Privacy Impact Assessment Summary

Ontario Laboratories Information System (OLIS)
Full Production Release (FPR)
Phase 1

Date: November 28, 2014

Version: 1.1

Introduction

As required by the *Personal Health Information Protection Act*, 2004 ("PHIPA") and O. Reg. 329/04[1], eCHN completed a Privacy Impact Assessment ("PIA") for an integration project between eHealth Ontario and eCHN which allowed access to Ontario Laboratories data to eCHN users via the WebChart application. Integration activities were completed in winter 2014.

The following PIA Summary provides a brief overview of the eCHN integration with the Ontario Laboratories Information System (OLIS). The Summary also outlines the general findings from the assessment and the plan of eCHN risk treatment activities.

Background

eCHN operates as a not-for-profit, government funded organization dedicated to providing electronic solutions that enable the secure sharing of personal health information[2] ("PHI") between authorized health care providers. The eCHN production system assembles millions of records from paediatric patient interactions within the healthcare system in Ontario, for use in the delivery of clinical care.

eCHN receives paediatric data (from birth up to the nineteenth birthday), from contributing client and assembles the data in the form of a single electronic health record. eCHN's electronic health record consists of key areas of information such as: admission, discharge and transfer data; lab reports; clinic notes; medication administration reports; consultant's letters and surgical notes; diagnostic images and reports. Patient information received from contributing hospitals is available to authorized users through the eCHN WebChart application. WebChart is eCHN's clinical viewer, which provides access to the electronic health record (EHR). WebChart is used to facilitate the sharing of paediatric patient data between health information custodian[3] contributors and authorized health information custodian[4] users.

OLIS is a program of the MOHLTC that is operated by eHealth Ontario which gathers patients' laboratory data from hospitals, public and community laboratories for viewing by authorized health care practitioners. The OLIS repository contains highly sensitive PHI such as physician ordered tests for patients, as well as the results of those tests.

In 2011, eCHN undertook a project in collaboration with eHealth Ontario and the Ministry of Health and Long Term Care whereby paediatric patient laboratory data from OLIS was made available to 21 health care provider users of the eCHN Portal. The release of OLIS to the 21 health care providers was a limited

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[1] O. Reg. 329/04 section 6(3)(5)ii
[2] PHIPA section 4(1)
[3] PHIPA section 3(1) 1-4
[4] Ibid.

production release (LPR) and conducted to assess the benefits of OLIS data accessibility in eCHN, while identifying any issues which may be encountered in a full roll-out of OLIS.

After the success of the LPR, eHealth Ontario and eCHN agreed to make lab results stored in the OLIS repository (i.e., for the paediatric patients who have a pre-existing record available in eCHN) available to other eCHN Portal users. This new initiative, or full production release (FPR) of OLIS will be launched in 3 different phases. Phase 1 will involve enabling access to OLIS lab results to specified providers within organizations (such as hospitals and CCACs) that are currently under contract with eHealth Ontario for the consumption of OLIS data. Phase 2 will involve enabling access to OLIS lab results to specific providers in community practices that have entered into contract with eHealth Ontario for access to OLIS. Finally, Phase 3 will involve enabling access to OLIS lab results to administrative staff that work under the authority of a health information custodian that has entered into contract with eHealth Ontario.

Summary of the Privacy Impact Assessment for OLIS FPR Phase 1

The November 28th, 2014 OLIS FPR PIA for Phase 1 of the integration included a review of the data flows, user registration for access to OLIS data, changes to the eCHN and eHealth Ontario compliance framework and the functionality of the WebChart application and OLIS related queries. The PIA confirmed that eCHN operates as a sub-agent of the Ministry of Health and Long-Term Care for the OLIS integration and access activities, in addition to its services for WebChart which are provided as a PHIPA Agent and a Health Information Network Provider, for health information custodian clients.

Four privacy risks were identified in the assessment with regards to notification to users and the public of access to OLIS, changes to default facilities and assurances around third party vendors. All recommendations from the November 28, 2014 OLIS FPR PIA have been implemented.

eCHN Privacy & Security Office Contact

If you have any additional questions about the November 28th, 2014 OLIS FPR PIA for Phase 1, please contact the eCHN Privacy & Security Office at privacy@echn.ca or 416-813-7998.