## **Privacy Officer Update - Accessing Digital Health Drug Repository Data (DHDR) via the ConnectingOntario ClinicalViewer**

As of July 1, 2017, the ConnectingOntario ClinicalViewer will contain a “**Dispensed Medications**” tab in the Medications Portlet to include personal health information from the provincial Digital Health Drug Repository (DHDR). This tab will contain patient records for publicly funded drugs and pharmacy services as well as monitored drugs, which are held and being disclosed by the Ministry of Health and Long-Term Care (MOHLTC).

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| **Patient Requests**  When discussing patient privacy in respect of this new information, be sure to refer to DHDR as **Publicly Funded Drugs and Pharmacy Services and Monitored Drugs**.  The patient must contact the **ServiceOntario INFOline** toll-free at 1-800- 291-1405 (TTY: 1-800-387-5559) for all:   * privacy-related inquiries or complaints, * requests for corrections to a patient’s drug and pharmacy services information in the DHDR, * requests to find out who in Ontario has accessed a patient’s drug and pharmacy services information via the DHDR in a given timeframe, * requests regarding what drugs and pharmacy services information the MOHLTC makes available through the DHDR, * block or unblock access to a patient’s information in the DHDR (consent directive). | **Training Requirements** You must ensure end users with access to ConnectingOntario ClinicalViewer have been trained on their privacy and security obligations with respect to DHDR on an annual basis.  Since you have already delivered training to your staff, you must supplement your privacy and security training by circulating the **Summary of Privacy and Security Requirements for End Users of the ConnectingOntario ClinicalViewer** and ensure you track which end users have received the Summary. End users must receive this Summary by **July 1, 2017**.  The DHDR messages must be incorporated in your next round of annual training. These messages can also be found in the [**EHR Privacy Toolkit**](https://www.ehealthontario.on.ca/en/support/)**[[1]](#footnote-1)**. |
| **Consent Management**A patient may make a consent directive request to block all records in DHDR.The MOHLTC requires all users who override a consent directive in DHDR to print a hard-copy express consent form[[2]](#footnote-2) and receive a signature from the patient or substitute decision maker. This form may be printed from the Consent Override Dialogue box directly from the ConnectingOntario ClinicalViewer and should be retained as part of the patient’s chart. **A consent directive for risk of harm to DHDR data is not permitted.****Important:** When user performs an override in the ConnectingOntario ClinicalViewer, all portlets where a consent directive is applied will be unmasked. If a block is indicated in the Dispensed Medications tab the user must complete the hard-copy express consent form. Although the data in this portlet may not be required to provide care, an override in another portlet will also release this data.When consent directive override is performed in ConnectingOntario ClinicalViewer, unmasking the Dispensed Medications tab, the information will be viewable to any user at the health information custodian organization for a 4-hour period.The patient/SDM will receive notification from the MOHLTC whenever their consent directive in the DHDR is overridden.You, the Privacy Officer, will receive an email from the eHealth Ontario Privacy Office to investigate the access. Verify express consent was received by the individual for access to DHDR by reviewing the express consent form. | **Audit Requirements**Access to DHDR, via the Medications Portlet, is captured in the audit reports you receive for the ConnectingOntario ClinicalViewer[[3]](#footnote-3). As such, there are no new or additional auditing requirements for DHDR - complete audit reports as required.In the event you require a specific report for DHDR (i.e. internal investigation), you may make the following requests to eHealth Ontario Service Desk for the following audit reports:**By organization request**: eHealth Ontario will provide you with a report of all users in your organization who have accessed DHDR data in the timeframe set out in the request.**By user request**: eHealth Ontario will provide you with a report of all accesses to DHDR data by a particular user from your organization in the timeframe set out in the request.**REMINDER** - **all privacy incidents or breaches involving ConnectingOntario, OLIS and DHDR must be immediately reported** to the **eHealth Ontario’s Service Desk 1-866-250-1554**. Advise the Service Desk that you would like to open a breach / incident ticket. |

For a complete list of information available click here: [Information Available to Health Care Providers through the Digital Health Drug Repository](http://www.forms.ssb.gov.on.ca/mbs/ssb/forms/ssbforms.nsf/FormDetail?OpenForm&ACT=RDR&TAB=PROFILE&SRCH=&ENV=WWE&TIT=5056-87E&NO=014-5056-87E).

For more information, refer to the DHDR or Clinical Data Repository Health Care Provider Guides at: <https://www.ehealthontario.on.ca/en/support/>

1. Note: DHDR content will be available July 1, 2017 [↑](#footnote-ref-1)
2. [MOHLTC Temporary Unblocking Access to Your Drug and Pharmacy Service Information (5047-87)](http://www.forms.ssb.gov.on.ca/mbs/ssb/forms/ssbforms.nsf/GetFileAttach/5047-87E~1/$File/5047-87E.pdf) [↑](#footnote-ref-2)
3. With the exception of the Consent Directive Override Report. [↑](#footnote-ref-3)