

ConnectingOntario Release 10

Delta Privacy Impact Assessment Summary



#### Introduction

eHealth Ontario has complete a delta privacy impact assessment (dPIA) for the ConnectingOntario solution was on July 25, 2018, in accordance with Ontario Regulation 329/04 (O.Reg.329) made under the *Personal Health Information Protection Act*, 2004 (PHIPA), and eHealth Ontario's Personal Health Information Privacy Policy.

The PIA identifies privacy requirements, risks, and recommendations for ConnectingOntario Release 10. This allows eHealth Ontario to build a privacy compliant solution using risk management principles and to identify opportunities to promote privacy rights of Ontarians.

The following summary includes a brief background on the initiative and key findings of the assessment.

### **Background**

ConnectingOntario improves the patient and health care provider experience by providing point-of-care access to digital patient data from across the care continuum. This allows timely initiation of treatment and increased coordination amongst individual health care providers. This health information includes data from regional and provincial data services such as the Ontario Laboratory Information System (OLIS) and the Digital Health Drug Repository (DHDR). ConnectingOntario Release 10 will make DI CS data accessible through the solution as well.

This dPIA provides an analysis of ConnectingOntario Release 10 that most significantly includes the introduction of a new diagnostic imaging portlet that will source both images and reports using the Diagnostic Imaging Common Service (DI Cs). The release also includes viewer enhancements that improve the way information is displayed further to feedback from the cOntario Clinical Working Group and changes to update how object identifiers are managed.

Currently, ConnectingOntario healthcare providers can access DI health records (reports only) contributed by the ConnectingOntario data contributors within the ConnectingOntario Clinical Data Repository (CDR). DI CS integration will provide ConnectingOntario healthcare providers access to the provincial DI health records (reports <u>and</u> images) from Ontario's three regional Diagnostic Imaging Repositories and Independent Health Facilities:

- The Northern and Eastern Ontario Diagnostic Imaging Network (NEODIN)
- Southwestern Ontario Diagnostic Imaging Network (SWODIN)
- Hospital Diagnostic Imaging Repository Services (HDIRS)
- Independent Health Facilities (IHF)

As a result, ConnectingOntario users will have a more fulsome diagnostic imaging result set.

# **Summary of Privacy Impact Assessment**

The PIA concludes that eHealth Ontario operates both DI CS and the ConnectingOntario solution as part of the Electronic Health Record (EHR) pursuant to section 6.2 of O.Reg.329/04 to make data available to healthcare providers for the purpose of providing or assisting in the provision of care.

The dPIA makes two recommendations to ensure that the data received and utilized by eHealth Ontario, complies with PHIPA, as well as, eHealth Ontario policies, procedures and privacy best practices.

### Summary of Recommendations

The dPIA makes the following recommendations:

- 1. It is recommended that eHealth Ontario's Product Management team ensures that consent directive override functionality is introduced at the next available release.
- It is recommended that a plan be developed to decommission the diagnostic imaging contribution feed to the CDR and that the terminology and mapping assessment performed by Architecture and Standards is periodically reviewed to ensure that modifications to ConnectingOntario queries continue to ensure duplicate data is not rendered in the viewer.

eHealth Ontario is currently in the process of taking steps to have each of these recommendations implemented.

## Glossary

CDR	Clinical Data Repository
DHDR	Digital Health Drug Repository
DI CS	Diagnostic Imaging Common Services
EHR	Electronic Health Record
HDIRS	Hospital Diagnostic Imaging Repository Services
IHF	Independent Health Facilities
NEODIN	The Northern and Eastern Ontario Diagnostic Imaging Network
OLIS	Ontario Laboratory Information System
O. Reg.329	Ontario Regulation 329/04
PHI	Personal Health Information
PHIPA	Personal Health Information Protection Act, 2004
PIA	Privacy Impact Assessment
SWODIN	Southwestern Ontario Diagnostic Imaging Network

## **Contact Information**

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

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