart (if the PHI is inputted) 30 minutes / override to confirm appropriateness of the override 	Yes	Yes - Low				<ul style="list-style-type: none"> N/A 	<p>Operational</p> <ul style="list-style-type: none"> eHealth Ontario will alert the Privacy Contact of overrides and provide an audit report with relevant information <p>System Functionality</p> <ul style="list-style-type: none"> Warns that some PHI is blocked Instructs the user regarding limited use Pop-up requiring user to select purpose for override (express consent from the patient or SDM, reduce risk of bodily harm to patient, or reduce risk of bodily harm to others)
Notify the patient in the event of an override	<ul style="list-style-type: none"> Ensure a process is in place to follow-up with agent that conducted the override Prepare template or use one supplied by eHealth Ontario for notice 	<p>New Process:</p> <ul style="list-style-type: none"> Provide notice to patient when override performed Keep a record of the notice (either log or a copy of the notice) <p>Additional effort:</p> <ul style="list-style-type: none"> 15 minutes to create and mail notice to patient 	Yes	Yes - Low				<ul style="list-style-type: none"> Sample HIC Policy Manual (includes log and letter templates) 	<p>Operational</p> <ul style="list-style-type: none"> eHealth Ontario alerts the HIC when an override has been performed and a report is provided of the PHI that was overridden <p>System Functionality</p> <ul style="list-style-type: none"> N/A

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Provide notice to the IPC if the purpose for the CD override is to reduce harm to others	<ul style="list-style-type: none"> Prepare template or use one supplied by eHealth Ontario for notice 	<p>New Process:</p> <ul style="list-style-type: none"> Send notice to IPC if the CD was overridden for the purpose of reducing the risk of bodily harm to someone other than the patient <p>Additional effort:</p> <ul style="list-style-type: none"> 30 minutes / override to create and mail notice to IPC <p>New timelines:</p> <ul style="list-style-type: none"> 7 days to send notice to IPC 	Yes	Yes - Low				<ul style="list-style-type: none"> Sample HIC Policy Manual (includes log and letter templates) Letter template 	<p>Operational</p> <ul style="list-style-type: none"> eHealth Ontario will provide a report to HIC that it can use to support reporting to IPC eHealth Ontario alerts the HIC when an override occurs <p>System Functionality</p> <ul style="list-style-type: none"> N/A

3 Inquiries and Complaints

Policy Summary

Inquiries and Complaints

If HIC receives the inquiry or complaint:

- Respond if the inquiry relates to your HIC or if you can address the inquiry.
- If you cannot address the inquiry and if it is not related to your HIC, provide the person with eHealth Ontario contact information.
- Respond to the complaint if it is solely related to your HIC.
- Provide the person with eHealth Ontario contact information if it is not solely related to your HIC.

If eHealth Ontario receives the inquiry or complaint:

- eHealth Ontario will address the complaint or inquiry if it is about eHealth Ontario or the ConnectingOntario Solution.
- If it relates to a single HIC, eHealth Ontario may contact the appropriate HIC and forward the inquiry or complaint to that HIC.
- If it relates to multiple HICs, eHealth Ontario will facilitate communication with the HICs and draft a response.
- When eHealth Ontario is responsible for coordinating and the HIC does not respond, eHealth Ontario will tell the person that there was no response and ask them to contact the HIC directly or make a complaint to the Information and Privacy Commissioner of Ontario (IPC).

Any complaints that reveal a privacy breach will be handled according to the privacy breach policies and the complainant will be notified of the results of the breach investigation.

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		Summary	Process Change?	Change in CPO workload	Process Change?	Change in Workload	Area of Impact		
Respond to an inquiry or complaint related to your use of or participation in the ConnectingOntario Program	<ul style="list-style-type: none"> Ensure staff members who answer inquiries or complaints aware of ConnectingOntario 	<ul style="list-style-type: none"> No impact except timeline <p>New timelines:</p> <ul style="list-style-type: none"> 30 days after receiving inquiry or complaint to respond 	Yes	No				<ul style="list-style-type: none"> Sample HIC Policy Manual Plain-language information about ConnectingOntario on eHealth Ontario website 	<p>Operational</p> <ul style="list-style-type: none"> N/A <p>System Functionality</p> <ul style="list-style-type: none"> N/A
Respond to an inquiry or complaint related to eHealth Ontario or another HIC	<ul style="list-style-type: none"> Print and distribute contact information for eHealth Ontario 	<p>New Process:</p> <ul style="list-style-type: none"> Provide patient with contact information for eHealth Ontario <p>Additional effort:</p> <ul style="list-style-type: none"> 15 minutes/inquiry to address question if easily addressed by the HIC; <i>or</i> 5 minutes/inquiry or complaint to refer the patient to eHealth Ontario <p>New timelines:</p> <ul style="list-style-type: none"> 4 days after receiving inquiry or complaint to ask patient to contact eHealth Ontario 30 days after receiving inquiry to respond to the inquiry 	Yes	Yes - Low				<ul style="list-style-type: none"> Sample HIC Policy Manual Plain-language information about ConnectingOntario Program on eHealth Ontario website 	<p>Operational</p> <ul style="list-style-type: none"> Patient can be referred to eHealth Ontario who will coordinate a response eHealth Ontario will communicate with the individual and perform all administrative functions <p>System Functionality</p> <ul style="list-style-type: none"> N/A

Obligation	Potential Impact for HICs						Proposed Support to be Provided by eHealth Ontario for:		
	Implementation Activities (One time)	eHealth Ontario's Assessment of Operational Impact for HICs (Ongoing)			HIC's Assessment of Operational Impact			Implementation Support	Ongoing Support
		Summary	Process Change?	Change in CPO workload	Process Change?	Change in Workload	Area of Impact		
Respond to an inquiry or complaint forwarded to you by eHealth Ontario and which involves only you	<ul style="list-style-type: none"> N/A 	<ul style="list-style-type: none"> No impact except timeline <p>New timelines:</p> <ul style="list-style-type: none"> 30 days to respond after eHealth Ontario received the inquiry or complaint 	Yes	No				<ul style="list-style-type: none"> N/A 	<p>Operational</p> <ul style="list-style-type: none"> eHealth Ontario will provide sites with necessary forms and instructions when making a request eHealth Ontario can provide audit reports as requested to respond to complaints <p>System Functionality</p> <ul style="list-style-type: none"> N/A

Obligation	Potential Impact for HICs							Proposed Support to be Provided by eHealth Ontario for:	
	Implementation Activities (One time)	eHealth Ontario's Assessment of Operational Impact for HICs (Ongoing)			HIC's Assessment of Operational Impact			Implementation Support	Ongoing Support
		Summary	Process Change?	Change in CPO workload	Process Change?	Change in Workload	Area of Impact		
Respond to an inquiry or complaint that eHealth Ontario is coordinating on behalf of a patient	<ul style="list-style-type: none"> N/A 	<p>New Process:</p> <ul style="list-style-type: none"> HIC deals with eHealth Ontario directly instead of with patient <p>New timelines:</p> <ul style="list-style-type: none"> 14 days to provide eHealth Ontario with initial information to support eHealth Ontario drafting a response 4 days to review eHealth Ontario's response 	Yes	Yes - Less				<ul style="list-style-type: none"> N/A 	<p>Operational</p> <ul style="list-style-type: none"> eHealth Ontario will communicate with the individual and perform all administrative functions eHealth Ontario will draft the response so that HICs only have to review and approve. <p>System Functionality</p> <ul style="list-style-type: none"> Provides a report on who has viewed PHI if the complaint is related to an inappropriate access

4 Privacy Breach Management

Policy Summary

- All breaches involving the ConnectingOntario Solution must be reported at the first reasonable opportunity, but no later than by end of the next business day after the HIC has become aware of the breach
- There are 4 possible scenarios when a breach is identified:
 1. HIC causes a breach that involves PHI solely created and contributed by the HIC responsible for the breach – Follow internal policies and procedures to respond, but must provide eHealth Ontario with a summary of the results of the investigation when concluded
 2. HIC causes a breach that involves PHI contributed by another or multiple HICs - HIC should notify eHealth Ontario of the breach at the first reasonable opportunity, but not later than by the end of the next business day
 3. Multiple HICs cause a breach
 4. eHealth Ontario causes a breach, or the breach is caused by an unauthorized person who is not an Agent of eHealth Ontario or a HIC:

For all scenarios:

- o All impacted HICs will be notified of the breach.
- o eHealth Ontario will choose a breach investigator and the appropriate HIC to notify the individuals affected by the breach as required.
- o The HIC(s) responsible for the breach uses its discretion regarding whether to notify IPC, other regulatory bodies, or law enforcement of the breach.
- o The breach investigator will complete the breach report; impacted HICs will be able to comment on it.
- o eHealth Ontario will provide the breach report to the appropriate oversight committee for review and approval of remediation activities.

Notes:

- *The policy allows eHealth Ontario to work together with the impacted HICs to determine who should notify the impacted patients and who should investigate the breach. This is to accommodate situations in which the party responsible for the breach may not have the capacity or relationship to affected individuals to notify or investigate.*
- *A HIC needs to report any breaches related to the ConnectingOntario Solution (even if it only impacts that HIC) so that eHealth Ontario can confirm that it does not impact any other HICs and can identify trends that a system or operational change could help mitigate.*

Summary of Key Obligations & Potential Impacts to HICs

Obligation	Potential Impact for HICs							Proposed Support to be Provided by eHealth Ontario for:	
	Implementation Activities (One time)	eHealth Ontario's Assessment of Operational Impact for HICs (Ongoing)			HIC's Assessment of Operational Impact			Implementation Support	Ongoing Support
		Summary	Process Change?	Change in CPO workload	Process Change?	Change in Workload	Area of Impact		
Reporting Breaches	<ul style="list-style-type: none"> Inform help desk, privacy contact, and any other User of requirement to report real or suspected breaches involving ConnectingOntario Print and distribute contact information for eHealth Ontario 	<p>New Process:</p> <ul style="list-style-type: none"> Privacy contact or help desk reports breach to eHealth Ontario Provide summary of investigation results if breach only impacts PHI contributed by site <p>Additional effort:</p> <ul style="list-style-type: none"> 30 minutes to report the breach to eHealth Ontario 30 minutes to provide summary results <p>New timelines:</p> <ul style="list-style-type: none"> Report by end of next business after becoming aware of breach 	Yes	Yes - Low				<ul style="list-style-type: none"> Sample HIC Policy Manual 	<p>Operational</p> <ul style="list-style-type: none"> eHealth Ontario will guide site on information it requires at time of reporting. <p>System Functionality</p> <ul style="list-style-type: none"> N/A
Contain breach – if relevant	<ul style="list-style-type: none"> N/A 	<p>New Process:</p> <ul style="list-style-type: none"> Discuss breach containment with eHealth Ontario <p>Additional effort:</p> <ul style="list-style-type: none"> Estimated 60 minutes to discuss containment with eHealth Ontario Containment effort depends on issue 	No	Yes - Low to High				<ul style="list-style-type: none"> N/A 	<p>Operational</p> <ul style="list-style-type: none"> eHealth Ontario will provide support to the HIC responsible for containment to ensure that it is effective. <p>System Functionality</p> <ul style="list-style-type: none"> N/A

Obligation	Potential Impact for HICs							Proposed Support to be Provided by eHealth Ontario for:	
	Implementation Activities (One time)	eHealth Ontario's Assessment of Operational Impact for HICs (Ongoing)			HIC's Assessment of Operational Impact			Implementation Support	Ongoing Support
		Summary	Process Change?	Change in CPO workload	Process Change?	Change in Workload	Area of Impact		
Investigate Breach – if caused by HIC that solely created and contributed PHI	<ul style="list-style-type: none"> Follow existing breach management processes to investigate and contain breach Notify impacted individuals as well as eHealth Ontario with summary of breach investigation results 	New Process: <ul style="list-style-type: none"> Notify eHealth Ontario with summary of breach investigation results 	Yes	Yes- Low				<ul style="list-style-type: none"> N/A 	

Obligation	Potential Impact for HICs						Proposed Support to be Provided by eHealth Ontario for:		
	Implementation Activities (One time)	eHealth Ontario's Assessment of Operational Impact for HICs (Ongoing)			HIC's Assessment of Operational Impact			Implementation Support	Ongoing Support
		Summary	Process Change?	Change in CPO workload	Process Change?	Change in Workload	Area of Impact		
Investigate Breach – if chosen by impacted HICs	<ul style="list-style-type: none"> N/A 	<p>New Process if chosen as the investigator:</p> <ul style="list-style-type: none"> Develop investigation plan (no documentation required) Provide status updates to eHealth Ontario Edit report based on comments from impacted HICs <p>Additional effort:</p> <ul style="list-style-type: none"> 2 hours to draft plan and discuss with eHealth Ontario 30 minutes / status update to eHealth Ontario Up to 4 hours to draft and edit report <p>New timelines:</p> <ul style="list-style-type: none"> 7 days to begin investigation 7 days after completing investigation to draft report 7 days after receiving comments to respond to impacted HICs 	Yes	Yes - Medium (if chosen)				<ul style="list-style-type: none"> Sample Privacy Breach Report Template 	<p>Operational</p> <ul style="list-style-type: none"> eHealth Ontario will coordinate among impacted HICs to choose an appropriate breach investigator, including taking on the role of breach investigator as requested by impacted HICs. eHealth Ontario will provide support to developing the investigation plan. eHealth Ontario will distribute status updates from the breach investigator to the impacted HICs. <p>System Functionality</p> <ul style="list-style-type: none"> N/A

Obligation	Potential Impact for HICs							Proposed Support to be Provided by eHealth Ontario for:	
	Implementation Activities (One time)	eHealth Ontario's Assessment of Operational Impact for HICs (Ongoing)			HIC's Assessment of Operational Impact			Implementation Support	Ongoing Support
		Summary	Process Change?	Change in CPO workload	Process Change?	Change in Workload	Area of Impact		
Notify affected Patients – if chosen by impacted HICs	<ul style="list-style-type: none"> Prepare template or use one supplied by eHealth Ontario 	New Process: <ul style="list-style-type: none"> Need to coordinate amongst HICs to determine most appropriate HIC to notify A HIC may be required to notify the patient even if it was not responsible HIC needs to provide update on the investigation results to eHealth Ontario Additional effort: <ul style="list-style-type: none"> Unknown 	Yes	Yes - Low to High				<ul style="list-style-type: none"> Sample HIC Policy Manual (includes letter template) 	Operational <ul style="list-style-type: none"> eHealth Ontario will facilitate among impacted HICs to choose the appropriate HIC to notify patients. System Functionality <ul style="list-style-type: none"> N/A
Review Breach Report – if impacted by breach (optional)	<ul style="list-style-type: none"> N/A 	New Process: <ul style="list-style-type: none"> Review and comment on breach report (optional) Additional effort: <ul style="list-style-type: none"> 30 minutes to review breach report New timelines: <ul style="list-style-type: none"> 7 days to comment on breach report after receiving it 	Yes	Yes - Low				<ul style="list-style-type: none"> N/A 	Operational <ul style="list-style-type: none"> eHealth Ontario will distribute breach report amongst impacted HICs for comment System Functionality <ul style="list-style-type: none"> N/A

Obligation	Potential Impact for HICs							Proposed Support to be Provided by eHealth Ontario for:	
	Implementation Activities (One time)	eHealth Ontario's Assessment of Operational Impact for HICs (Ongoing)			HIC's Assessment of Operational Impact			Implementation Support	Ongoing Support
		Summary	Process Change?	Change in CPO workload	Process Change?	Change in Workload	Area of Impact		
Perform remedial activities – if requested by eHealth Ontario or applicable governance body	<ul style="list-style-type: none"> N/A 	New Process: <ul style="list-style-type: none"> Work with breach investigator to identify appropriate remedial activities Implement remedial activities approved by PSC or SC Additional effort: <ul style="list-style-type: none"> Unknown 	Yes	Yes – Low to High				<ul style="list-style-type: none"> N/A 	Operational <ul style="list-style-type: none"> eHealth Ontario will work with HICs to identify appropriate remedial activities based on recommendations from applicable governance body System Functionality <ul style="list-style-type: none"> N/A
Notify IPC (at the discretion of the HIC(s))	<ul style="list-style-type: none"> Prepare a template or use one provided by eHealth Ontario 	New process: <ul style="list-style-type: none"> Consult with impacted HICs and eHealth Ontario when preparing report to IPC Additional effort: <ul style="list-style-type: none"> Up to 4 hours to prepare breach report and consult with eHealth Ontario and other HICs 	Yes	Yes - Low (but at discretion of HIC)				<ul style="list-style-type: none"> Sample HIC Policy Manual (includes letter template) 	Operational <ul style="list-style-type: none"> eHealth Ontario will provide support to develop the breach report upon request. System Functionality <ul style="list-style-type: none"> N/A

5 Logging and Auditing

Policy Summary

The purpose of this policy is to define the policies, procedures and practices that apply in logging, auditing, and monitoring of all instances where all or part of the personal health information (PHI) in the ConnectingOntario Solution is viewed, handled or otherwise dealt with. This includes when PHI is transferred to another HIC, disclosed to and collected by a HIC as a result of an override of a consent directive, and when a consent directive is made, modified or withdrawn in the Solution.

The key roles outlined in the policy are: The Connecting Privacy Committee (CPC) and Connecting Security Committee (CSC) will:

- Develop the standards associated with logging and auditing.

HICs will review:

- When one of their users views PHI.
- When one of their users creates or overrides a consent directive.
- All other instances when PHI that the HIC contributed to the ConnectingOntario Solution is viewed to identify potentially suspicious activity.
- When other users override a consent directive blocking disclosure of PHI that the HIC contributed to the ConnectingOntario Solution.

eHealth Ontario will review:

- When their own users or those of their service providers (i.e., system administrators) view PHI in the ConnectingOntario Solution.
- When PHI is transferred among systems.
- When a HIC's users or those of their agents or service providers view PHI.
- When a user overrides a consent directive, and provides notice to the HIC whose agent overrode the consent directive.
- When a consent directive is created, modified, or withdrawn.

Notes:

- *The Connecting Privacy Committee is developing guidelines for logging and auditing requirements. HICs can use the guidelines to modify their existing practices when they become available.*

Summary of Key Obligations & Potential Impacts to HICs

Obligation	Potential Impact for HICs							Proposed Support to be Provided by eHealth Ontario for:	
	Implementation Activities (One time)	eHealth Ontario's Assessment of Operational Impact for HICs (Ongoing)			HIC's Assessment of Operational Impact			Implementation Support	Ongoing Support
		Summary	Process Change?	Change in CPO workload	Process Change?	Change in Workload	Area of Impact		
Review reports of agents' viewing of PHI	<ul style="list-style-type: none"> Identify person or people in the site that would review user access reports 	<p>New Process:</p> <ul style="list-style-type: none"> Update existing HIC auditing policies and procedures to request audit reports from eHealth Ontario Review audit reports as required in <i>EHR Logging and Auditing Policy</i> and <i>EHR Access Services Schedule</i> 	Yes	Yes - Medium				<ul style="list-style-type: none"> Sample HIC Policy Manual Audit Report Request Form 	<p>Operational</p> <ul style="list-style-type: none"> eHealth Ontario will provide audit reports to sites on request. <p>System Functionality</p> <ul style="list-style-type: none"> N/A
Review reports on consent directive overrides	<ul style="list-style-type: none"> Ensure a process is in place to follow-up with agents that conducted an override 	<p>New Process:</p> <ul style="list-style-type: none"> Review report to identify unusual activity <p>Additional effort:</p> <ul style="list-style-type: none"> 30 minutes / override (see <i>EHR Consent Management Policy</i>) 	Yes	Yes - Low				<ul style="list-style-type: none"> Sample HIC Policy Manual 	<p>Operational</p> <ul style="list-style-type: none"> eHealth Ontario will notify the HIC's privacy contact when one of its agents has overridden a consent directive. <p>System Functionality</p> <ul style="list-style-type: none"> N/A

Obligation	Potential Impact for HICs							Proposed Support to be Provided by eHealth Ontario for:	
	Implementation Activities (One time)	eHealth Ontario's Assessment of Operational Impact for HICs (Ongoing)			HIC's Assessment of Operational Impact			Implementation Support	Ongoing Support
		Summary	Process Change?	Change in CPO workload	Process Change?	Change in Workload	Area of Impact		
Review reports on creation or modification of consent directives	<ul style="list-style-type: none"> Identify person or people in the site that would review the reports 	New Process: <ul style="list-style-type: none"> Review report to identify unusual activity Additional effort: <ul style="list-style-type: none"> 15 minutes / report 	Yes	Yes - Low				<ul style="list-style-type: none"> Sample HIC Policy Manual 	Operational <ul style="list-style-type: none"> eHealth Ontario will provide audit reports to sites. System Functionality <ul style="list-style-type: none"> N/A
Review reports of all other instances when PHI that the HIC contributed to the ConnectingOntario Solution is viewed	<ul style="list-style-type: none"> Identify person or people in the site that would review user access reports 	New Process: <ul style="list-style-type: none"> Review report to identify unusual activity 	Yes	Yes – Medium				<ul style="list-style-type: none"> Sample HIC Policy Manual 	Operational <ul style="list-style-type: none"> eHealth Ontario will provide audit reports to sites. System Functionality <ul style="list-style-type: none"> N/A

6 Privacy and Security Training

Policy Summary

- HICs and Program Office agents and electronic service providers must receive training on their privacy and security obligations by completing privacy and security role-based training prior to being provisioned an account for the ConnectingOntario Solution, and annually thereafter.
- HICs must maintain a log of all of their agents and Electronic Service Providers that have completed the initial and ongoing privacy and security training. eHealth Ontario will maintain a log of all of the Privacy Contact/Officers who receive role-based training from eHealth Ontario.
- eHealth Ontario will prepare and refresh training materials to assist HICs in training their agents and electronic service providers on their obligations. There will be options for how training materials are provided and implemented (e.g. available on the eHealth Ontario website; option to embed into existing LMS).
- End-users accept an end-user agreement outlining base obligations on first accessing the Solution, and annually thereafter.

Summary of Key Obligations & Potential Impacts to HICs

Obligation	Potential Impact for HICs						Proposed Support to be Provided by eHealth Ontario for:		
	Implementation Activities (One time)	eHealth Ontario's Assessment of Operational Impact for HICs (Ongoing)			HIC's Assessment of Operational Impact			Implementation Support	Ongoing Support
		Summary	Process Change?	Change in CPO workload	Process Change?	Change in Workload	Area of Impact		
Train clinical end-users on their obligations prior to first login and annually thereafter	<ul style="list-style-type: none"> • Review ConnectingOntario training policy and materials to identify messages that are not currently communicated to end-users • Determine which training strategy to follow 	<ul style="list-style-type: none"> • Train clinical end-users on their obligations • Track training completion 	Yes	Yes – High (across HIC)				<ul style="list-style-type: none"> • eHealth Ontario provides training materials to support HICs in meeting their training obligations • Privacy and Security Training Strategy 	<p>Operational</p> <ul style="list-style-type: none"> • Training materials posted on the eHealth Ontario Website (eLearning course) or LMS file (to be embedded in site's existing LMS). <p>System Functionality</p> <ul style="list-style-type: none"> • N/A

Obligation	Potential Impact for HICs						Proposed Support to be Provided by eHealth Ontario for:		
	Implementation Activities (One time)	eHealth Ontario's Assessment of Operational Impact for HICs (Ongoing)			HIC's Assessment of Operational Impact			Implementation Support	Ongoing Support
		Summary	Process Change?	Change in CPO workload	Process Change?	Change in Workload	Area of Impact		
Train technical support personnel on their obligations prior to first accessing the ConnectingOntario Solution	<ul style="list-style-type: none"> Review <i>EHR Privacy and Security Training Policy</i> and materials and associated support materials Determine which training strategy to follow 	<ul style="list-style-type: none"> Train technical support agents on their obligations Track training completion 	No	Yes – Medium				<ul style="list-style-type: none"> eHealth Ontario provides training materials that must be used Privacy and Security Training Strategy 	Operational <ul style="list-style-type: none"> Training materials posted on the eHealth Ontario Website (eLearning course) or LMS file (to be embedded in site's existing LMS). System Functionality <ul style="list-style-type: none"> N/A
Train LRAs on their obligations related to adding end-users	<ul style="list-style-type: none"> Review <i>EHR Privacy and Security Training Policy</i> and materials and associated support materials Determine which training strategy to follow 	<ul style="list-style-type: none"> Train LRAs on their obligations Track training completion 	No	Yes – Low				<ul style="list-style-type: none"> eHealth Ontario provides training materials that can be used Privacy and Security Training Strategy 	Operational <ul style="list-style-type: none"> Training materials posted on the eHealth Ontario Website (eLearning course) or LMS file (to be embedded in site's existing LMS). System Functionality <ul style="list-style-type: none"> N/A

Obligation	Potential Impact for HICs						Proposed Support to be Provided by eHealth Ontario for:		
	Implementation Activities (One time)	eHealth Ontario's Assessment of Operational Impact for HICs (Ongoing)			HIC's Assessment of Operational Impact			Implementation Support	Ongoing Support
		Summary	Process Change?	Change in CPO workload	Process Change?	Change in Workload	Area of Impact		
Train privacy contacts on their obligations prior to first accessing the ConnectingOntario Solution	<ul style="list-style-type: none"> Review <i>EHR Privacy and Security Training Policy</i> and materials and associated support materials Determine which training strategy to follow 	Ensure privacy contact is available for an eHealth Ontario-led training session Additional effort: <ul style="list-style-type: none"> Attend 90-minute training session 	No	Yes – Low				<ul style="list-style-type: none"> eHealth Ontario provides training to privacy contacts 	Operational <ul style="list-style-type: none"> For P\privacy contact, eHealth Ontario will host a training webinar and provide support tools eHealth Ontario will track Privacy contact training System Functionality <ul style="list-style-type: none"> N/A
Maintain a log of end-users who have been trained on their obligations	<ul style="list-style-type: none"> Develop log according to the fields required in the <i>EHR Privacy and Security Training Policy</i> 	New Process: <ul style="list-style-type: none"> Documenting training or awareness activities Track who has fulfilled their training obligations Additional effort: <ul style="list-style-type: none"> Maintaining a training tracking log 	Yes	Yes - Low				<ul style="list-style-type: none"> Log for delivery of training Sample HIC Policy Manual 	Operational <ul style="list-style-type: none"> N/A System Functionality <ul style="list-style-type: none"> Solution tracks when users sign EUA which requires them to assert that they have taken training

7 Assurance Policy

Policy Summary

Privacy Impact Assessments (PIAs) and Threshold Risk Assessments (TRAs):

- eHealth Ontario shall conduct PIAs and TRAs as required by the Assurance policy.
- eHealth Ontario makes summaries of applicable PIAs available on its corporate website, with copies available to HICs on request. A summary of the TRA is also available on request.

Privacy and Security Assessments and Attestations:

- eHealth Ontario shall create and maintain the privacy and security readiness self-assessments and operational self-attestations in respect of the ConnectingOntario Solution to assure continued compliance with PHIPA, the policies, procedures and practices implemented in respect of the ConnectingOntario Solution.
- HICs shall complete privacy and security readiness assessments and associated remediation plans prior to creating and contributing, collecting, using, disclosing, viewing, handling or dealing PHI in the ConnectingOntario Solution.
- HICs and eHealth Ontario shall complete privacy and security operational self-attestations and associated remediation plans on an annual frequency.
- The applicable oversight body and eHealth Ontario will review and approve assessments, attestations and remediation plans.
- The applicable oversight body will monitor compliance of eHealth Ontario and HICs with remediation plans.

Auditing and Monitoring:

- Auditing and monitoring of activities related to the ConnectingOntario Solution will occur in accordance with PHIPA, this policy, its associated procedures and practices implemented in respect of the Solution.
- The applicable oversight body will determine if an audit of HICs or eHealth Ontario is required, and the scope, nature and process for the audit

Summary of Key Obligations & Potential Impacts to HICs

Obligation	Potential Impact for HICs							Proposed Support to be Provided by eHealth Ontario for:	
	Implementation Activities (One time)	eHealth Ontario's Assessment of Operational Impact for HICs (Ongoing)			HIC's Assessment of Operational Impact			Implementation Support	Ongoing Support
		Summary	Process Change?	Change in CPO workload	Process Change?	Change in Workload	Area of Impact		
Complete Privacy Readiness Assessments	<ul style="list-style-type: none"> Review and complete Privacy Readiness Assessments 	<ul style="list-style-type: none"> This tool allows sites to assess their privacy readiness prior to go-live <p>Additional Effort:</p> <ul style="list-style-type: none"> One-time prior to implementation 	Yes	Yes – Medium				<ul style="list-style-type: none"> Guidance provided by eHealth Ontario Privacy Office and Service Delivery Partners Implementation and Adoption kick-off webinar Privacy Contact training provided by eHealth Ontario 	<p>Operational</p> <ul style="list-style-type: none"> On-going support provided by eHealth Ontario Privacy Office and Service Delivery Partners N/A <p>System Functionality</p> <ul style="list-style-type: none"> N/A
Complete Self-Attestations	<ul style="list-style-type: none"> N/A 	<ul style="list-style-type: none"> Complete self-attestation <p>New Timelines:</p> <ul style="list-style-type: none"> Yearly <p>Additional Effort:</p> <ul style="list-style-type: none"> Return attestation in timelines defined by eHealth Ontario 	Yes	Yes – Medium				<ul style="list-style-type: none"> N/A 	<p>Operational</p> <ul style="list-style-type: none"> Self-Attestation provided by eHealth Ontario <p>System Functionality</p> <ul style="list-style-type: none"> N/A

8 Retention Policy

Policy Summary

HICs and Program Office must retain records identified in the *EHR Retention Policy* for the time period specified.

HICs and Program Office must retain records not identified in the *EHR Retention Policy* as long as the information is required in respect of the ConnectingOntario solution.

HICs and Program Office must ensure records are protected in accordance with the Harmonized Information Security Policy.

HICs and Program Office must ensure that records are disposed of in a secure manner in accordance with the Harmonized Information Security Policy.

Summary of Key Obligations & Potential Impacts to HICs

Obligation	Potential Impact for HICs						Proposed Support to be Provided by eHealth Ontario for:		
	Implementation Activities (One time)	eHealth Ontario's Assessment of Operational Impact for HICs (Ongoing)			HIC's Assessment of Operational Impact			Implementation Support	Ongoing Support
		Summary	Process Change?	Change in CPO workload	Process Change?	Change in Workload	Area of Impact		
Retain records identified in the <i>EHR Retention Policy</i> for the time period specified	<ul style="list-style-type: none"> Identify the time period required for retention of documents identified in the policy 	<ul style="list-style-type: none"> Retention of records according to the retention period defined 	No	Yes – Low				<ul style="list-style-type: none"> Retention period and reference to documents required. 	Operational <ul style="list-style-type: none"> N/A System Functionality <ul style="list-style-type: none"> N/A