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Introduction

The eHealth Centre of Excellence (eCE) conducts Privacy Impact Assessments (PIAs) and Threat Risk Assessments (TRAs) as a core compliance and risk management process. The following is a summary of the PIA and includes background on the eCE Automates Program which the eCE is accountable. The summary outlines eCE's progress in implementing the recommendations contained in the PIA and contact information for individuals who are interested in receiving more information.

Background

The eCE has been working for several years to strengthen the supports provided to primary care providers as it relates to data quality improvements and more recently the sharing of information. The eCE is introducing a cloud-based Robotic Processing Automation (RPA) solution ('the solution'), robots or "bots" to help reduce the administrative burden, allowing physicians to focus on the more important elements of patient care. Bots are technology software programed to interact with digital systems - automating business processes. Bots access healthcare applications to capture, interpret, and trigger action on manual, repetitive tasks with greater speed and accuracy than humans, enabling individuals to focus instead on delivering care or other high value duties.

The solution includes two automated tools called 'Cody' and 'Sharon' which the eCE will pilot before making generally available in 2020/21. Cody runs in the background to standardise data in a patient's electronic medical record (EMR). This improved data quality enables primary care to support a deeper understanding of population health needs, to provide more proactive care to patients, and to guide strategic resource allocation. Sharon enables secure digital sharing of personal health information (PHI) between physicians' Electronic Medical Records (EMRs) and Ontario Health (Shared Services)'s portal, Health Partner Gateway (HPG) to be made available to home and community care providers (H&CC).

Privacy Impact Assessment

The PIA was conducted on the two solutions as described in spring 2020 by a consulting firm external to the eCE. The PIA assessed readiness for solution go live for use with PHI. The process involved:

- Confirming the solution's scope;
- Identifying key stakeholders and their roles and responsibilities;
- Gaining an understanding of the solution's design and functionality, and its related business processes, information flows and safeguards;
- Assessing potential privacy issues and risks, particularly in connection with the application of the Personal Health Information Protection Act, 2004ii (PHIPA) and its regulation; and
- Identifying any other privacy issues/concerns and recommending strategies for addressing them.

The PIA was informed by a contemporaneous threat risk assessment (TRA). The results of the TRA are included in a separate TRA summary report.

The privacy analysis focuses mainly on the requirements identified in the (existing and proposed) legal agreements and found in PHIPA and its regulation. It further applies the 10 Privacy Principles upon which the legislation is based.

Privacy Impact Assessment Recommendations

In summary, the PIA identified privacy controls related to the solution that should be enhanced to support the scalability of the program and other risks pertaining to existing eCE operations including the following key recommendations:

Theme	Privacy Principal	Recommendation	Risk Rating
Technical safeguards related to TRA	<ul style="list-style-type: none"> Safeguards 	Mature and implement the end-to-end process for privacy logging, auditing, privacy breach detection and management	High
Privacy Management Program	<ul style="list-style-type: none"> Accountability Limiting Collection, Use, Disclosure & Retention 	Continue to mature and refine policies related to the access, data retention, breach management and user audits. eCE to clarify team roles and responsibilities for privacy and provide more detailed policy guidance.	Medium
Agreement model	<ul style="list-style-type: none"> Accountability 	Validate privacy model, including agreement model	Medium
Public facing material	<ul style="list-style-type: none"> Identifying Purposes and Openness Individual Access Accuracy 	Finalize and make available the privacy-related materials on the website, including content on accuracy of the solution and a general description of the safeguards in place to protect against unauthorized use and disclosure, and to protect the integrity of the information.	Medium
Health sector context	<ul style="list-style-type: none"> Consent 	Informed and aware of information sharing practices and approaches for dealing with consent directives in various sectors/applications	Medium

Please contact the Privacy Officer should you have any questions.

Privacy Contact

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