

Provincial Client Registry (ProvCR) Phase 1 Bundle 2

Privacy Impact Assessment Summary

Introduction

In December 2014, a privacy impact assessment (PIA) on the Provincial Client Registry (ProvCR) Phase 1 Bundle 2 initiative was completed as required under the Ontario Regulation (O.Reg.) 329/04 under the *Personal Health Information Protection Act, 2004 (PHIPA)*, and *eHealth Ontario's Personal Health Information Privacy Policy*.

ProvCR is the provincial authoritative source for patient identification information about individuals recognized as clients of the health system. This information will be leveraged by eHealth Ontario systems to assist health care providers in accurately identifying patients and finding their corresponding electronic health record. The first clinical use of ProvCR – currently in a pilot phase – supports the diagnostic imaging common service (DI CS), which enables health care providers to retrieve DI reports.

The following is a summary of the PIA, including a brief background on ProvCR and key findings.

Background

eHealth Ontario is required to connect the ProvCR to health systems across the province so health care providers have access to a provincial authoritative source of patient identification information. This resolves multiple identifiers (e.g. health card numbers and medical record numbers) used across health care systems to identify a single patient. It is integral to the successful operation of an electronic health record, to ensure that patients, whose information is recorded in the EHR, are uniquely identified. As well, the ProvCR is integral to ensuring patients' clinical information is consistently managed in the EHR, which includes supporting health care organizations access request process and the application of consent directives across the EHR.

The use of ProvCR data results in the following benefits:

- Serve as an identity management system that links and integrates patient records accurately;
- Eliminate duplicate patient records;
- Enable timely access to information for improved decision making at the point of care;
- Improve workflow for health care providers reducing dependency on paper-based systems; and
- Ensure fewer gaps in patient information as patients move between health care settings.

Summary of Privacy Impact Assessment

The PIA identifies privacy requirements, risks and recommendations for ProvCR as a result of changes to technology, use, disclosure and safeguards. This direction supports eHealth Ontario in building a privacy compliant solution based on a risk management approach. It allows eHealth Ontario to identify opportunities as early as possible to preserve or enhance Ontarian's privacy rights through the design and operation of ProvCR.

The PIA concludes that eHealth Ontario has the overall PHIPA authority under section 6.2 of O.Reg. 329/04 to use ProvCR data for the purposes of creating and maintaining an EHR. ProvCR data will be made available to health care providers who use DI CS to accurately identify patients in order to find their corresponding electronic health record.

eHealth Ontario has a robust infrastructure with strong privacy and security safeguards suitable for the processing and sharing of PHI. The PIA makes a recommendation to ensure that data received and utilized by eHealth Ontario for the purposes of maintaining and operating the ProvCR complies with O.Reg. 329/04, section 6.2 as well as its policies, procedures and privacy best practices.

Summary of Recommendations

- eHealth Ontario to enter into agreements with the MOHLTC to operate the ProvCR and make patient identification information available to health care providers through the EHR.

eHealth Ontario is currently initiating this recommendation.

Glossary

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| DI CS | Diagnostic Imaging Common Service |
| MOHLTC | Ministry of Health Long Term Care |
| O.Reg. | Ontario Regulation |
| PHIPA | Personal Health Information Protection Act |
| PIA | Privacy Impact Assessment |
| ProvCR | Provincial Client Registry |

Contact Information

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

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