



electronic
CHILD HEALTH NETWORK

Privacy Impact Assessment Summary

WebChart and e-Referral

Date: July 22, 2014

Version: 1.3



Introduction

As required by the *Personal Health Information Protection Act, 2004* (“PHIPA”) and O. Reg. 329/04¹, eCHN completed a Privacy Impact Assessment (“PIA”) for its WebChart and e-Referral service in May 2007. Minor updates were made to the 2007 PIA, with a fulsome refresh being conducted in July 2014.

The following PIA Summary provides a brief overview of the eCHN WebChart and e-Referral services provided by eCHN, along with the general findings from the assessment and the commitment to ensuring remediation activities are undertaken by eCHN.

Background

eCHN is a not-for-profit, government funded organization dedicated to providing electronic solutions that enable the secure sharing of personal health information² (“PHI”) between authorized health care providers. The eCHN production system assembles millions of records from 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 member organizations 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 custodian³ contributors and authorized health information custodian⁴ users.

eCHN also provides users of WebChart with access to an e-Referral service. e-Referral services allow authorized eCHN users to refer a patient along with the patients’ health information to another eCHN member organization that the patient is being referred to. Currently e-Referral operates to allow the transmission of patient referrals from a user to the Hospital for Sick Children, Toronto.

Health information custodians that are not eCHN WebChart users can also register for the access and use of the e-Referral service. e-Referral only users do not have access to the WebChart application, or the PHI posted in the paediatric EHR, but may upload patient data (i.e. medical reports and other referral documents) from their internal systems into the e-Referral application. The uploaded data and

¹ O. Reg. 329/04 section 6(3)(5)ii

² PHIPA section 4(1)

³ PHIPA section 3(1) 1-4

⁴ Ibid.



the referral are securely transferred to the referred health information custodian (i.e. Hospital for Sick Children).

Summary of the Privacy Impact Assessment for WebChart and e-Referral

The July 2014 PIA included a review of the eCHN Portal WebChart & e-Referral applications, along with the compliance management tools (Audit Reporter and Consent Management tools) available through the eCHN Portal.

The PIA confirmed the finding from the previous legislative analyses which determined that eCHN services for WebChart and e-Referral are provided as a PHIPA Agent and a Health Information Network Provider, for health information custodian clients.

Seven privacy risks were identified in the assessment that would allow eCHN to standardize agreements for user onboarding, to align its contacts with other Ontario portals that manage patient data and to re-evaluate its data retention protocols.

In response to the seven recommendations eCHN:

- developed a risk treatment plan to address recommendations;
- developed client agreements that align with other Ontario e-Health portals;
- created new protocols for user onboarding; and
- aligned its practices with data retention policies.

All recommendations identified in the July 2014 WebChart & e-Referral PIA are expected to be implemented by spring 2017. eCHN will manage the ongoing status and tracking of risks through a risk treatment plan.

eCHN Privacy & Security Office Contact

If you have any additional questions about the WebChart and e-Referral PIA, please contact the eCHN Privacy & Security Office at privacy@echn.ca or 416-813-7998.