

# Privacy Impact Assessment Summary

*Date Originally Written: 21 July 2011*

*Date Reviewed & Updated: 15 September 2014*

## Privacy Impact Assessment – High Risk Services

A Privacy Impact Assessment (PIA) is a risk management tool that allows the Ontario Telemedicine Network (OTN) in its role as a Health Information Network Provider under the *'Personal Health Information Protections Act, 2004'*<sup>1</sup> to assess a technology, program or information system's privacy risks and its compliance with provincial and federal legislative requirements and standards. Where required, a PIA also details mitigating strategies by way of recommendations and an action plan. A critical element of the PIA process is the implementation of those recommendations detailed in the assessment.

A PIA has the benefit of generating and communicating confidence that privacy requirements have, or are being, met and risks mitigated. A PIA is meant to be used and expanded over the cycle of the initiative's development and implementation. PIA's are refreshed over time to continuously identify and address risks that have the potential to impact the confidentiality, integrity and accessibility of personal health information held/handled by OTN and/or its partners. OTN has adopted a risk tolerance level of low, meaning that low and very low risks will not be immediately actioned, but will be monitored to ensure that they stay within tolerable levels. All high and medium risks are mitigated.

Contact centres are becoming the primary interface between business and service delivery organizations and their customers. OTN completed a PIA on its Call Centre Technologies in July 2010. The following is a summary of the PIA findings, including a brief background on OTN's Call Centre Services, risks, risk mitigation recommendations, and contact information.

## Background

Ontario Telemedicine Network (OTN) provides five types of high-risk telemedicine services. Using a combination of OTN technology and equipment, along with services provided by host sites and CitiCall referral services, OTN delivers these five programs to participating health care providers throughout the province.

The core OTN technologies utilized in delivery of these programs is videoconferencing and eFilm technology, which allows for the sharing of diagnostic images between referring physicians and consulting specialists, and facilitates video consultations between patients and providers. This PIA reviewed the strength of privacy controls in deploying the relevant OTN technology involved in sharing patient health information between health care providers in the course of using the following five OTN services:

- Telestroke;
- Teleburn;
- Tele-trauma;
- Virtual ICU (or Virtual Critical Care); and

- Emergency Care Services (Long-Term Care).

## Key Findings/Risks & Recommendations

The PIA identified some privacy controls that should be enhanced to support the program. OTN has already closed all of the recommendations.

The PIA makes the following recommendations:

#	RATING	FINDING/RISK	RECOMMENDATION	STATUS
1	Medium	Equipment volume control	Develop videoconferencing (VC) guideline which emphasizes checking and confirming minimum volume level required prior to communication of any PHI	Complete
2/3	Medium	Interruption/unauthorized viewing of VC session/unauthorized filming of individuals not involved in VC	Develop VC guideline to address appropriate location of patient and camera positioning to ensure confidentiality	Complete
4	Medium/High	Lack of user awareness	Develop and deliver regular e-training modules to reinforce guidelines	Complete Best Practice Fact Sheet in place
5	Medium/High	Lack of sufficient user agreement	Implement user agreement for all users who will have access to eFilm technology	Complete
6	Medium/High	Lack of encryption of eFilm images	Encryption of eFilm images/equipment used to store images, particularly on at-home workstations	Complete
7	Medium/High	Lack of access	Effective access logs	Accept as not

Source: 1 Ontario Ministry of Health and Long-term Care. "Health Information Protection Act, 2004."  
[http://www.health.gov.on.ca/english/providers/legislation/priv\\_legislation/priv\\_legislation.html](http://www.health.gov.on.ca/english/providers/legislation/priv_legislation/priv_legislation.html).

#	RATING	FINDING/RISK	RECOMMENDATION	STATUS
		logging/monitoring	should be maintained, monitored, or audited	possible for technical reasons
8	High	Insecure password & no authentication	E-Film users should be provided with a personal password and authentication should be implemented at the eFilm application level. Formalized identity and access management policies and procedures should be developed and implemented. Consideration should be given to imposing technical access restrictions to diagnostic images (wild card searches of all hospitals rendered impossible).	Accept Introduced LDAP login everyone will have their own user name and password
9	Medium-High	Lack of access logging/monitoring	Effective access logs should be maintained, monitored, or audited	Accept
10	Medium-High	Personal use of OTN equipment/internet access	In addition to user agreements, OTN should implement technical controls to restrict /limit personal or unauthorized use of equipment and internet access	Complete
11	Medium	USB/CD/DVD Drive functionality	Disable USB/CD/DVD drives on OTN equipment	Complete

Source: 1 Ontario Ministry of Health and Long-term Care. "Health Information Protection Act, 2004."  
[http://www.health.gov.on.ca/english/providers/legislation/priv\\_legislation/priv\\_legislation.html](http://www.health.gov.on.ca/english/providers/legislation/priv_legislation/priv_legislation.html).

#	RATING	FINDING/RISK	RECOMMENDATION	STATUS
		enabled	(*Note: OTN has elected to encrypt these drives to mitigate this risk)	
12	Medium-Low	Inadequate CT Image management policy	OTN should continue practice of purging CT images from workstations and revise policy to reflect this practice	Accept

Please contact the OTN Privacy Office should you have any questions:

OTN Privacy Office - Ontario Telemedicine Network  
 105 Moatfield Drive, Suite 1100, Toronto, ON M3B 0A2  
 Email: [privacy@otn.ca](mailto:privacy@otn.ca) | Tel: 416-446-4110