Personal Computer Video Conferencing (PCVC)
Privacy Impact Assessment & Refresh Summary

Date Originally Written: October 2017
Date Reviewed & Updated: March 2018

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'*[1], to assess a technology, program or information system's privacy risks and its compliance with provincial and/or 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 reasonable privacy safeguards are in place, obligations are being met and risks mitigated. It can also promote fully informed policy decision-making and system design choices, ensuring privacy is considered throughout the business design/project development cycle. A Privacy Impact Assessment is a snapshot in time and is meant to be used and expanded over the cycle of the initiative's development and implementation, to continuously identify and address risks that impact or have the potential to impact the confidentiality, integrity and accessibility of personal health information held/handled by OTN and/or its partners.

Background

Personal Computer Video Conferencing (PCVC)

OTN first completed a PIA on PCVC in October 2011. Ontario Telemedicine Network (OTN) was then extending the reach of telemedicine by making it possible for physicians to access videoconferencing from their personal computers through the PCVC project. PCVC enhanced access and quality of health care in Ontario and realized OTN's vision to make telemedicine a mainstream channel for health care delivery and education. It allows users to participate in administrative, educational and clinical events from a desktop PC or laptop using a USB web camera, broadband internet connectivity and a new software application called "Vidyo."

Wireless LAN and 4G Access, and Use of Mobile Devices with OTN's Personal Videoconferencing Service

OTN completed a PIA on its *Wireless LAN and 4G Access and Use of Mobile Devices with OTN's Personal Videoconferencing Service Telemedicine Centre* on August 23, 2012.

---

[1] 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

Personal Videoconferencing Service (PCVC) Guest Link – now referred to as OTNInvite

OTN completed a PIA on its PCVC Guest Link service dated September 11, 2013. OTN's Personal Videoconferencing service (PCVC) expanded access to Telemedicine services by creating additional opportunities for participants using commonly available tools and technology.

Guest Link allowed a personal videoconferencing user to invite a guest to join a videoconference telemedicine event, even though the guest is not provisioned with or a member of OTN's personal videoconferencing service. OTN uses Guest Link to support a number of new initiatives including clinician to patient consultations, collaboration between clinicians, planning and administrative meetings, and educational events where a guest speaker would participate via a Guest Link.

OTN's Personal Videoconferencing Service Platform Migration

OTN completed a PIA on OTN's Personal Videoconferencing Service Application's Platform Migration dated June 2015.

When OTN first launched its Personal Computer Videoconferencing Service in 2011 it completed both a PIA and Threat and Risk Assessment (TRA). The service then offered health care providers the ability to access the videoconference functionality on a mobile device, such as an iPhone or Blackberry, with a wireless or 4G connection. End users would be able communicate with other PCVC users on mobile devices through point-to-point or multi-point calls. OTN contracted a Third Party to conduct a delta Privacy Impact Assessment (PIA) on the expansion of the PCVC service to mobile devices (August 2012).

In the fall of 2013, OTN expanded access to its PCVC service via mobile devices to additional users, including guests and patients. Such expansion facilitated communications among providers through the use of a "Guest link," and between providers and patients as part of a pilot project. This expansion also included facilitating communications between Emergency Departments and remote consulting health providers using PCVC via mobile devices as a pilot for High Risk Telemedicine Services. Again OTN contracted a Third Party to conduct a delta Privacy Impact Assessment (PIA) on the expansion of the PCVC service to "Guest Link" (September 2013).

For all uses of PCVC, Personal Health Information (PHI) - in video and audio format - flows to and from users through their mobile devices. PHI is not stored or retained on the mobile devices.

Additionally, OTN completed a delta Privacy Impact Assessment (PIA) on the expansion of the PCVC service to evaluate the platform migration. As such, the current analysis is confined in scope to the accountabilities, agreements, processes, and technical safeguards intended to support the migration of the existing platform.

iOS and Android

OTN completed a conceptual Privacy Impact Assessment (PIA) on *iOS and Android* dated January 2016 to inform future Android App development at OTN.

OTN developed a Personal Videoconferencing (PCVC) iOS Application for iPad and iPhone mobile devices called "OTNconnect" available for download through the Apple App Store. PCVC leveraged *Vidyo, Inc.'s* technology to enable functionality for the App. You must already have been provisioned with an OTNhub Account in order to be able to use OTNconnect. Having an OTNhub Account, affords you access to Telemedicine services such as virtual videoconferencing designed to support enhanced delivery of health care and/or education.

OTN's first entry into mobile platform support came in the form of an iOS pilot in Q3 of 2014/15. The iOS pilot had proof-of-concept functionality, supporting login to OTNhub through both OTN and ONE ID credentials, allowing users to receive calls from anyone in the OTN network and make calls to users and systems on their favorites list. OTN plans to expand the functionality of OTNconnect supported by iOS in future; and expand the offering to Android Operating Systems.

PCVC & OTNInvite Refresh + Delegate & Clinical Multipoint Feature

OTN completed a PIA refresh on PCVC and PIA on its OTNInvite delegate and clinical multipoint features. in July and August 2017. OTN commissioned an independent Privacy Impact Assessment (PIA) as part of its ongoing privacy risk management program for the PCVC & OTNInvite releases. The scope of the assessment included a refresh of PCVC and OTNInvite, an assessment of the new Delegate and clinical multipoint features, and integration with other OTNHub components.

Key Findings/ Risks & Recommendations

The PIA and refresh identified some privacy controls that could be enhanced to support the program. OTN has already addressed some of the recommendations and has plans in place to address others in the coming months.

The PIA and refresh make the following recommendations:

#	RECOMMENDATION	OTN RESPONSE
1	Make out-of-band PIN a mandatory requirement to join an OTNInvite session.	Based on member/user feedback OTN has opted to make the PIN optional. Members/users who use OTNInvite for clinical purposes want a PIN to add a layer of privacy to their session. Members/users who do not use OTNInvite for clinical purposes or use it with the same individuals find the use of a PIN cumbersome.
2	Implement an alternative patient communication method to sending email invites.	OTNInvite system generated emails although not encrypted have been customized to not contain any PHI. The video/link is encrypted.

#	RECOMMENDATION	OTN RESPONSE
3	Provide HSPs with agreement describing procedures for using PCVC OTNInvite, their obligations for meeting privacy requirements and the risks of using the services. Have OTN members acknowledge awareness of the roles and responsibilities and risks of using OTN services as defined in the document.	OTN has Terms of Service and a User Agreement for access to PCVC/OTNInvite and other OTN assets through its OTNhub that detail OTN and member/user privacy roles and responsibilities. There are a number of awareness and best practice documents available to PCVC users.
4	Conduct audits on OTN members to attest they are meeting their obligations for using OTNInvite.	OTN has Terms of Service and a User Agreement for access to PCVC/OTNInvite and other OTN assets through its OTNhub that detail OTN and member/user privacy roles and responsibilities including obligations to report any privacy issues to one another. It would not be feasible for OTN to audit its members/users.
5	Have HSPs implement a process to identify and log PCVC attendees and for HSPs to provide awareness training on identifying phishing emails purportedly coming from OTN.	OTN has awareness and best practice documents/modules available to members and users. Members/Users are trained to do roll call at the onset of a video session. OTN has developed a consumer awareness module that will be available on OTN.ca shortly.
6	Implement a Threat and Privacy Monitoring and Detection system and processes.	OTN has secured a third party managed information security service to supplement its information security program.
7	Develop a standard report format and strategy for conducting PIAs.	OTN has a PIA Policy and Privacy Threshold Assessment Tool. OTN relies mostly on external consultant to conduct PIAs. Each consultant has a unique PIA report format however OTN ensures a consistent methodology. OTN will explore developing its own standard PIA reporting format.
8	Fully document functional and technical details of major and minor PCVC OTNInvite releases.	OTN is in the process of reviewing all of its project/release documentation processes.

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 | Tel: 416-446-4110