

Privacy Impact Assessment Summary

Date Originally Written: 1 June 2012

Date Reviewed & Updated: September 2014

Privacy Impact Assessment – Telehomecare Expansion Project

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 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 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 redesign/project redevelopment cycle. A Privacy Impact Assessment 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. 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.

OTN completed a PIA for this project in March 2012. The following is a summary of the PIA, including a brief background on the Telehomecare Expansion Project, key findings & strategies, and contact information.

Background

The Telehomecare (THC) Expansion Project is an initiative undertaken by the Ontario Telemedicine Network (OTN) to leverage the experience of the Telehomecare Pilot Project into a province-wide network that enables patients and Telehomecare nurses to monitor patient progress remotely using selected medical monitoring devices connected to OTN's network infrastructure.

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.

In 2007, the Ontario Ministry of Health and Long Term Care (MOHLTC) and Canada Health Infoway (CHI) co-funded a Phase One Telehomecare Program for Congestive Heart Failure (CHF) and Chronic Obstructive Pulmonary Disease (COPD) patients. Under the project leadership of the Ontario Telemedicine Network (OTN), eight Family Health Teams in Ontario successfully enrolled 813 patients in the Phase One Program, making it the largest Telehomecare program in Canada.

The purpose of the THC Expansion Project is to develop a provincial Telehomecare program & reference model that improves health outcomes and quality of life for complex chronic disease patients.

Key Findings/Risks & Recommendations

The PIA identified one privacy risk and control that should be enhanced to support the Telehomecare Expansion Project. OTN has plans in place to address this risk in the coming months. The PIA also acknowledged a number of key priority areas that the THC project team has been developing and finalizing that although not flagged as risks were instrumental in fortifying OTN's privacy posture with respect to Telehomecare services.

The PIA noted the following:

#	RATING	FINDING/RISK	RECOMMENDATION	STATUS
1	Medium	Unauthorized Disclosure: There is a possibility of an attack on THC systems by malicious agents	OTN and the THC host organizations must ensure that mechanisms are in place to detect and respond to an incident should it occur. Such mechanisms include pro-active monitoring and audit; rapid response to patient/client reported incidents and complaints; and training staff to report real or suspected incidents.	Complete
			CRITICAL DEPENDENCY	
			Update OTN Privacy Policies to address OTN's expanded role in Telehomecare maintaining and controlling access to databases of PHI on behalf of Health Information Custodians.	
			Define an information governance framework that includes strong representation from the Primary LHIN Organizations who are the Health Information Custodians.	
			Implement a pro-active program of monitoring and audit to detect	

#	RATING	FINDING/RISK	RECOMMENDATION	STATUS
			unauthorized access to PHI, including the acquisition of automated tools to facilitate the process.	
			Ensure that adequate privacy and security requirements are built into the contract with the RMU vendor, and confirm that the RMU vendors has adequate privacy and security safeguards in place prior to go-live.	Complete
			Implement the OTN Identity and Access Management System prior to full production rollout.	In Progress - OTN's corporate automated IAM processes and systems are being designed with a staggered roll-out planned for the Fall. In the meantime, role based access controls in the PMMS software & OTN user registration processes will be leveraged
			Review and update member agreements to address OTN's expanded role in Telehomecare maintaining and controlling access to databases of PHI on behalf of Health Information Custodians.	Complete
			Ensure that appropriate privacy and security training has been provided to end-users of the PMMS.	Complete

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

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