eHealth Ontario
www.ehealthontario.on.ca

OLIS Portlet and Client Selector Portlet Integration into ONE® Portal

Delta Privacy Impact Assessment Summary

Ontario
eHealth Ontario

Introduction

eHealth Ontario completed a delta assessment to the PIA on the Ontario laboratories information system PIA (OLIS) and the client registry (CR) PIA, in accordance with Ontario Regulation (O.Reg.) 329/04 under the *Personal Health Information Protection Act, 2004* (PHIPA) and eHealth Ontario's personal health information privacy policy. The delta PIA, completed on April 2012, provided an analysis of the integration of eHealth Ontario's OLIS portlet and client selector portlet in eHealth Ontario's ONE® Portal.

The delta PIA found that eHealth Ontario will provide electronic services for the purpose of enabling health information custodians (OLIS adopters) to use electronic means to access the personal health information (PHI) in OLIS, in accordance with section 6(1) of PHIPA O. Reg. 329/04, where eHealth Ontario will not be acting as an agent of the Ministry of Health and Long-Term Care (MOHLTC) to provide OLIS adopters with the technical means (i.e., the OLIS portlet through ONE Portal) to access the lab data for which they are the custodians. The delta PIA also found that eHealth Ontario has the authority under section 6.2 of O.Reg. 329/04 to access and make accessible the relevant PHI (Registered Persons Database [RPDB]) maintained in the CR to participating OLIS laboratories for the purpose of facilitating OLIS data validation by the laboratories.

The following is a summary of the PIA, including a brief background on the initiative to integrate the OLIS portlet and client selector portlet in eHealth Ontario's ONE Portal, its key findings, and eHealth Ontario's progress in implementing the recommendations identified in the PIA.

Background

In order to provide accurate laboratory results and information about patients to end users who use the data in hospitals and other health care settings to provide care to patients, the laboratories who submit data must validate its accuracy and completeness after it is transferred from their local systems to OLIS. In order to do this, the OLIS adopters receive access to OLIS data they have submitted through eHealth Ontario's ONE Portal. OLIS adopters are granted access to ONE Portal through eHealth Ontario's ONE ID program.

eHealth Ontario has developed a client selector portlet, through which CR data (populated with RPDB data from the MOHLTC) is made available to OLIS adopters. The purpose of making the client selector portlet available to the OLIS adopters is to ensure that the correct OLIS record is accessed for the correct patient. The deployment of the client selector portlet through ONE Portal is the first use of this portlet.

eHealth Ontario's OLIS portlet will provide each OLIS adopter with access to the lab data that was submitted to OLIS by that laboratory. Only the lab data that was originally contributed by each OLIS adopter is made available through the OLIS portlet to each OLIS adopter. The purpose of making previously contributed laboratory data available to each OLIS adopter is to verify accuracy and completeness of the data.

Summary of Privacy Impact Assessment

The scope of the OLIS portlet and client selector portlet integration in ONE Portal delta PIA includes and analysis on the flow of information to and from the portlets in the OLIS community that are used by OLIS adopters for the purposes of validating the accuracy and completeness of lab data; the introduction of the client selector portlet and the OLIS portlet into the OLIS client self-test (CST) and production environments in ONE Portal; the purposes and processes for verifying lab data within the OLIS community in ONE Portal; and the safeguards which have been put in place to ensure that all collections, uses and disclosures of PHI occur

in a secure and privacy-sensitive manner, and are in compliance with eHealth Ontario's privacy policies, relevant agreements and legislative requirements.

The PIA concludes that eHealth Ontario has the overall PHIPA authorities for making the OLIS portlet and client selector portlet available in the ONE Portal, under s. 6(1) and 6.2 of O.Reg. 329/04. Additionally, eHealth Ontario has a robust infrastructure for the processing of sensitive PHI, with policies and practices to protect the privacy of Ontarians and the security of the information in the custody of eHealth Ontario.

The PIA makes recommendations to ensure that the data received and utilized by eHealth Ontario, for the purposes of the client registry, complies with PHIPA and O.Reg. 329/04 as well as eHealth Ontario policies, procedures and privacy best practices.

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

The Delta PIA provides a number of recommendations associated with this initiative, as summarized below:

1. The ZBR.4 filter, which ensures each OLIS adopter only sees the lab data submitted to OLIS by that lab, to be implemented prior to go-live.

2. Additional data elements (patient address and phone number) to be removed from the current client selector portlet prior to go-live.

3. eHealth Ontario to develop and document an access control procedure, which sets out the approvals process for access to PHI within eHealth Ontario's systems by eHealth Ontario staff and service providers.

4. A periodic review of system audit logs to be completed to ensure there is no inappropriate access to OLIS data.

5. eHealth Ontario to implement all threat risk assessment (TRA) recommendations prior to go-live.

eHealth Ontario has implemented all the recommendations identified in the 2012 OLIS portlet and client selector portlet in ONE Portal delta PIA.

Glossary

CR	Client registry
CST	Client self-test
MOHLTC	Ministry of Health and Long-Term Care
OLIS	Ontario laboratories information system
O.Reg.	Ontario Regulation
PHIPA	*Personal Health Information Protection Act, 2004*
PHI	Personal health information
PIA	Privacy impact assessment
RPDB	Registered Persons Database
TRA	Threat risk assessment

Contact Information

Please contact the eHealth Ontario privacy office should you have any questions about the OLIS portlet and client selector portlet integration into ONE Portal delta PIA summary:

eHealth Ontario
Privacy office
777 Bay Street, Suite 701
Toronto Ontario M5B 2E7
Tel: (416) 946-4767
privacy@ehealthontario.on.ca