



OTN Services and Safeguards

TELEOPHTHALMOLOGY

Description of Services

OTN is an independent, not-for-profit organization funded by the Ontario Ministry of Health and Long-Term Care. Using advanced information communication technologies and electronic medical devices, OTN supports the delivery of clinical care, professional education and health-related administrative services at more than 1,600 urban and rural sites across the province.

OTN is committed to protecting personal health information consistent with the requirements of the '*Personal Health Information Protection Act, 2004*' (PHIPA) and Ontario Regulation 329/04. "Personal Health Information" is any information that can identify an individual and that relates to their health care services received. This includes (but is not limited to) name, address, telephone number, health card number, health care provider's name, the reason one was referred for a telemedicine/teleophthalmology appointment and any examination results.

Teleophthalmology

OTN's Teleophthalmology Program supports retinopathy screening across the province by providing a store forward service for the sharing and storage of ocular images and timely access to specialists for consultations that require visualization of an image. OTN makes available the use of Store Forward technology to allow for data and images to be captured, stored and shared for later use. The referring physician sends patients for retinal screening at a teleophthalmology site. Patients will undergo testing and the data generated is then securely forwarded or "uploaded" to an ophthalmologist for centralized reading of images and to support use cases such as diabetic retinal screening assessment, diagnosis and/or treatment recommendations. The digital images are "stored" on secure servers with restricted access based on role and on a need to know basis.

How The Technology Works

OTN's Teleophthalmology Program uses a secure web-based connection and software that allows referring and consulting healthcare providers to capture and review digital images of the retina. OTN has procured the services of a third-party hosted solution – iVision SCREEN by Retina Labs RD Inc. - a cloud-based, commercial off-the-shelf web based solution designed exclusively for eye care and retinal screening programs. The iVision SCREEN is a standalone and self-contained web application that users will access through a web browser. It integrates ocular imaging, clinical workflows and reporting into a single-source solution.

iVision SCREEN solution is 100% web-based and delivered as a Software as a Service (SaaS) hosted in Ontario by cloud.ca with backup facilities located in Quebec, OTN will continue to act as the primary service provider to individuals and organizations delivering Teleophthalmology, supporting the recruitment and provisioning of new users, and providing change management guidance to promote growth. OTN has agreements in place that requires Retina Labs RD Inc. to comply with PHIPA, Ontario's health privacy law, and its regulations. OTN has assessed the services to ensure compliance with the Act and to mitigate any identified risks.

Privacy and Security

OTN follows industry best practices (e.g. ISO security standards) and legislative requirements (e.g. 'the Personal Health Information Protection Act, 2004' and Ontario Regulation 329/04). The Privacy and Risk, and Networking, Videoconferencing and Security Operations Teams play an active role in building and managing privacy and security within OTN products and services.

OTN and Retina Labs have implemented strong administrative, technical and physical safeguards relating to the confidentiality and security of the information to protect & limit access to the application. The only employees who are granted access to personal and personal health information are those with a business 'Need-to-know' and whose work duties reasonably require such information. Personal health information, including images, is only shared with care providers in a patient's "Circle of Care" as part of the referral process.

The images of the retina are sent over a secure website to an ophthalmologist for review. A report is made to determine if there are potential changes in a patient's eye from diabetic retinopathy and other diseases of the eye. All information resides in the password protected application.

Description of Safeguards

OTN monitors, reviews and updates its practices to ensure the privacy and security of confidential information (Including personal health information and personal information), processed on its systems and transmitted over its network are safe and secure. OTN uses a variety of physical, administrative, and technological safeguards to protect confidential information from unauthorized access, use, copying, modification or disclosure **including contractual agreements** with all of its members.

OTN safeguards include, but are not limited to:

Administrative Safeguards

- Privacy and Security policies and procedures are in place as set out in frameworks. Staff are trained on policy in accordance with PHIPA, Ontario Regulation 329/04 and any other applicable law and regulation.
- Employees sign an Employment Agreement; as well as an annual Confidentiality Agreement, in addition to having to comply with various HR/Privacy/Security Policies outlining User Responsibilities.

- Staff are required to complete mandatory privacy and security training courses upon hire..
- Staff with access to Personal Health Information are required to undergo Criminal Background Checks
- There are designated Privacy and Information Security Personnel to lead the compliance efforts
- Roles & Responsibilities of Members and Participating Organizations are provided in Membership and Terms of Service Agreements
- OTN and Retina Labs Rd Inc. have entered into a contractual agreement to detail the requirements, obligations and compliance to PHIPA.

Technical Safeguards

- All data is transmitted through encrypted HTTPs channels.
- Access to the Teleophthalmology solution is password protected, using industry recommended password complexity requirements.
- The program employs a role-based access controls

Retina safeguards include, but are not limited to:

Administrative Safeguards

- Privacy and Security policies and procedures are in place as set out in frameworks. Upon hire, staff are required to complete mandatory privacy and security training courses in accordance with PHIPA, Ontario Regulation 329/04 and any other applicable law and regulation.
- Employees sign an Employment Agreement; as well as an annual Confidentiality Agreement, in addition to having to comply with various HR/Privacy/Security Policies outlining User Responsibilities.
- Staff with access to Personal Health Information are required to undergo Criminal Background Checks
- There are designated Privacy and Information Security Personnel to lead the compliance efforts
- Roles & Responsibilities of Members and Participating Organizations are provided in Membership and Terms of Service Agreements
- OTN and Retina Labs Rd Inc. have entered into a contractual agreement to detail the requirements, obligations and compliance to PHIPA.

Physical Safeguards

- The Retina Labs RD Inc. production servers hosting the Telophthalmology Service are located in a secure Data Centre with strict physical access controls, including but not limited to, mantraps, security guards, and CCTV monitoring.

Technical Safeguards

- All data is transmitted through encrypted HTTPs channels.
- Access to the Teleophthalmology solution is password protected, using industry recommended password complexity requirements.

- Teleophthalmology data resides on a server that is both logically and physically segregated from other servers and services. The servers, including for contingency plans and data backup, are located in Canada
- All activities on the Telephththalmology solution are logged and available for review as required including routine audits of access and changes
- The program employs a role-based access controls

Where can I get more information about OTN's Privacy Practices?

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

***Ontario Telemedicine Network
Privacy Office***

438 University Avenue, Suite 200, Toronto, ON M5G 2K8

Email: privacy@otn.ca | Tel: 416-446-4110 / 1-855-654-0888 / TTY: 1-855-368-6889