

Privacy Impact Assessment Summary

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Privacy Impact Assessment – Teleophthalmology 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.

In November of 2009, the Ontario Telemedicine Network (OTN) commissioned an assessment of the privacy risks arising from our new Teleophthalmology service offering. The assessment concentrated on the risks that emerge from the digitization and transmission of personal health information (PHI). The following is a summary of the PIA, including a brief background on Teleophthalmology, key findings & strategies, and contact information.

Background

The Teleophthalmology project (TOP) focuses on the provision of vision-related health care at a distance. This new initiative is based on the use of electronic means to store and transmit digitized personal health information, including images, demographic

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.

details, clinician notes, and supporting documentation. The goals of the TOP project are to a) improve access to retinal vision services, b) improve the efficiency of retinal assessment, and c) reduce the burden on patients seeking treatment.

The TOP project uses a ‘store and forward’ model of service delivery. Clinicians at a referring site will upload digital images of a patient’s retina to a central server, managed by OTN. Once loaded into this central repository, a patient’s information can be accessed by vision care specialists via an internet connection. The end result of the process is a diagnosis of the patient’s condition, delivered to the patient by staff members at the referring site.

Key Findings/Risks & Recommendations

The privacy assessment found that the Teleophthalmology project incorporates safeguards that generally facilitate the protection of PHI. However, the authors of the assessment identified some risks that OTN should address in the near future. Among the issues identified are the following:

- **Logging:** The system lacks a comprehensive approach for logging access to information.
- **Lock boxes:** The system does not support a mechanism for implementing lock boxes.
- **Encryption:** Encryption is required, for mobile devices.
- **Guidance:** Users of laptops are not provided with guidance on secure usage.
- **Reporting:** OTN has not defined the reports to be generated from the central database.
- **Cleansing:** Client workstations will contain duplicate image data that needs to be cleansed

As a result of these and other issues, the OTN privacy team has implemented a set of action plans. The following table presents a set of responses to the findings contained in the PIA, together with a target date for their respective implementations:

#	FINDING/RISK	RESPONSE	STATUS
1	OTN should implement logging and auditing, in order to meet its obligations under PHIPA.	OTN is implementing logging and auditing.	Complete
2	The Teleophthalmology service should provide for revocation of consent, as defined in PHIPA.	OTN has provided an ‘all in or all out’ model for pilot project. Should the project continue into operations, OTN will re-evaluate this requirement.	Complete

3	OTN must ensure that OHIP numbers are not used for any further purpose, and reporting data is sanitized of PHI.	OTN's privacy department will monitor reporting and secondary uses.	Complete
4	OTN must deploy strong encryption on any mobile devices used by participants.	OTN's security department has developed, and is implementing, technical requirements for encryption.	Complete
5	Agreements with third party vendors must include sufficient protection for personal health information.	OTN's privacy department will review third party contracts for this purpose.	Complete
6	OTN must implement procedures for facilitating access and correction of PHI by patients.	OTN is developing a procedure for access and correction.	Complete

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

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