

### Date: 2020-11-16

## eCE Automates Program

The eHealth Centre of Excellence (eCE) conducts Privacy Impact Assessments (PIAs) and Threat Risk Assessments (TRAs) as core compliance and risk management process. The following is a summary of the TRA and includes background on the eCE Automates Program. The summary also outlines eCE's progress in implementing the recommendations contained in the TRA.

# 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).

# Purpose

Under O. Reg. 329/04 of Personal Health Information Protection Act (PHIPA), a health information network provider (HINP) shall perform and a written copy of the results of an assessment of the services provided with respect to the threats, vulnerabilities and risks to the security and integrity of personal health information (PHI). This threat and risk assessment is commonly known as a TRA.

The eHealth Centre of Excellence contracted an independent third party to complete a TRA for eCE Automates implementation.

# Threat Risk Analysis and Recommendations

The TRA risk findings can be grouped into 7 major themes/areas and makes recommendations on identified areas to improve the overall security of the eCE automates solution based on a point in time analysis. These recommendations include:



### 1. Security Audit & Logging Process

Implementation of audit & logging policy auditable events items within the eCE Automates production environment.

Administrative and security logging enabled.

### 2. Access Controls Management Process

Implementation of access management policy within eCE production environment.

IAM policy enabled and audits user access and creates role assignment reports.

#### 3. Technical Controls

Implementation of comprehensive hardening standards.

Formal hardening standards (CIS) have been implemented.

### 4. Security Testing

A formal process that identifies, from an application security perspective, potential vulnerabilities within the development environment.

#### 5. Security Program Development

A security-focused description of roles and responsibilities for eCE Automates employees. Developed at the eCE organization level should inform the eCE Automates security program.

#### 6. Security Awareness

A security-focused campaign to ensure all eCE Automates employees understand their security responsibilities. Developed at the eCE organization level should inform the eCE Automates security program.

#### 7. Resiliency process

A formal process outlining the eCE Automates change management process as well as outlining a disaster recovery plan.

### Request More Information

If you would like more information about this TRA, please contact:

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