

eHealth Ontario

Inquiries and Complaints Policy

Electronic Health Record

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ConnectingPrivacy Committee Members	2014-06-26

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0.01	2014-11-04	Initial draft based on ConnectingPrivacy Committee Harmonized Inquiries and Complaints Policy v1.1.	Promila Gonsalves, Privacy Analyst, eHealth Ontario

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1 Purpose/ Objective

To define the policies, procedures and practices that apply in receiving, documenting, tracking, addressing and responding to Inquiries and Complaints in respect of the Electronic Health Record (EHR).

2 Scope

This policy and its associated procedures apply to Inquiries and Complaints in respect of the EHR. The EHR is comprised of the ConnectingOntario Solution and the Diagnostic Imaging Common Services Repository. The ConnectingOntario Solution and the Diagnostic Imaging Common Services Repository are classified as clinical repository and/or ancillary systems designed to store and make available specified electronic PHI from the electronic health information systems of HICs¹.

This policy and its associated procedures do not apply to Inquiries or Complaints in respect of any system other than the EHR or in respect of any information other than personal health information (PHI) in the EHR.

3 Policy

3.1 Guiding Policies

- 3.1.1 The *Personal Health Information Protection Act, 2004* (PHIPA) requires a health information custodian (HIC) that is not a natural person, such as a HIC that is a corporation or partnership, to designate a contact person to respond to Inquiries about the HIC's information practices, to receive Complaints about the HIC's alleged contravention of PHIPA and to ensure all agents of the HIC are appropriately informed of their duties under PHIPA.
- 3.1.2 PHIPA permits a HIC that is a natural person to designate a contact person to respond to Inquiries about the HIC's information practices, to receive Complaints about the HIC's alleged contravention of PHIPA and to ensure all agents of the HIC are appropriately informed of their duties under PHIPA. Where a HIC that is a natural person does not designate a contact person to perform these functions, the HIC is required to perform these functions on his or her own.
- 3.1.3 A person who has reasonable grounds to believe that a HIC, eHealth Ontario or one of their agents or Electronic Service Providers has contravened or is about to contravene PHIPA may also make a complaint to the Information and Privacy Commissioner of Ontario.
- 3.1.4 This policy and its associated procedures will support a person in exercising his or her right to make an Inquiry or Complaint in respect of the EHR, and will enable HICs and eHealth Ontario to meet their obligations under PHIPA in this regard.
- 3.1.5 HICs and eHealth Ontario shall have in place and maintain policies, procedures and practices in respect of privacy and security that are necessary to enable them to comply with their obligations under PHIPA, applicable agreements and this policy and its associated procedures.

¹ Variance in policy and procedure requirements between the ConnectingOntario Solution and the Diagnostic Imaging Common Services Repository is highlighted within the policy.

- 3.1.6 HICs and eHealth Ontario shall have in place and maintain policies, procedures and practices in respect of privacy and security that comply with PHIPA and inform their agents and Electronic Service Providers on the policies, procedures and practices as required by PHIPA.
- 3.1.7 eHealth Ontario shall have a program in place to enable HICs and eHealth Ontario to satisfy their obligations in receiving, documenting, tracking, addressing and responding to Inquiries and Complaints in respect of the EHR in accordance with PHIPA, applicable agreements and this policy and its associated procedures.
- 3.1.8 HICs and eHealth Ontario shall take steps that are reasonable in the circumstances to ensure their agents and Electronic Service Providers comply with PHIPA, applicable agreements and this policy and its associated procedures.

4 Procedure

4.1 Procedures Related to Inquiries

Inquiry Relates to the Party Receiving the Inquiry

- 4.1.1 Where a HIC directly receives an Inquiry related solely to the HIC or to the agents or Electronic Service Providers of that HIC², the HIC shall receive, document, track, address and respond directly to the person making the Inquiry as soon as possible, but in any event no later than 30 days following receipt of the Inquiry, in accordance with its internal policies, procedures and practices.
- 4.1.2 Where eHealth Ontario directly receives an Inquiry related solely to eHealth Ontario or to the agents or Electronic Service Providers of eHealth Ontario, eHealth Ontario shall receive, document, track, address and respond directly to the person making the Inquiry as soon as possible, but in any event no later than 30 days following receipt of the Inquiry, in accordance with its internal policies, procedures and practices.

HIC Receives Inquiry Relating to eHealth Ontario, another HIC or More Than One HIC

- 4.1.3 Where a HIC directly receives an Inquiry that it is able to address and respond to related to another HIC, more than one HIC, eHealth Ontario or to the agents or Electronic Service Providers of another HIC, more than one HIC or eHealth Ontario, the HIC receiving the Inquiry shall receive, document, track, address and respond directly to the person making the Inquiry as soon as possible, but in any event no later than 30 days following receipt of the Inquiry, in accordance with its internal policies, procedures and practices.
- 4.1.4 Where a HIC directly receives an Inquiry under paragraph 4.1.3 that it is unable to address and respond to, the HIC shall, as soon as possible, but in any event no later than 4 days following receipt of the Inquiry:
- Notify the person making the Inquiry that the HIC is unable to address and respond to the Inquiry; and
 - Provide the person making the Inquiry with information on how to contact eHealth Ontario to make the Inquiry.

eHealth Ontario Receives Inquiry Relating to One or More HICs

- 4.1.5 Where eHealth Ontario directly receives an Inquiry that it is able to address and respond to related to one or more HICs or to the agents or Electronic Service Providers of one or more HICs, eHealth Ontario shall receive, document, track, address and respond directly to the person making the Inquiry as soon as possible, but in any event no later than 30 days following receipt of the Inquiry, in accordance with its internal policies, procedures and practices.
- 4.1.6 Where eHealth Ontario directly receives an Inquiry that it is unable to address and respond to under paragraph 4.1.5, eHealth Ontario shall:
- Log receipt of the Inquiry;

² All references in this policy and its associated procedures to agents or Electronic Service Providers of a HIC or HICs are references to agents or Electronic Service Providers other than eHealth Ontario or agents and Electronic Service Providers of eHealth Ontario.

- Advise the person making the Inquiry as soon as possible, but in any event no later than 4 days following receipt of the Inquiry, that:
 - eHealth Ontario received the Inquiry;
 - eHealth Ontario will forward the Inquiry to the HIC or HICs to whom the Inquiry relates, as the case may be;
 - The person making the Inquiry will receive a response to the Inquiry from the HIC in paragraph 4.1.7 or eHealth Ontario, as the case may be, as soon as possible, but in any event no later than 30 days following receipt of the Inquiry by eHealth Ontario;
 - The person making the Inquiry will be provided with a revised date for response if the Inquiry cannot be responded to within 30 days following receipt of the Inquiry by eHealth Ontario;
 - Obtain sufficient information from the person making the Inquiry in order to facilitate the preparation of a response to the Inquiry; and
 - Obtain from the person making the Inquiry the preferred method of contact and contact information for the response to the Inquiry.
- 4.1.7 Upon receiving an Inquiry related solely to one HIC, eHealth Ontario shall, as soon as possible, but in any event no later than 4 days following receipt of the Inquiry:
- Forward the Inquiry to the HIC to whom the Inquiry relates;
 - Notify the HIC that the Inquiry received relates solely to that HIC;
 - Provide the HIC with the date that the Inquiry was received by eHealth Ontario;
 - Provide the HIC with information about the identity of the person making the Inquiry, the preferred method of contact of the person making the Inquiry, contact information for the response to the Inquiry and sufficient information to facilitate the preparation of a response to the Inquiry; and
 - Notify the HIC that it must, as soon as possible, but in any event no later than 30 days following receipt of the Inquiry by eHealth Ontario, either respond directly to the person making the Inquiry in accordance with the HIC's internal policies, procedures and practices or provide the person making the Inquiry with a revised date for response if the Inquiry cannot be responded to within that timeframe.
- 4.1.8 Upon receiving a forwarded Inquiry from eHealth Ontario related solely to that HIC, that HIC shall:
- Receive, document, track, address and respond directly to the person making the Inquiry as soon as possible, but in any event no later than 30 days following receipt of the Inquiry by eHealth Ontario, in accordance with its internal policies, procedures and practices;
 - Provide the person making the Inquiry with a revised date for response as soon as possible, but in any event no later than 30 days following receipt of the Inquiry by eHealth Ontario, if the Inquiry cannot be responded to within 30 days following receipt of the Inquiry by eHealth Ontario; and
 - Record that the Inquiry was responded to by maintaining a copy of the response or logging that the Inquiry was responded to.
- 4.1.9 Upon receiving an Inquiry related to more than one HIC, eHealth Ontario shall, as soon as possible, but in any event no later than 4 days following receipt of the Inquiry:
- Forward the Inquiry to each HIC to whom the Inquiry relates;
 - Notify each HIC that the Inquiry received relates to more than one HIC;
 - Provide each HIC with the date that the Inquiry was received by eHealth Ontario;
 - Provide each HIC with information about the identity of the person making the Inquiry; and
 - Advise each HIC that it must, as soon as possible, but in any event no later than 14 days following receipt of the Inquiry by eHealth Ontario, provide to eHealth Ontario the information necessary to enable eHealth Ontario to draft a proposed response to the Inquiry on behalf of each HIC.
- 4.1.10 Upon receiving a forwarded Inquiry from eHealth Ontario related to more than one HIC, each HIC to whom the Inquiry relates shall, as soon as possible, but in any event no later than 14 days following receipt of the

Inquiry by eHealth Ontario, provide eHealth Ontario with the information necessary to enable eHealth Ontario to draft a proposed response to the Inquiry on behalf of each HIC.

- 4.1.11 eHealth Ontario shall, as soon as possible, but in any event no later than 4 days following receipt of the information under paragraph 4.1.10, draft a proposed response to the person making the Inquiry and provide the proposed response to each HIC to whom the Inquiry relates for comments.
- 4.1.12 Upon receiving the proposed response under paragraph 4.1.11, each HIC shall provide comments to eHealth Ontario as soon as possible, but in any event no later than 4 days following receipt of the proposed response. If comments are not provided within 4 days after receipt of the proposed response, it will be assumed that there are no comments.
- 4.1.13 Upon receiving comments on the proposed response to the Inquiry related to more than one HIC, eHealth Ontario shall, as soon as possible, but in any event no later than 4 days following receipt of the comments under paragraph 4.1.12, respond to the person making the Inquiry.
- 4.1.14 Where one or more HICs do not provide the information necessary to enable eHealth Ontario to respond to the Inquiry in accordance with the timelines in paragraph 4.1.10, eHealth Ontario shall provide written notice to the person making the Inquiry that one or more HICs have failed to respond to the Inquiry and that the person may make an Inquiry or Complaint to one or more of the HICs that failed to respond and/or a complaint to the Information and Privacy Commissioner of Ontario.
- 4.1.15 Where the Inquiry is related to more than one HIC, eHealth Ontario shall provide the person making the Inquiry with a revised date for response if the Inquiry cannot be responded to within 30 days following receipt of the Inquiry by eHealth Ontario.

4.2 Procedures Related to Complaints

Complaint Relates to the Party Receiving the Complaint

- 4.2.1 Where a HIC directly receives a Complaint related solely to the HIC or to the agents or Electronic Service Providers of that HIC, the HIC shall receive, document, track, investigate, remediate and respond directly to the person making the Complaint as soon as possible, but in any event no later than 30 days following receipt of the Complaint, in accordance with its internal policies, procedures and practices.
- 4.2.2 Where eHealth Ontario directly receives a Complaint related solely to eHealth Ontario or to the agents or Electronic Service Providers of eHealth Ontario, eHealth Ontario shall receive, document, track, investigate, remediate and respond directly to the person making the Complaint as soon as possible, but in any event no later than 30 days following receipt of the Complaint, in accordance with its internal policies, procedures and practices.

HIC Receives Complaint Relating to eHealth Ontario, Another HIC or More Than One HIC

- 4.2.3 Where a HIC directly receives a Complaint related to another HIC, more than one HIC, eHealth Ontario or to the agents or Electronic Service Providers of another HIC, more than one HIC or eHealth Ontario, the HIC receiving the Complaint shall, as soon as possible, but in any event no later than 4 days following receipt of the Complaint:
 - Notify the person making the Complaint that the HIC is unable to address and respond to the Complaint; and
 - Provide the person making the Complaint with information on how to contact eHealth Ontario to make the Complaint.

eHealth Ontario Receives Complaint Relating to One or More HICs

- 4.2.4 Where eHealth Ontario directly receives a Complaint related to one or more HICs or to the agents or Electronic Service Providers of one or more HICs, eHealth Ontario shall:
 - Log receipt of the Complaint;
 - Advise the person making the Complaint as soon as possible, but in any event no later than 4 days following receipt of the Complaint, that:
 - eHealth Ontario received the Complaint;
 - eHealth Ontario will forward the Complaint to the HIC or HICs to whom the Complaint relates, as the case may be;

- The person making the Complaint will receive a response to the Complaint from the HIC in paragraph 4.2.7 or eHealth Ontario, as the case may be, as soon as possible, but in any event no later than 30 days following receipt of the Complaint by eHealth Ontario;
 - The person making the Complaint will be provided with a revised date for response if the Complaint cannot be responded to within 30 days following receipt of the Complaint by eHealth Ontario;
- Obtain sufficient information from the person making the Complaint in order to facilitate the preparation of a response to the Complaint; and
 - Obtain from the person making the Complaint the preferred method of contact and contact information for the response to the Complaint.
- 4.2.5 Where eHealth Ontario receives an anonymous Complaint, that Complaint shall be reported, contained, investigated and remediated in accordance with the *Electronic Health Record Privacy Breach Management Policy* or the *Electronic Health Record Information Security Incident Management Policy* and their associated procedures, as amended from time to time. eHealth Ontario shall take all reasonable steps to inform the person making an anonymous Complaint of the possible limitations related to the investigation of anonymous Complaints, which include:
- Limitations on investigating a Complaint related to records of personal health information of an anonymous individual; and
 - Limitations on proactively and directly providing the person making the anonymous Complaint a response to the Complaint.
- 4.2.6 Upon receiving a Complaint related solely to one HIC, eHealth Ontario shall, as soon as possible, but in any event no later than 4 days following receipt of the Complaint:
- Forward the Complaint to the HIC to whom the Complaint relates;
 - Notify the HIC that the Complaint received relates solely to that HIC;
 - Provide the HIC with the date that the Complaint was received by eHealth Ontario;
 - Provide the HIC with information about the identity of the person making the Complaint, the preferred method of contact of the person making the Complaint, contact information for the response to the Complaint and sufficient information to facilitate the preparation of a response to the Complaint; and
 - Notify the HIC that it must, as soon as possible, but in any event no later than 30 days following receipt of the Complaint by eHealth Ontario, either respond directly to the person making the Complaint in accordance with the HIC's internal policies, procedures and practices or provide the person making the Complaint with a revised date for response if the Complaint cannot be responded to within that timeframe.
- 4.2.7 Upon receiving a forwarded Complaint from eHealth Ontario related solely to that HIC, that HIC shall:
- Receive, document, track, investigate, remediate and respond directly to the person making the Complaint as soon as possible, but in any event no later than 30 days following receipt of the Complaint by eHealth Ontario, in accordance with the HIC's internal policies, procedures, and practices;
 - Provide the person making the Complaint with a revised date for response as soon as possible, but in any event no later than 30 days following receipt of the Complaint by eHealth Ontario, if the Complaint cannot be responded to within 30 days following receipt of the Complaint by eHealth Ontario; and
 - Record that the Complaint was responded to by maintaining a copy of the response or logging that the Complaint was responded to.
- 4.2.8 Upon receiving a Complaint related to more than one HIC, eHealth Ontario shall, as soon as possible, but in any event no later than 4 days following receipt of the Complaint:
- Forward the Complaint to each HIC to whom the Complaint relates;
 - Notify each HIC that the Complaint received relates to more than one HIC;
 - Provide each HIC with the date that the Complaint was received by eHealth Ontario;

- Provide each HIC with information about the identity of the person making the Complaint; and
 - Advise each HIC that it must, as soon as possible, but in any event no later than 14 days following receipt of the Complaint by eHealth Ontario, provide to eHealth Ontario the information necessary to enable eHealth Ontario to determine whether to investigate the Complaint and, if the Complaint will not be investigated, to draft a proposed response to the Complaint on behalf of each HIC.
- 4.2.9 Upon receiving a forwarded Complaint from eHealth Ontario related to more than one HIC, each HIC to whom the Complaint relates shall, as soon as possible, but in any event no later than 14 days following receipt of the Complaint by eHealth Ontario, provide eHealth Ontario with the information necessary to enable eHealth Ontario to determine whether to investigate the Complaint and, if the Complaint will not be investigated, to draft a proposed response to the Complaint on behalf of each HIC.
- 4.2.10 eHealth Ontario shall, as soon as possible, but in any event no later than 4 days following receipt of the information under paragraph 4.2.9, determine whether to investigate the Complaint. A Complaint shall be investigated where the Complaint relates to an actual or suspected Privacy Breach or to an actual or suspected Security Breach that has occurred or is about to occur in respect of the EHR.
- 4.2.11 Where the Complaint relates to more than one HIC and eHealth Ontario has made a determination to investigate the Complaint under paragraph 4.2.10, eHealth Ontario shall notify each HIC to whom the Complaint relates that:
- eHealth Ontario has made a determination to investigate the Complaint;
 - The Complaint relates to an actual or suspected Privacy Breach or an actual or suspected Security Breach that has occurred or is about to occur in respect of the EHR; and
 - The Complaint will be reported, contained, investigated and remediated and notification will be provided in accordance with the *Electronic Health Record Privacy Breach Management Policy* and its associated procedures or will be reported, contained, investigated and remediated in accordance with the *Electronic Health Record Information Security Incident Management Policy* and its associated procedures, as amended from time to time.
- 4.2.12 Where the Complaint relates to an actual or suspected Privacy Breach, the actual or suspected Privacy Breach shall be reported, contained, investigated and remediated and notification shall be provided in accordance with the *Electronic Health Record Privacy Breach Management Policy* and its associated procedures, as amended from time to time.
- 4.2.13 Where the Complaint relates to an actual or suspected Security Breach, the actual or suspected Security Breach shall be reported, contained, investigated and remediated in accordance with the *Electronic Health Record Information Security Incident Management Policy* and its associated procedures, as amended from time to time.
- 4.2.14 Where the Complaint relates to an actual or suspected Security Breach or where the Complaint relates to an actual or suspected Privacy Breach and the Complaint is made by a person other than the individual to whom the personal health information relates, eHealth Ontario shall respond to the person making the Complaint as soon as possible, but in any event no later than 5 days after receipt of the written report approved by the applicable oversight body under the *Electronic Health Record Privacy Breach Management Policy* or *Electronic Health Record Information Security Incident Management Policy* and their associated procedures, as amended from time to time. At a minimum, the response shall:
- Acknowledge receipt of the Complaint;
 - Indicate that an investigation was undertaken in response to the Complaint;
 - Indicate whether or not a Privacy Breach or Security Breach occurred and, if so, provide a description of the Privacy Breach or Security Breach and the scope of and circumstances in which the Privacy Breach or Security Breach occurred;
 - Provide a summary of the results of the investigation and the measures that have been or will be implemented to remediate the Privacy Breach or Security Breach and to prevent similar Privacy Breaches or Security Breaches in future;
 - Provide the name and contact information for the person or persons to whom the person making the Complaint may address inquiries or concerns; and
 - Advise the person making the Complaint that he or she may make a complaint to the Information and Privacy Commissioner of Ontario.

- 4.2.15 Where eHealth Ontario has made a determination not to investigate the Complaint under paragraph 4.2.10, eHealth Ontario shall, as soon as possible, but in any event no later than 4 days following receipt of the information under paragraph 4.2.9:
- Notify each HIC to whom the Complaint relates that eHealth Ontario has made a determination not to investigate the Complaint; and
 - Provide each HIC with a proposed response to the person making the Complaint and advise each HIC that it must, as soon as possible, but in any event no later than 4 days following receipt of the proposed response, provide comments on the proposed response to eHealth Ontario to enable eHealth Ontario to respond to the Complaint on behalf of each HIC.
- 4.2.16 Upon receiving the proposed response under paragraph 4.2.15, each HIC shall provide comments to eHealth Ontario as soon as possible, but in any event no later than 4 days following receipt of the proposed response. If comments are not provided within 4 days after receipt of the proposed response, it will be assumed that there are no comments.
- 4.2.17 Upon receiving comments on the proposed response to the Complaint related to more than one HIC, eHealth Ontario shall, as soon as possible, but in any event no later than 4 days following receipt of the comments, respond to the person making the Complaint. At a minimum, the response shall:
- Provide a response to the Complaint;
 - Provide the name and contact information for the person or persons to whom the person making the Complaint may address inquiries or concerns; and
 - Advise the person making the Complaint that he or she may make a complaint to the Information and Privacy Commissioner of Ontario.
- 4.2.18 Where one or more HICs do not provide the information necessary to enable eHealth Ontario to respond to the Complaint in accordance with the timelines in paragraph 4.2.9, eHealth Ontario shall provide written notice to the person making the Complaint that one or more HICs have failed to respond to the Complaint and that the person may make a Complaint to one or more of the HICs that failed to respond and/or a complaint to the Information and Privacy Commissioner of Ontario.
- 4.2.19 eHealth Ontario shall provide the person making the Complaint with a revised date for response if the Complaint cannot be responded to within 30 days following receipt of the Complaint by eHealth Ontario.

5 Enforcement³

- 5.1.1 All instances of non-compliance will be reviewed by the applicable privacy and security committee. The applicable privacy and security committee will recommend appropriate action to applicable oversight body.
- 5.1.2 The applicable oversight body has the authority to impose appropriate penalties, up to and including termination of the applicable agreements with the HIC or termination of the access privileges of agents and Electronic Service Providers, and to require the implementation of remedial actions.

6 Glossary and Terms

Electronic Health Record (EHR)

The ConnectingOntario Solution and the Diagnostic Imaging Common Services Repository which are classified as clinical repository and/or ancillary systems designed to store and make available specified electronic PHI from the electronic health information systems of HICs to act as a single repository.

Complaint

³ References to the applicable privacy and security committee and the applicable oversight body can be found in [*Table 1: Applicable Governance Bodies*](#).

A concern raised by any person in respect of the EHR including, but not limited to, concerns raised in respect of compliance with PHIPA, applicable agreements and the policies, procedures and practices implemented in respect of the EHR.

Electronic Service Provider

A person who provides goods or services for the purpose of enabling a HIC to use electronic means to collect, use, modify, disclose, retain or dispose of PHI, and includes a health information network provider.

Inquiry

A question raised by any person in respect of the EHR including, but not limited to, questions raised in respect of:

- When, how and the purposes for which PHI in the EHR is collected, used or disclosed or viewed, handled or otherwise dealt with;
- The administrative, technical and physical safeguards and practices maintained in respect of PHI in the EHR;
- The policies, procedures and practices implemented in respect of the EHR; and
- Compliance with PHIPA, applicable agreements and the policies, procedures and practices implemented in respect of the EHR.

Privacy Breach

Privacy Breach has the same meaning as in the *Electronic Health Record Privacy Breach Management Policy* and its associated procedures, as amended from time to time.

Security Breach

Security Breach has the same meaning as in the *Electronic Health Record Information Security Incident Management Policy* and its associated procedures, as amended from time to time.

Policy Governance Structure	ConnectingOntario Solution	Diagnostic Imaging Common Services Repository
Applicable Privacy and Security Committee	Privacy: Connecting Privacy Committee Security: Connecting Security Committee	Privacy: Diagnostic Imaging Common Services Privacy and Security Working Group Security: Connecting Security Committee
Applicable Oversight Body	Privacy: ConnectingOntario Committee Security: eHealth Ontario Strategy Committee	Privacy: Diagnostic Imaging Common Services Executive Committee Security: eHealth Ontario Strategy Committee

Table 1: Applicable Governance Bodies

Term or Acronym	Definition
HIC	Health Information Custodian
PHI	Personal Health Information, as defined in the <i>Personal Health Information Protection Act, 2004</i>
PHIPA	<i>Personal Health Information Protection Act, 2004</i>

7 References and Associated Documents

Personal Health Information Protection Act, 2004 (PHIPA)

Electronic Health Record Privacy Breach Management Policy and its associated procedures

Electronic Health Record Information Security Incident Management Policy and its associated procedures