

eHealth Ontario

ONE[®] ID Alternative Registry Local Registration Authority Procedures Manual

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Table of Contents

1.0	About This Document	1
1.1	Purpose	1
1.2	Audience.....	1
1.3	Reference Material	1
2.0	Introduction	2
2.1	Registration Roles.....	2
3.0	Registration Overview	3
3.1	Infrastructure of Trust.....	3
3.1.1	Building Trust	3
3.2	Registration.....	4
3.2.1	Registration Record	4
3.3	Sponsorship and Service Enrolment	5
4.0	The Role of the Alternative Registry LRA	6
4.1	Duties and Responsibilities.....	6
4.2	Support.....	6
5.0	Information and Change Management	7
5.1	Information Management	7
5.1.1	Information Collection	7
5.1.2	Information Storage and Retention.....	7
5.2	Consent	8
6.0	Registering an Individual in ONE ID	9
6.1	Registrant's Responsibilities	9
6.2	Information Requirements	9
6.2.1	Core Identity Information	9
6.2.2	Other Applicant Information	9
6.2.3	Challenge Questions	10
6.3	Overview: Registering an Individual	10
7.0	Registrant Support and Maintenance	11
7.1	Account Self-Management	11
7.2	Suspending / Revoking a Registration	11
7.3	Changing Registrant's Identity Information	12
7.4	Changing a Registrant's Support Challenge Questions.....	13
8.0	Compliance and Assurance	14
8.1	Monitoring the Activities of Alternative Registry LRAs.....	14
8.1.1	Auditing of Alternative Registry LRAs.....	14
8.1.2	Verifying Registration	14

1.0 About This Document

1.1 Purpose

This document provides step-by-step procedures for Alternative Registry Local Registration Authority (LRA) to facilitate or expedite ONE® ID Registration potential Registrants for ONE® ID whose identity has been validated by Alternative Registry Owner. Alternative Registry LRAs will only be established once the alternative registry assessment is complete and the alternative registry is approved for use with ONE® ID.

1.2 Audience

This document is intended for Alternative Registry LRAs, who have been given the authority to perform registrations on behalf of eHealth Ontario and their organizations. It is assumed that the audience has an intermediate level of understanding of the concepts surrounding registration, service enrolment, and change management.

1.3 Reference Material

As an Alternative Registry LRA, you are expected to be familiar with the documents listed below, all of which can be found on the Registration Community Site (www.ehealthontario.on.ca/one-id-lra).

ONE® ID Policy and Standards

These documents contain policies related to registering and enrolling individuals with ONE® ID:

- **ONE® ID Policy**: This document contains policies related to registering and enrolling individuals with ONE® ID.
- **ONE® ID Alternative Registry Standard**: This document contains standards related to alternative registry with ONE® ID.
- **ONE® ID Registrant Reference Guide**: This document provides the Registrant with detailed procedures to self-manage their ONE® ID account.
- **ONE® ID Acceptable Use Policy**: This document must be agreed to by all Registrants (including Alternative Registry LRAs) of services protected by ONE® ID.
- **ONE® ID Notice of Collection**: This document must be agreed to by all Registrants for the collection, use, and disclosure of personal information.
- **Privacy FAQs**: This document addresses some basic questions about Privacy and Security practices endorsed by eHealth Ontario.
- **LRA Acknowledgement**: This document must be agreed to by Alternative Registry LRAs to acknowledge their obligations as an LRA.

2.0 Introduction

ONE® ID is a set of systems and business processes that provides trusted and secure access to eHealth Ontario applications and services to healthcare providers registered with eHealth Ontario.

ONE® ID enables registration, authentication, and authorization for access to designated eHealth Ontario systems. The purpose of the ONE® ID system is to ensure that only those individuals who are authorized to electronically access personal health information (PHI) under the control of eHealth Ontario are capable of doing so.

ONE® ID leverages approved registries as an Alternative Registry that contains an encrypted list of Registrants whose identity has been validated by the Alternative Registry Owner. In order to facilitate ONE® ID Registration, eHealth Ontario may rely on the identity information in an Alternative Registry to validate Registrants' identity.

An Alternative Registry is developed or managed by an organization that:

1. Is not a Health Information Custodian (HIC); and
2. Demonstrates a documented and verifiable relationship with an acknowledged health sector regulatory body, administrative agency, or other health sector organization recognized by eHealth Ontario.

Your organization's registry has been approved by eHealth Ontario as an Alternative Registry for ONE® ID Registration. As an Alternative Registry LRA, you will facilitate the ONE® ID Registration process for approved individuals within your registry by providing the required registrant information to generate ONE® ID credentials.

2.1 Registration Roles

There are several **key** roles to authorizing registrations.

Role	Description	Example
Legally Responsible Person (LRP)	Person who is legally responsible for the Alternative Registry, signs the ONE® ID agreement, and identifies the alternative registry LRA.	President of Health Regulated College or Dean of Healthcare Faculty
Individual	Person or applicant who requires a ONE® ID registration whose identity has been validated by the approved Alternative Registry. Once the individual is registered, he/she is referred to as the registrant .	Members of healthcare faculty
Alternative Registry LRA	Person who is responsible for the ONE® ID processes within the organization.	Registrar of the Alternative Registry

3.0 Registration Overview

The following sections provide an overview of the registration framework:

- **Infrastructure of Trust** – the foundation that permits this model to build a network of trust
- **Registration** – the process of verifying the identity of applicants and proving that they are who they claim to be
- **Sponsorship and Service Enrolment** – sponsorship is the nomination of applicants by an authorized source for access to one or more services, and service enrolment is the process of providing Registrants with access to services

Alternative Registry LRA(s) will ensure individuals are registered into the ONE® ID system to prepare them for enrolment into ehealth service(s) after they receive sponsorship from a Health Service Provider (HSP).

3.1 Infrastructure of Trust

Trust is a cornerstone in the effective delivery of healthcare services, and that includes the electronic delivery of PHI. While trust can be established within care teams through professional or personal relationships, ONE® ID is intended to help establish trust on a provincial scale.

ONE® ID relies on known, trained, and **trusted** individuals within each organization to verify the identity of each individual user as well as their authorization to access eHealth Ontario services. This is known as the **infrastructure of trust**.

For this model to work, there are a few basic questions that must be answered for each applicant:

- Who are you?
- Who provided you sponsorship and what organization do they represent?
- How can you prove your identity?

An Alternative Registry may vouch for the members of their registry using processes and systems that has been reviewed and approved by eHealth Ontario as being comparable and equivalent to those used by the Agency. eHealth Ontario may use securely shared information from the Alternative Registry to issue ONE® ID credentials (i.e. username and password) to the members that have been validated by the registrar of the Alternative Registry.

3.1.1 Building Trust

Trust must be established from the top-down for this model to be effective, as follows:

- eHealth Ontario must assess the organization's policies, processes and systems used to validate the identity of individuals.
- Once assessed, the Alternative Registry must be approved to allow for the exchange of information with eHealth Ontario.

- Members of the Alternative Registry will be registered into ONE® ID and can be sponsored for ehealth services by HSPs or HICs that are authorized to be a sponsoring organization.
- To activate Registrants' credentials in the ONE® ID system, eHealth Ontario will require individuals to agree to *ONE® ID Acceptable Use Policy* as part of the registration process.

3.2 Registration

Individual registration is the first step in the alternative registry process. Registration is the process of validating the identity of an individual and recording their identity information in the ONE® ID system.

All applicants must undergo some level of identity check. This is known as **identity assurance**, and it assures that you are doing more than just taking someone's word for his/her identity. This identity assurance is completed by the Alternative Registry.

At present, most Registrants of a system or service that accesses PHI are required to meet Assurance Level Two (AL2); Alternative Registry LRAs are also required to meet AL2, which is required for the role.

The ONE® ID system will accept Registrants at AL2 from an Alternative Registry that is approved by eHealth Ontario for use in validating identity. Your registry is accountable for ensuring that Registrants' identity information is accurate and valid during registration.

The required identity validation is as follows:

- The individual must have their identity validated by the registrar of the Alternative Registry;
- The individual's core identity information must be recorded and uniquely identified in the Alternative Registry;
- The individual must have provided consent to the Alternative Registry to share their personal information (PI) with eHealth Ontario for the purpose of registration into ONE® ID system;
- The Alternative Registry LRA must provide eHealth Ontario with an encrypted list of individuals who have been validated by their registry for the creation of a ONE® ID account;
- Each individual must activate their ONE® ID account by agreeing to the *ONE® Acceptable Use Policy* and setting their secure password.

3.2.1 Registration Record

Once an individual has been registered with eHealth Ontario, a **registration record** is created. A **registration record** is the information used to uniquely identify an individual, such as:

- Legal names (first and last)
- Preferred names (e.g. "Bob" rather than "Robert")
- Date of birth

- Gender
- Email address
- Unique Identification Number – this ties the Registrant’s identity to the Alternative Registry that completed the identity validation
- Professional License Number (if applicable)

3.3 Sponsorship and Service Enrolment

Sponsorship is the means by which an organization that has entered into an agreement with eHealth Ontario for the provision of services, products or technologies, identifies authorized individuals. This is generally a HIC or HSP.

Service Enrolment is the provision of specific access to a service granted to a Registrant registered in ONE® ID by his/her sponsor. A Registrant may have several service enrolments.

The Alternative Registry LRA will only be responsible for registering individuals and may not be responsible for sponsorship and service enrolments. The Registration process enables individual identity information to be validated for the purpose of getting a ONE® ID account.

An authorized sponsoring organization will be responsible for the sponsorship and service enrolments process when a Registrant is associated with a HSP. For example, individuals registered with ONE® ID via alternative registry may be sponsored by a Family Health Team (FHT) to be enrolled for ONE® Mail or by a Hospital to be enrolled for the Ontario Laboratories Information System (OLIS).

4.0 The Role of the Alternative Registry LRA

The Alternative Registry LRA is a role assumed by individuals who have been nominated by their organization and approved by eHealth Ontario to perform registrations for individuals in ONE® ID.

4.1 Duties and Responsibilities

You are responsible for registering individuals into ONE® ID. The Alternative Registry LRA is also responsible for the following:

- Adhering to all compliance and auditing requirements established by your organization, and eHealth Ontario;
- Adhering to and communicating practices outlined in this guide regarding information collection, storage, retention, and incident management to individuals within the Alternative Registry (see *Section 5.0 Information Collection and Change Management*);
- Being accountable for transactions performed as an Alternative Registry LRA.
- Validating that the identity information sent to eHealth Ontario for ONE® ID credential issuance is from the approved Alternative Registry;
- Creating “@ONEID.ON.CA” accounts for applicants, where applicable;
- Liaising with eHealth Ontario on registration issues;
- Responding to eHealth Ontario requests for assistance in validating the identity of applicants.

4.2 Support

For support, please contact eHealth Ontario Service Desk at 1-866-250-1554 from Monday to Friday during the hours of 8:00 a.m. to 5:00 p.m.

Refer Registrants to the *ONE® ID Registrant Reference Guide* for online self-management of their ONE® ID account. Registrants can also contact eHealth Ontario Service Desk for further assistance.

5.0 Information and Change Management

As the Alternative Registry LRA you are responsible for:

- Communicating information collection and change management from the Alternative Registry to ONE® ID.
- Establishing and communicating the guidelines that are unique to your organization, and within your domain.
- Managing and accounting for the transactions performed within your organization.

5.1 Information Management

As an Alternative Registry LRA, you are responsible for communicating the information management practices outlined in this guide to registered individuals who have been validated by your organization's registry. Components of information management include:

- Information collection
- Information storage and retention

These practices are necessary to safeguard the privacy of PI (including PHI) that is collected, transmitted, stored, or exchanged by and through the information infrastructure, by taking all reasonable steps necessary to ensure the privacy and security of that information.

5.1.1 Information Collection

As the Alternative Registry LRA, you are responsible for adhering to and communicating the practices outlined in this guide for information collection to applicants registered with your organization's Alternative Registry.

You may not be required to collect additional information from individuals for registration into ONE® ID.

The Alternative Registry LRA will securely transmit the identity information from the registry to eHealth Ontario for the purpose of registering Registrants into the ONE® ID system. Individuals must agree to the *ONE® Notice of Collection* for the collection, use, and disclosure of personal information, and to the *ONE® ID Acceptable Use Policy* during the account activation process.

If you have any questions or require further information about the *ONE® ID Notice of Collection* described above, please contact the eHealth Ontario Chief Privacy Officer at:

P.O. Box 148
777 Bay Street, Suite 701
Toronto, ON M5G 2C8
Tel: (416) 586-6500

5.1.2 Information Storage and Retention

If PI is recorded outside of the ONE® ID system as part of your organization's internal registration process, any documentation must be stored in a secure location, such as a locked file cabinet, until the information has been entered into the ONE® ID system. Any documents

should be handled in accordance with the organization's document management and privacy, security policy.

5.2 Consent

Since the Alternative Registry process requires identity information from your registry, you must ensure that you have acquired consent from the individuals within your registry to disclose their identity information to eHealth Ontario for the purposes of registering into the ONE® ID system.

In addition, Registrants must agree to the *ONE® ID Notice of Collection* during the ONE® ID account activation process for the additional information captured in ONE® ID and for processing future enrolments to their ONE® ID account. If the individual does not agree with the collection, eHealth Ontario will not register them into the ONE® ID system.

Registrants must also agree to *ONE® ID Acceptable Use Policy* as a condition of being registered for ONE® ID.

As the Alternative Registry LRA, you will be responsible for the following within your organization:

- Communicating how the registration processes will work for the Registrants
- Ensuring all Registrants understand the *ONE® ID Acceptable Use Policy* and *ONE® ID Notice of Collection* changes to the Alternative Registry

As an Alternative Registry LRA, you are responsible to ensure that eHealth Ontario is notified of any changes made to the Alternative Registry for individuals who have been registered into ONE® ID.

You are responsible for supporting individuals registered in ONE® ID. You will share core identity information of potential Registrants with eHealth Ontario, and Registrants will provide additional information for security and support purposes (see section *6.2 Information Requirements*).

It is also your responsible to notify eHealth Ontario of any changes to the Registrants' identity information in your registry, such as their legal name, gender, or date of birth.

As an Alternative Registry LRA, you are also responsible to notify eHealth Ontario of any errors or issues in identity information from the Alternative Registry, such as the identity is suspected to be incorrect or fraudulent. eHealth Ontario will suspend the Registrant's ONE® ID account until the issue has been investigated and resolved. The ONE® ID account will only be reinstated if you have confirmed that the Alternative Registry has the correct information for the Registrant and that their identity has been validated. Otherwise, the ONE® ID account will be revoked if the identity cannot be validated.

6.0 Registering an Individual in ONE ID

This section describes the standard process to register an individual for ONE® ID with eHealth Ontario. As the Alternative Registry LRA, you are responsible to provide identity information of individuals who are eligible for a ONE® ID account. You will also confirm that the individuals have provided consent for sharing their data with eHealth Ontario. You will securely transmit registrant information to eHealth Ontario and facilitate the ONE® ID Registration process for potential Registrants.

Each individual will have to participate in the activation of their ONE® ID account and create their credentials (username and password). This is accomplished after the Registrant has read and agreed to the ONE® ID Acceptable Use Policy and ONE® ID Notice of Collection online.

Note: Transmission of any PI from the Alternative Registry to eHealth Ontario must be sent via eHealth Ontario's ONE® Mail service or via encrypted file.

6.1 Registrant's Responsibilities

The Registrant is responsible for the following:

- Directly participating in the ONE® ID Registration process;
- Protecting and never sharing his/her eHealth Ontario ONE® ID Login credentials (such as username and password);
- Notifying the eHealth Ontario or the Alternative Registry LRA of any potential compromise to the ONE® ID Login credentials in a timely manner;
- Agreeing to the ONE® ID Acceptable Use Policy as a condition of being registered for ONE® ID;
- Consenting to the ONE® ID Notice of Collection.

6.2 Information Requirements

The Registration process requires the collection of key information from the Alternative Registry and the Registrant. You are responsible for the security and accuracy of the information provided to eHealth Ontario from the Alternative Registry.

6.2.1 Core Identity Information

Individuals are uniquely identified in ONE® ID by their **Core Identity Information**. This information includes the individual's **Legal Name**, **Gender**, and **Date of Birth**. Since identity validation is completed by the Alternative Registry, a **unique identifier** that connects the Registrant to the Alternative Registry is also a piece of Core Identity Information.

6.2.2 Other Applicant Information

Registrants are also required to provide additional information about themselves for security and support purposes. This information includes their contact **Phone Number**, contact **Email**, and **Professional Designation(s)** (if applicable).

Contact information may be used by eHealth Ontario to alert users with respect to changes to their account, help resolve technical issues with the account, and/or in the event that the account is involved in a suspected security breach.

6.2.3 Challenge Questions

As part of the registration process, individuals are required to provide several challenge questions. These are questions to which only the individual knows the answer. They are collected for the purposes of verifying an individual's identity, either over the phone or via the internet, to safeguard the integrity of the system.

The first set of two (2) challenge questions are for support purposes and are referred to as the **Service Desk Challenge Questions**. These challenge questions will be asked in order to verify the registrant's identity when they call into the Service Desk (e.g. if they cannot reset their password online, forget their username and password, or require support for their ONE ID account).

The second set of three (3) challenge questions are referred to as the **Online Challenge Questions**, of which a random two (2) are used by the system in order to authenticate a registrant online (e.g. when registrants want to reset their password online, out of province access, or using a different machine than recognized).

6.3 Overview: Registering an Individual

Identity Validation

- The applicant's identity must be validated via an approved Alternative Registry
- As the Alternative Registry LRA, you must authorize individuals from your registry to be registered for ONE® ID.

Record of Applicant Information

- The potential Registrant's core identity information must be entered into ONE® ID (a combination of entering data received from the Alternative Registry and input from the individual directly)
- Information about the identity validation method must also be recorded in ONE® ID at the time of account creation (hence unique identifier is collected from the Alternative Registry)

Credential and Account Completion

- The applicant must set a secure password online upon completing their ONE® ID registration process.

Note: If you encounter any errors during the registration process, contact eHealth Ontario at 1-866-250-1554 for assistance.

7.0 Registrant Support and Maintenance

Registrants are able to complete many account maintenance activities on their own, directly in the ONE® ID system online or by calling the eHealth Ontario Service Desk; however, you are responsible for supporting Registrants within your organization when such methods are not possible.

7.1 Account Self-Management

Common scenarios in which Registrants can manage their own accounts include:

- Password reset and/or Login ID recovery
- Changing Challenge Questions
- Updating contact information

The *ONE® ID Registrant Reference Guide* provides detailed steps for each of these activities.

Note: Registrants can obtain assistance with any of the above activities by calling the eHealth Ontario Service Desk but they may be referred back to their LRA in the event that the Service Desk cannot validate their identity over the phone.

7.2 Suspending / Revoking a Registration

Suspending a registration involves temporarily taking away an individual's access to their ONE® ID account. A suspended registration can be reinstated upon approval. If an individual requires access to services, each sponsored enrolment must be re-validated before reinstating the enrolment(s).

Reasons to Suspend Registration:

- Extended leave (such as maternity leave)
- The registrant's credentials have been compromised
- Any other reason the Sponsor or Alternative Registry LRA deems appropriate

Revoking a registration involves the permanent removal of an individual's registration record and all associated service enrolments. If the individual subsequently requires access to services, he/she will have to re-register and create a new ONE® ID account.

Reasons to Revoke a Registration:

- The registrant is deceased
- The registrant no longer wishes to be an active registrant
- It is determined that the identity information received from the Alternative Registry during registration was misleading, false or fraudulent
- The identity of the registrant has been otherwise compromised (e.g. identity theft)

Who can request that a registration be suspended or revoked?

- The Registrant
- The Alternative Registry LRA
- The Sponsor

Process for suspending or revoking a registration:

1. Alternative Registry LRA must verify authorization for the request from the Sponsor
2. Alternative Registry LRA to send an email request to ONEIDBusinessSupport@ehealthontario.on.ca
3. eHealth Ontario will suspend/revoke the registration in ONE® ID, and send a confirmation email to the Alternative Registry LRA
4. Alternative Registry LRA to relay the confirmation of suspend/revoke to the requestor

If there are issues with the Registrant’s identity record in ONE® ID, the Alternative Registry LRA will immediately notify eHealth Ontario. eHealth Ontario will suspend the Registrant’s account until the issue can be resolved. If the Alternative Registry cannot validate the Registrant’s information or the issue cannot be resolved, then the Registrant’s ONE® ID account and all associated enrolments for sponsored services will be revoked.

eHealth Ontario will only reinstate a ONE® ID registration if the Registrant’s identity record has been resolved and validated by the Alternative Registry, and the Registrant is still authorized for service enrolments by the Sponsoring Organization.

7.3 Changing Registrant’s Identity Information

An Alternative Registry LRA is responsible for ensuring changes to a Registrant’s identity information in the Alternative Registry are reported to and processed in ONE® ID. For any account changes pertaining to a Registrant’s Legal Name, Gender or Date of Birth, the Alternative Registry LRA must ensure that the changes have been validated by the Registrar and to send a change request to eHealth Ontario to update ONE® ID.

Reasons to change a Registrant’s identity information:

- Registrant’s Legal Name, Gender or Date of Birth was entered incorrectly in the registration system
- Registrant’s information has been legally changed

Who can request a change in identity information?

- The Alternative Registry LRA
- The Registrant

Process:

1. Alternative Registry LRA must confirm the change in the Alternative Registry (i.e. it has been validated with proof).
2. Alternative Registry LRA to send request to ONEIDBusinessSupport@ehealthontario.on.ca with details of change, including type of change and what method of proof was used via encrypted email.
3. eHealth Ontario will update the Registrant’s record in ONE® ID system.

Note: Since a Registrant's ONE® ID Login ID is based on their Preferred Name entered in the ONE® ID system during the registration process, the following must be considered when submitting a Name Change Request:

- As the Alternative Registry LRA, you must communicate to the Registrant the impact of name change and the options they have for their ONE® ID Login ID.
- The registrant has the option to retain their old Login ID; this must be communicated to eHealth Ontario in the request submitted.
- If a registrant goes through a legal name change and retains their current preferred name, then there will not be an impact on their Login ID. If they would like their new legal name to be reflected in the Login ID, then they must also change their preferred name.
- If a Registrant would like to change their preferred name, then their ONE® ID Login ID will be impacted and they must indicate if previous Login ID must be retained or they would like their new name to be reflected in the Login ID.

7.4 Changing a Registrant's Support Challenge Questions

Reasons to change a Registrant's Service Desk Challenge Questions:

- A Registrant is unable to answer his/her Service Desk Challenge Questions when he/she calls eHealth Ontario for support AND Registrant is unable to update those questions using the self-management tool in ONE® ID (<https://oneid.ehealthontario.ca/login>).

Who can request a change to a Registrant's Service Desk Challenge Questions?

- The Registrant will make the request with the Alternative Registry LRA. The Alternative Registry LRA will send request to ONEIDBusinessDelivery@ehealthontario.on.ca.

Process:

1. Alternative Registry LRA must confirm the Registrant's identity against the Alternative Registry
2. Alternative Registry LRA to send request to eHealth Ontario with Registrant's ONE® ID login ID and the two (2) new Service Desk Challenge Questions to be updated
3. eHealth Ontario will process the change in the ONE® ID system
4. eHealth Ontario inform the Alternative Registry LRA and Registrant that the change has been completed

8.0 Compliance and Assurance

eHealth Ontario delegates the responsibilities for identity validation, and registration to the Alternative Registry LRAs, who are responsible to adhere to the practices outlined in this manual. As the Alternative Registry LRA, eHealth Ontario may request that you assure that you are complying with these practices.

Upon request, the Alternative Registry LRA should be prepared to confirm the names of all authorized Registrants within the Alternative Registry.

8.1 Monitoring the Activities of Alternative Registry LRAs

As an Alternative Registry LRA, you are responsible to account for your activities within your organization and ensuring you are in compliance with the *Alternative Registry LRA Procedures Manual*.

8.1.1 Auditing of Alternative Registry LRAs

The Alternative Registry LRA must support auditability by identifying the following:

- Registration and identity management policies, practices and systems of the Alternative Registry that are used to validate identity
- Unique identifier assigned to each individual
- Information shared by the Alternative Registry for ONE® ID registration

8.1.2 Verifying Registration

The Alternative Registry LRA is responsible for the following:

- Providing all information necessary to register members of the Alternative Registry with eHealth Ontario; and
- Performing due diligence on the registration information provided by Registrants.

eHealth Ontario may ask your assistance to confirm the identity of existing Registrants in response to any of the following scenarios:

- A security incident
- An apparent duplicate account
- Any account information that appears to be incorrect