

OntarioMD HRM Privacy Impact Assessment Executive Summary

PIA Overview

This Privacy Impact Assessment (PIA) has been developed to meet the following objectives:

- To identify privacy risks and to recommend strategies to manage those risks.
- To demonstrate to stakeholders that the proper due diligence with respect to privacy has been conducted by OntarioMD on its Health Report Manager (HRM) solution.

PIA Methodology and Team

OntarioMD has developed this PIA in conformance with generally recognized best practices for Privacy Impact Assessment. To assist with the research and analysis, OntarioMD contracted with Privacy Horizon to provide skilled resources in privacy, security and risk management.

The PIA methodology has been adapted from ISO/IEC 29134: Information technology – Security techniques – Guidelines for privacy impact assessment.

The OntarioMD HRM PIA was prepared under the leadership of Patrick Lo, CIPP/C (consultant, Privacy Horizon) with input from the Technology and Legal/Privacy teams at OntarioMD.

System Overview

HRM is an application managed by OntarioMD that enables hospitals to electronically send patient reports directly to clinicians' Electronic Medical Record (EMR) systems. This process facilitates quicker follow-up care by improving the continuity of patient care, allowing clinicians to access reports sooner. HRM integrates text-based Medical Record (MR) and Diagnostic Imaging (DI) reports into the patient's EMR, eliminating the need for scanning paper documents. This integration provides a more comprehensive view of patient health and helps identify trends that may need intervention.

HRM enhances continuity of patient care by promptly delivering electronic reports to clinicians' EMRs, eliminating the need to scan paper reports. This enables quicker follow-up with patients and provides a comprehensive view of their health, helping identify trends that may require intervention.

PIA scope

The scope of the PIA analysis includes the following:

- Personal health information¹ that processed, stored, and transmitted via HRM. Where PHI is only processed, retained and transmitted from Production, this PIA has limited its scope to the production environment.
- OntarioMD organizational privacy and security safeguards, where OntarioMD personnel may have access to PHI when providing technical support for HRM.
- Privacy legislations within Ontario, Canada, as they apply.

Key Findings

The privacy risk analysis considered six scenarios relating to HRM. No “High” or “Very High” risks were found. One scenario is assessed as “Medium” risk, and five scenarios are assessed as “Low” and “Very Low” risk:

- A medium-risk level for Disclosure or attack by internal or external malicious agent.
- A low-risk level for Unauthorized use or disclosure by internal agent (non-malicious)
- A very low-risk level for Improper disposal of media
- A very low-risk level for Accidental corruption of PHI
- A low-risk level for Non-compliance with legislation
- A low-risk level for Denial of Patient Rights

The OntarioMD HRM team has expressed a commitment to close the identified risks in a reasonable time frame. OntarioMD safeguards personal health information (PHI) through a combination of administrative and technical measures, along with physical protections from an outsourced hosting facility. They have established agreements with the hosting service provider and third-party components for processing PHI, defining roles and responsibilities under the Personal Health Information Protection Act (PHIPA). Access to PHI will be strictly incidental in order to provide support services, and all OntarioMD staff are required to sign confidentiality agreements and undergo annual training on privacy and security. All staff are required to report incidents through OntarioMD’s internal process for reporting and managing privacy incidents, which are reviewed by the Privacy Officer.

¹ Includes PHI on all reports that may be sent via HRM, including electronic admission discharge or transfer messages, specialist consultations, results of tests and procedures, standard e-forms required by Ontario’s Highway Traffic Act (HTA), prescriptions, vaccination reports, advisory for additional referrals, considerations for recovery and other documentation.