

Alberta Electronic Health Record (EHR)

An Alberta Netcare Guide for Authorized Custodians and/or their Authorized Affiliates

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**An Alberta Netcare Guide for Authorized Custodians
and/or their Authorized Affiliates**

Table of Contents

Contents

1 Executive Summary4

2 Alberta EHR Benefits6

3 Alberta EHR Governance8

4 Alberta EHR Safeguards 16

5 Authorized Custodians21

6 Custodial Responsibilities24

7 Streamlined Custodial PIAs33

8 Contacts35

An Alberta Netcare Guide for Authorized Custodians and/or their Authorized Affiliates

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An Alberta Netcare Guide for Authorized Custodians and/or their Authorized Affiliates

1 Executive Summary

Alberta Netcare, also known as the Alberta Electronic Health Record (Alberta EHR) is the integrated provincial electronic health information network that provides shared access to prescribed health information, by authorized custodians, in a secure environment. Alberta Health and Alberta Health Services (AHS) are jointly responsible for many of the e-health systems that comprise the Alberta EHR. Access to the Alberta EHR is granted through Alberta Netcare to authorized custodians and their authorized affiliates in order for them to access and share health information electronically and in a secure way.

The majority of custodians manage health information through electronic record systems such as electronic medical records (EMR) systems, clinical information systems (CIS) or laboratory information systems (LIS). It is via these systems that custodians allow health information under their custody and control to be made available and shared through Alberta Netcare. As well Alberta Netcare houses prescribed health information in various Alberta repositories and registries. System-to-system (S2S) is being implemented in Alberta Netcare which will allow information that is being updated in the custodian information system or a repository to be updated to the EHR in 'real-time'. Currently S2S has been implemented for the Pharmaceutical Information Network (PIN), the Alberta EHR drug information repository; and will make dispense information from a pharmacy's record management system available within moments via Alberta Netcare to other authorized custodians and their affiliates.

The purpose of this document is to:

- a. provide clarity to authorized custodians who may approve their affiliates' access to the Alberta EHR;
- b. support custodians in ensuring privacy and security safeguards are implemented for the Alberta EHR, and to;
- c. assist authorized custodians to identify their roles and responsibilities in relation to other members of staff.

It also explores or provides guidance on custodian-affiliate relationships that may be formed in order to assist authorized custodians in discharging their duties under the *Health Information Act (HIA)*.

In the Alberta EHR, authorized custodians may access and use health information for diagnostic, treatment, and care purposes. They can also access and use it to determine eligibility and to carry out other purposes as authorized under HIA. Authorized custodians may also provide staff with access for those same purposes.

An Alberta Netcare Guide for Authorized Custodians and/or their Authorized Affiliates

Authorized custodians must submit privacy impact assessments (PIAs) to the Office of the Information and Privacy Commissioner (OIPC) before accessing the Alberta EHR. When completing their specific PIAs, they can leverage various Alberta Netcare documents.

The **Alberta Health - Alberta Netcare Portal (ANP) PIA**, under OIPC file number H3879 was accepted on March 18, 2013. The ANP is a web-based portal application that is the exclusive entry point/viewer of prescribed health information that resides in the EHRIS. A copy of the ANP PIA can be accessed at this link:

http://www.albertanetcare.ca/documents/ABNetcarePortal_PIA.pdf.

The EHRIS is continually evolving as other components such as Electronic Medical Records (EMRs), Pharmacy Practice Management Systems (PPMS) and other Clinical Information Systems (CIS) integrate with the Alberta Netcare. As part of the ANP PIA, Alberta Health completed the “**An Overview of Alberta’s Electronic Health Record Information System**” (http://www.albertanetcare.ca/documents/An_Overview_of_Albertas_ERHIS.pdf) as an overview, high level, document which outlines the major components of the EHRIS.

The **Alberta Health Services (AHS) - Netcare Clinical Repositories (NCR) PIA - Provincial Health Information Exchange (pHIE) Addendum**, under OIPC file number H5172 was accepted on February 14, 2013. This NCR PIA – pHIE Addendum explains how prescribed health information is routed and made accessible via the ANP. A copy of the AHS-NCR PIA-pHIE Addendum can be obtained by contacting AHS via E-mail at privacy@albertahealthservices.ca.

An Alberta Netcare Guide for Authorized Custodians and/or their Authorized Affiliates

2 Alberta EHR Benefits

The Alberta Electronic Health Record (Alberta EHR), also known as Alberta Netcare, is the integrated provincial electronic health information network that provides shared access to prescribed health information, by authorized custodians, in a secure environment. Alberta Health is the information manager (IM) for the Alberta EHR.

Alberta Health and Alberta Health Services (AHS) are jointly responsible for many of the e-health systems that comprise the Alberta EHR. The document, “*An Overview of Alberta’s Electronic Health Record Information System*”, was developed to summarize the Alberta EHR and the primary information systems which comprise it. This document was originally created in February 2013, was updated in August 2011 and in April 2015 and has been posted to the Alberta Netcare login page for access by health stakeholders:

http://www.albertanetcare.ca/documents/An_Overview_of_Albertas_ERHIS.pdf .

2.1 Benefits For Albertans

For patients, the Alberta EHR in general, and access to Alberta Netcare by authorized custodians and their affiliates in particular, helps improve the quality and safety of patient care by:

- providing more accurate and up-to-date medical information about a patient;
- presenting this information immediately at the point of care which reduces delays in treatment, helps to ensure that the most appropriate treatment decisions are made on the most current information available, which improves health outcomes;
- reducing the possibility of medical error by improving completeness, accuracy and clarity of medical records assessed at the point of care;
- streamlining the secure sharing of prescribed health information between health service providers; and
- giving authorized health service providers a common understanding of a patient’s medical condition. This helps prevent the duplication of tests such as blood and lab work, unnecessary treatments, and adverse events such as harmful prescription drug interactions.

Members of the public can obtain information on the Alberta Netcare website by accessing this link: <http://albertanetcare.ca/InfoForAlbertans.htm>

An Alberta Netcare Guide for Authorized Custodians and/or their Authorized Affiliates

2.2 Benefits For Custodians and Their Authorized Affiliates

Access to the Alberta EHR is granted through Alberta Netcare to authorized custodians and their authorized affiliates to view patients' prescribed health information that is housed in various Alberta Health repositories and registries, AHS clinical systems, and community site clinical systems. In some interfaces, such as System to System (S2S), access to the Alberta EHR is a direct connection between the Alberta Health systems and local systems. Some community pharmacies, for example, have S2S connection to the Pharmaceutical Information Network (PIN).

For authorized Alberta Netcare users, access to the Alberta EHR provides up-to-date information at the point of care by:

- giving healthcare providers access to comprehensive key patient information along with online decision support and reference tools;
- helping to reduce the possibility of medical errors, assisting with compliance issues, and decreasing the potential for adverse drug reactions;
- helping to avoid the need to order duplicate tests by making previous data available; and
- including features like lab value trends and drug monographs which can help with patient consultations.

An Alberta Netcare Guide for Authorized Custodians and/or their Authorized Affiliates

3 Alberta EHR Governance

3.1 Health Information Act (HIA)

The structure and development of the Alberta EHR is in part directed by the HIA. The HIA governs the collection, use, disclosure and protection of health information in the custody or control of custodians, including Alberta Health, AHS and health services providers who are designated as custodians. The HIA allows health information to be shared and accessed without the consent of the patient to provide health services and manage the health system. It also requires custodians to take reasonable steps to maintain administrative, technical and physical safeguards to protect privacy and confidentiality of health information. The HIA and its accompanying Electronic Health Record Regulation (available through the Alberta Queens Printer <http://www.qp.alberta.ca/>) describes how the sharing and use of prescribed health information, through Alberta Netcare, by authorized custodians can be enabled.

3.1.1 Custodianship and IM Roles

A custodian is defined in section 1(1)(f) of the HIA and includes Alberta Health, AHS and members of regulated health professions who are designated as custodians in the HIA Regulation.

A custodian is responsible to collect, use, disclose, and protect health information within its custody and control in accordance with provisions set out in the HIA. A Custodian also has a duty to identify its affiliates (employees, information manager's (IMs) and persons who provide services for the custodian) and to take reasonable steps to ensure they comply with the HIA and the custodian's policies and procedures. An affiliate's collection, use or disclosure of health information is considered to be a collection, use or disclosure by the custodian. An affiliate must comply with the HIA and the custodian's policies and procedures.

An "authorized custodian" is a custodian who has been given access to the Alberta EHR. Authorized Custodians include Alberta Health, AHS, and any other custodian that has met the following eligibility requirements set out in the Alberta Electronic Health Record Regulation:

- obtain approval for access to the Alberta EHR from Alberta Health;
- prepare and submit a Privacy Impact Assessment (PIA) for review, comment and subsequent acceptance by the OIPC;

An Alberta Netcare Guide for Authorized Custodians and/or their Authorized Affiliates

- prepare and submit a Provincial Organizational Readiness Assessment (pORA) and which has been approved by Alberta Health Security;
- sign an Information Management Agreement (IMA) with Alberta Health;
- the health profession body that the custodian belongs to has developed Standards of Practice that pertain to the management of electronic records, including, without limitation, standards respecting the protection, privacy and security of electronic records.

Under the HIA s.56.5, authorized custodians outside of Alberta Health and AHS may only use health information for authorized purposes of providing health services, verifying eligibility for services and benefits, or for obtaining or processing payments for health services.

The EHR Regulation designates Alberta Health as the IM of the Alberta EHR (s. 2). In this role, Alberta Health is obligated by s. 66(4) and (5) of the HIA to only use or disclose health information for purposes authorized by the IM agreement and to comply with the HIA.

“Authorized custodians” who contribute to, or access health information made available through, Alberta Netcare are participating in the integrated electronic health information system established to provide shared access to health information. Custody and control of this information, and the duties to use, disclose and protect the information in the Alberta EHR are shared amongst all participating custodians as everyone has a role to play.

As the IM of the Alberta EHR, Alberta Health is obligated by the HIA s. 66(2) and the Information Manager Agreement to:

- 1) manage the collection, use, disclosure, processing, storing and retrieval of health information from all sources;
- 2) respond to access and correction requests for patients who don't have a care relationship with an authorized custodian;
- 3) protect and store health information securely;
- 4) conduct an audit each month of the information logs; and
- 5) facilitate authorized custodians to address the expressed wishes of patients in accordance with the IMA and the IEP.

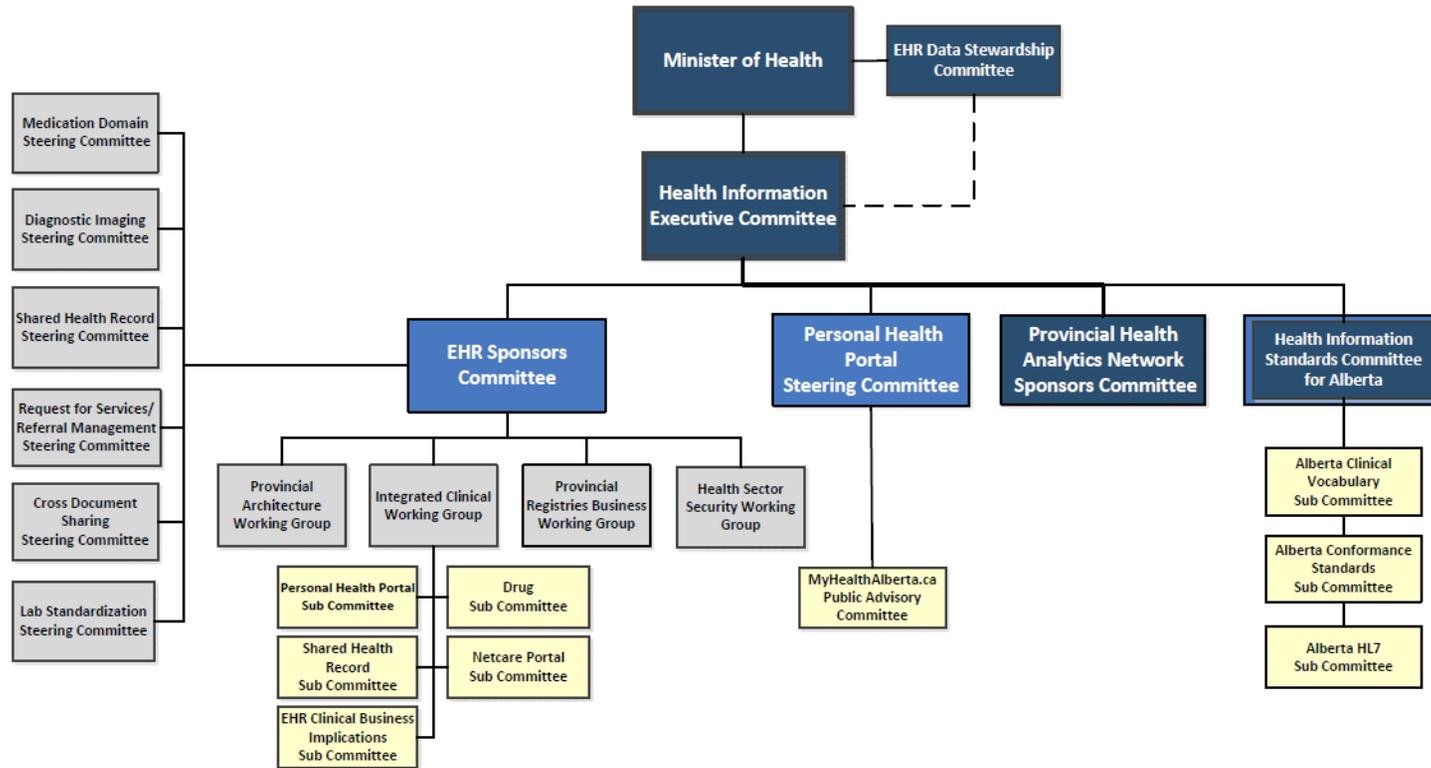
An Alberta Netcare Guide for Authorized Custodians and/or their Authorized Affiliates

3.2 Governance Structure

Alberta Health has established an extensive and comprehensive provincial health system Information Management/Information Technology (IM/IT) governance structure. This structure helps ensure that custodians and IM's collect, use, disclose and secure health information in the Alberta EHR in compliance with the IEP. The committees and working groups involved in leading, planning, directing, monitoring and executing the Alberta EHR, and their relationships and roles, are documented in the following chart:

An Alberta Netcare Guide for Authorized Custodians and/or their Authorized Affiliates

Alberta Provincial Health System IM/IT Governance Model - DRAFT



Governance Structure - Scope
DRAFT – July 9, 2014

STRATEGY Vision, strategy, business plan, priorities, budget	DIRECTION Oversight of execution, consistency with business directions, recommend	EXECUTION Execution, delivery, implementation	Sub Committees as Required
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An Alberta Netcare Guide for Authorized Custodians and/or their Authorized Affiliates

3.2.1 Minister of Health

The Minister of Health has the highest executive authority and accountability for governing the privacy and security of the Alberta EHR. Ministerial authority is directly cited in many provisions within the HIA, specifically relating to use and disclosure of health information for department purposes, and in particular, for the development and operation of the Alberta EHR.

On a program level, the Minister directs and monitors Alberta Health progress in achieving goals and strategies. For example “*Becoming the Best: Alberta’s 5-year Health Action Plan, 2010-2015*”, includes, under the Build One Health System Strategy, the objective to “*use technology to share health information, while ensuring personal privacy.*” This action plan may change in the future but the Minister’s mandate will continue.

3.2.2 EHR Data Stewardship Committee (EHRDSC)

The EHR Data Stewardship Committee (EHRDSC) is the collective representative of the custodians, users, and public stakeholders of the health system and the key governing body of the Alberta EHR. The custodians include Alberta Health, AHS, physicians (represented by CPSA and Alberta Medical Association (AMA)), pharmacists (represented by Alberta College of Pharmacists (ACP) and Alberta Pharmacists’ Association (RxA)). The committee also includes 3 members of the public, a medical ethicist, representatives from the Federation of Regulated Health Professionals and academic representatives from Alberta universities. The 2010 amendments to the HIA (Part 5.1), made it mandatory for regulated health professionals to submit prescribed health information of their patients to the Alberta EHR system, as directed by their health professional body (HPB) or by the Minister, in consultation with the HPB and the OIPC. The HIA, s 56.7(1) also established the EHRDSC to make recommendations to the minister on rules related to access, use, disclosure and retention of prescribed health information through the Alberta EHR.

The EHRDSC maintains the Alberta Netcare IEP, which sets out the specific rules for use of prescribed health information in the Alberta EHR. The IEP is incorporated by reference into the Alberta EHR IMA, which means that all Alberta EHR users must adhere to the IEP. The rules in the IEP work in conjunction with the HIA and authorized custodians must ensure all authorized Alberta EHR users fully comply with the HIA and the IEP when using prescribed health information in the Alberta EHR. The EHRDSC reviews and approves standards and processes for user access management, including audit logging, masking and the ANP User Access Matrix.

An Alberta Netcare Guide for Authorized Custodians and/or their Authorized Affiliates

3.2.3 Health Information Executive Committee (HIEC)

The Health Information Executive Committee (HIEC) has overall responsibility to provide strategic leadership for the Alberta EHR and initiatives in the publicly funded IM/IT health sector, as well as for intergovernmental EHR and e-health initiatives. This committee is chaired by the Deputy Minister (DM) of Health, and includes the highest executive officers of AHS, AMA, and ACP, along with the two AHS senior executive members and the Assistant Deputy Minister (ADM) of Alberta Health responsible for health information IT. The committee reports directly to the Minister of Health.

This committee approves the terms of reference and strategic direction for the IM/IT Strategy Committee, the EHR Sponsors Committee, and steering committees for specific initiatives. The HIEC approves the five-year strategic IT plan for the Alberta EHR and ensures alignment with national and international EHR initiatives. They have a key role in advising and guiding the EHRDSC on EHR priorities and strategic direction.

3.2.4 EHR Sponsors Committee

The EHR Sponsors Committee, reporting as an advisory committee to the HIEC, is responsible for directing, coordinating and monitoring all provincially funded e-Health initiatives including ANP enhancements to ensure they meet the EHR standards and objectives set by the HIEC and the EHRDSC. This committee appoints and sets terms of reference for various project-based steering committees implementing specific EHR initiatives. Currently, these initiative-level committees include the:

- Medication Domain Steering Committee,
- Diagnostic Imaging Steering Committee,
- Shared Health Record Steering Committee,
- Request for Services / Referral Management Steering Committee,
- Cross Document Sharing Steering Committee, and
- Lab Standardization Steering Committee

There are also four working groups that report to the EHR Sponsors Committee - they include the Provincial Architecture Working Group (PAWG), the Integrated Clinical Working Group (ICWG), the Provincial Registries Working Group (PRWG) and the Health Sector Security Working Group (HSSWG).

The (PAWG) reviews and aligns IT design of Alberta EHR systems with provincial IT architectural plans and criteria.

The (ICWG) is a multidisciplinary working group overseeing a number of specialized system subgroups to ensure that clinical functions, issues, and needs are addressed and integrated into the EHR systems during their design, implementation, and operation. ICWG forwards

An Alberta Netcare Guide for Authorized Custodians and/or their Authorized Affiliates

recommendations regarding policy and strategy to the EHR Sponsors Committee when appropriate.

A number of additional sub-committees, reporting directly to ICWG, guide and design implementation of current EHR initiatives supporting such areas as diagnostic imaging, chronic disease management, and the SHR. All Alberta Health or AHS project and delivery teams deploying and maintaining the EHR component systems report regularly and work directly with these workgroups, subgroups, and steering committees.

3.2.5 Personal Health Portal (PHP) Steering Committee (PHPSC)

Reporting to HIEC, PHPSC provides guidance and decision-making on business issues and planning for PHP. This includes investments, PHP information management content, functionality, technology and services alignment with provincial plans, communication among stakeholders and with the public on PHP, and coordination support between and within PHP stakeholder groups.

3.2.6 Provincial Health Analytics Network Sponsors Committee (PHANSC)

The Provincial Health Analytics Network (PHAN), is a collaborative Alberta Health and AHS project that combines Alberta Health business intelligence information (BIE) information with AHS information that will be operated under a joint governance framework. The PHAN will be an authoritative source of clinical and administrative data maintained specifically for health system analytics. The PHAN will provide an environment where data sets from contributing stakeholders can be analyzed and integrated in support of health systems management, clinical program improvement, monitoring of health in Alberta and related health research.

The PHAN, as a repository, will be complemented by a robust and mature analytic competency model that will provide expertise to various consumers of data. This centralized analytics core will be connected to program-embedded analysts across Alberta Health and AHS, in addition to providing support to other health system stakeholders including academic research, the Health Quality Council of Alberta (HQCA), the Institute for Health Economics and other Government of Alberta departments. Reporting through to HIEC, the PHAN Steering Committee is the joint advisory body that will monitor and assess the relationship between health information held in the EHR and the PHAN. The use and disclosure of the information in the PHAN will comply with the HIA and the research process set out in Division 3.

3.2.7 Health Information Standards Committee for Alberta (HISCA)

Health Information Standards Committee for Alberta (HISCA) sets and coordinates implementation of health information standards for the Alberta health system that are consistent with national and international standards. This includes minimum data sets as well as content, format and messaging standards.

An Alberta Netcare Guide for Authorized Custodians and/or their Authorized Affiliates

3.3 EHR Governing Agreements and Programs

3.3.1 Information Exchange Protocol (IEP)

This protocol was first developed and affirmed by Alberta Health, the predecessor health regions of AHS, and key health care professional bodies in 2003, and was most recently updated in 2007. The IEP in conjunction with the HIA establishes the conditions and terms for the exchange of health information within the Alberta EHR.

The IEP provides detailed rules and procedures for use, disclosure, right of access, integrity, and security of health information accessed by healthcare providers using Netcare, including roles and procedures for breach investigations. The protocol is part of the conditions understood and accepted by authorized custodians when they sign the Information Manager Agreement (IMA) prior to gaining access or contributing to various components of the Alberta EHR.

3.3.2 Information Sharing Framework (ISF)

The ISF is a collaborative effort between AHS and the AMA that enables the creation of shared electronic medical records across the ambulatory/outpatient care environments. The ISF establishes a governance model that sets out how participating custodian's duties under the HIA will be met for the shared EMR. This creates a formal information management relationship between participating physicians and AHS. It also establishes an Information Stewardship Office to oversee compliance with the ISF agreements and address privacy and security considerations. The ISF became operational in the Edmonton area in March 2012 and was extended into the Calgary area in 2013. The ISF is sufficiently flexible to allow for additional shared EMRs to be added to the framework as needed.

An Alberta Netcare Guide for Authorized Custodians and/or their Authorized Affiliates

4 Alberta EHR Safeguards

4.1 Access to the Alberta EHR

The *HIA* EHR Regulation section 3 provides the requirements that must be met for a custodian to become an authorized custodian. Only authorized custodians can access the Alberta EHR. All authorized custodians must sign an IMA with Alberta Health. Only then are these authorized custodians allowed to register themselves or their affiliates as authorized users and be given a login ID. Access guidance and instruction is also provided via the Alberta Netcare Access Administrator (AA) Guide.

An AA is the primary contact with Alberta Health at the facility/site of an authorized custodian. Within each authorized custodian's facility only those affiliates who meet eligibility requirements, as confirmed by the authorized custodian's AA, become authorized users of the Alberta EHR (and therefore can access prescribed health information via Alberta Netcare). The type of health information accessed via Alberta Netcare by authorized custodians and their affiliates is based on user role permissions, as described in the Alberta Netcare Permission Matrix. This means that access permissions and other security credentials are set up so that users have enough information to do their jobs, while ensuring that information is accessible on a 'need-to-know' basis.

Roles are well-defined for the ANP application and are divided into three categories: Administration, Pharmacy and Clinical. Alberta Health developed the Alberta Netcare Permission Matrix in collaboration with AHS via the HSSWG. Prior to its implementation, it was reviewed and approved by the EHRDSC.

Alberta Netcare is a web-based application delivered via a secure browser interface, called the Alberta Netcare Portal (ANP). Internet access can be from within a secure network (e.g. AHS facility) or from remote sites (e.g. physician office). Alberta EHR users accessing Alberta Netcare within a secure zone do not require "two factor" authentication, as they have met the pre-established Alberta Health Minimum Connectivity Requirements" (MCR) and only have to use their Alberta Netcare username and password. All Alberta EHR users from remote sites such as private providers (including long term care organizations), physician offices, and pharmacies are required to use "two factor" authentication using either a hard or soft token along with their Alberta Netcare username and password. Some long term care organizations and physician offices are located within AHS facilities. If they connect to the AHS network, then they would be considered to be within the secure zone.

An Alberta Netcare Guide for Authorized Custodians and/or their Authorized Affiliates

Section 3(c) of the EHR Regulation and Alberta Health Department standards also require authorized custodians from remote sites such as private providers (including long term care organizations), physician offices, and pharmacies to conduct a Provincial Organizational Readiness Assessment (pORA). pORA reviews are designed to ensure that administrative, technical, and physical IT security controls are in place to mitigate risks of accidental or malicious access to prescribed health information via Alberta Netcare and/or regional systems. This includes ensuring that their computer systems and office processes are capable of protecting health information, by requiring that:

- All authorized Alberta Netcare users utilize a 'User Name' and 'Password' to enable Alberta Netcare access. The 'User Name' and 'Password' validate that the users are who they say they are (authentication).
- All Alberta EHR users must be aware of the *Terms of Use and Disclaimer* for Alberta Netcare.

An accepted PIA is a prerequisite before a pORA can be reviewed and approved. Then, an Information Manager Agreement (IMA) can be signed by the Custodian.

4.2 Privacy Safeguards

4.2.1 Privacy Impact Assessments

Alberta's *HIA* section 64 requires that the OIPC receive a PIA for "*review and comment*" before a custodian implements "*proposed administrative practices and information systems relating to the collection, use or disclosure of individually identifying health information*" or makes "*proposed changes to an existing system or practice.*" PIAs are mandatory under the *HIA* and preferably should be accepted by the OIPC prior to implementation of the project.

A PIA is a due diligence exercise where a custodian identifies and addresses potential privacy and security risks that may occur in a project. A PIA describes the information flows in the project, identifies the legal authorities that allow for the flow of information, assesses potential impacts on, and risks to, privacy and identifies mitigation strategies to minimize those risks. The PIA tells the story of the project through the eyes of privacy legislation and best practices. Through the identification, analysis, and management of privacy risks a custodian is able to demonstrate that it is adhering to legislation and best practices. By doing a PIA it may also help identify or prevent unanticipated delays or cost overruns to project design due to privacy and security requirements.

An Alberta Netcare Guide for Authorized Custodians and/or their Authorized Affiliates

The OIPC has developed a document titled “Privacy Impact Assessment Requirements” to assist custodians in reviewing the impact that the new project may have on individual privacy. The Commissioner will review the PIA and once satisfied that the custodian meets a reasonable level of privacy protection, the Commissioner will “accept” the PIA. Acceptance is not approval; it merely reflects the Commissioner’s opinion that the custodian has made reasonable efforts to protect privacy. The onus remains on the custodian to ensure adequate levels of privacy protection.

4.2.1.1 Alberta EHR Privacy Impact Assessments

The Alberta EHR is the integrated provincial electronic health information network that provides shared access to prescribed health information, by authorized custodians, in a secure environment. The scope of the Alberta EHR is limited to networked health information systems for which Alberta Health is either the Information Manager or custodian.

PIAs have been submitted for all current components of the Alberta EHR, with a number of new submissions, addendums, and updates planned for the near future. Because the Alberta EHR is jointly developed and operated by Alberta Health and AHS, Alberta Health and AHS have instituted a system of joint PIA submissions, with one custodian named as either the owner or key stakeholder, but with both custodians contributing to development and final approvals before submission. The role of each custodian in an Alberta EHR PIA process will be dependent on the degree to which they have direct responsibility for developing the system and maintaining the health information. For example, the document, “**An Overview of Alberta’s Electronic Health Record Information System**” (http://www.albertanetcare.ca/documents/An_Overview_of_Albertas_ERHIS.pdf), was developed to summarize the Alberta EHR and the primary information systems which comprise it and is meant to be an accompanying document to the Alberta Health’s ANP PIA (OIPC file number H3879), which has been accepted by the OIPC.

In addition, AHS has an accepted Netcare Clinical Repositories (NCR) PIA - Provincial Health Information Exchange (pHIE) Addendum (OIPC file number H5173). The pHIE plays the role of a central hub or “traffic cop”, routing electronic messages where they need to flow to achieve system-to-system interoperability among Alberta EHR repositories and applications. In essence, the pHIE enables systems participating in the Alberta EHR to appropriately communicate with one another. A copy of the AHS-NCR PIA-pHIE Addendum can be obtained by contacting AHS via E-mail at privacy@albertahealthservices.ca.

Alberta Health is working with physician offices, pharmacies and medical service facilities (managed by nurses) to integrate their systems with the Alberta Electronic Health Record Information System (EHRIS), also known as Alberta Netcare. This document is meant to assist custodians’ PIA or PIA Addendum be accepted by the OIPC and to make each Custodian aware of their custodial responsibilities regarding ANP access. Custodians are able to reference information in these documents, for inclusion in their PIA or PIA Addendum that addresses their systems’ integration with Alberta Netcare.

An Alberta Netcare Guide for Authorized Custodians and/or their Authorized Affiliates

If Custodians are interested in learning more about these Alberta EHR PIAs, they may contact the submitter of the respective PIA(s) via either the Alberta Health HIA Policy, Privacy and Security Unit or the AHS Information and Privacy Unit.

4.2.2 Information Manager Agreements

Information Manager Agreements (IMAs) address the requirements set out in section 66 of the *HIA*. An Information Manager is defined as a person or body that:

- processes, stores, retrieves or disposes of health information,
- in accordance with the regulations, strips, encodes or otherwise transforms individually identifying health information to create non-identifying health information
- provides information management or information technology services.

4.2.3 Expressed Wishes

Alberta Netcare enables viewing of information within Alberta EHR. However, it is important to note that section 56.4 of the *HIA* does require authorized custodians to consider any expressed wishes of the individual in deciding how much prescribed health information to make accessible via the Alberta EHR in the first place.

4.3 Security Safeguards

Access to the Alberta EHR is through the Alberta Netcare, which is a securely-delivered, web-based application that can be accessed remotely via the internet with two-factor authentication (a token) or from a secure zone with valid user credentials.

Security measures include:

- Authorized custodians from community facilities such as private providers (including long term care organizations), physician offices, and pharmacies must conduct a Provincial Organizational Readiness Assessment (pORA), as they are outside of the secure zone. This tool assesses authorized custodians' administrative, technical and physical security controls in order to mitigate risks of accidental or malicious access to prescribed health information.
- Authorized custodians that are within the secure zone have met pre-established Alberta Health Minimum Connectivity Requirements (MCR) and are not subject to pORA requirements. AHS facilities are deemed to be within the secure zone. Some long term care organizations and physician offices are located within AHS facilities. If they connect to the AHS network, then they would be considered to be within the secure zone.
- All authorized Alberta Netcare users must utilize a 'User Name' and 'Password' to enable Alberta Netcare access. The 'User Name' and 'Password' validate that the users are who they say they are (authentication).

An Alberta Netcare Guide for Authorized Custodians and/or their Authorized Affiliates

- Authorized Alberta Netcare users are restricted to access prescribed health information based on the user role and profession (authorization).
- Authorized Alberta Netcare users outside the secure zone must use two-factor authentication to access Alberta Netcare.
- Authorized Alberta Netcare users within the secure zone do not require two-factor authentication to access Alberta Netcare.
- All user-initiated activity is logged and audited.
- Alberta Health performs audits of information logs monthly, randomly, and on the request of patients or health services providers.
- All Alberta EHR users must be aware of the *Terms of Use and Disclaimer* for Alberta Netcare.

4.3.1 Provincial Organizational Readiness Assessment (p-ORA)

The pORA, is a risk assessment instrument for a participating custodian, such as a physician or pharmacy licensee; practicing outside of an AHS facility. The pORA describes the technical, administrative and physical security controls for community sites that request access to ANP and/or regional systems. An accepted PIA and a completed pORA are required in order to sign an IMA before access to Netcare is granted.

An Alberta Netcare Guide for Authorized Custodians and/or their Authorized Affiliates

5 Authorized Custodians

5.1 Alberta Health

Alberta Health is a custodian as defined by the HIA. All staff working for Alberta Health are affiliates of Alberta Health.

5.2 Alberta Health Services (AHS)

AHS is a custodian as defined by the HIA. All staff working for AHS are affiliates of AHS.

Any staff accessing and using the Alberta EHR in AHS facilities are doing so as an authorized affiliate of AHS.

AHS has met their requirements of being an Authorized Custodian (has completed a PIA, a pORA and has signed an IMA) via the previous Regional Health Authorities that were dissolved and consolidated into AHS. AHS is working towards refreshing these requirements as part of the new AHS organizational structure.

5.3 Physicians

Physician Office

There are various viable scenarios in a physician office:

1. All physicians in the office are authorized custodians.
 - In this case, each physician may access and use the Alberta EHR because each physician has complied with the requirements to become an authorized custodian.
 - Each physician is responsible for approving their own affiliates for access to the Alberta EHR.
 - In a larger office or shared practice, physicians may opt to appoint an “access administrator” – an individual who is responsible for ensuring that all appropriate approvals for Alberta EHR access are being met for all staff in that office. If a physician leaves the office, the ability to access the Alberta EHR by other authorized custodians and their affiliates is not impacted.

An Alberta Netcare Guide for Authorized Custodians and/or their Authorized Affiliates

2. Some physicians in the office are authorized custodians whereas others are not.
 - Some physicians have not taken the steps to become authorized to access and use the Alberta EHR. In this situation, only those physicians that are authorized custodians will be able to provide their affiliates with access to the Alberta EHR.
 - Authorized custodians may not authorize access to the Alberta EHR for non-affiliates (e.g. an authorized custodian must not provide access to an employee of another physician).
3. No physicians in the office are authorized custodians.
 - None of the physicians have met the requirements to become an authorized custodian. Nobody in this office is authorized to access and use the Alberta EHR.
4. Multiple physicians in the office are custodians but have agreed in writing to apply to the Minister to be designated as the affiliates of a single custodian (physician) in that office.
 - The physician that has agreed to become the single authorized custodian in the office and may access and use the Alberta EHR, as well as authorize affiliates to the same end.
 - The authorized custodian may opt to appoint an “AA”. An AA is an individual who is responsible for ensuring that all appropriate approvals for Alberta EHR access have been obtained for all staff in that office. If the physician who is the authorized custodian leaves the office, then another authorized custodian must be identified otherwise access to, and use of, the Alberta EHR will no longer be permitted.
5. A physicians or group of physicians are employed by a custodian and therefore are the affiliate of the custodian.
 - Each custodian is responsible for approving their own affiliates for access to the Alberta EHR.

5.4 Pharmacists/Pharmacies

Pharmacists/pharmacies may access and use the Alberta EHR once they have complied with the requirements to become an authorized custodian. There are a couple of various scenarios that are applicable to pharmacists/pharmacies:

1. The pharmacist/pharmacy is the authorized custodian.
 - In this case, each pharmacist/pharmacy may access and use the Alberta EHR because they have complied with the requirements to become an authorized custodian.
 - Each pharmacist/pharmacy is responsible for approving their own affiliates for access to the Alberta EHR.

An Alberta Netcare Guide for Authorized Custodians and/or their Authorized Affiliates

- In a pharmacy chain or large independent pharmacy, the pharmacy/pharmacist may opt to appoint an “AA” – an individual who is responsible for ensuring that all appropriate approvals for Alberta EHR access are being met for all staff.
2. If the pharmacist is employed by a custodian, they are an affiliate of that custodian.
 - Each custodian is responsible for approving their own affiliates for access to the Alberta EHR. An example of this is a pharmacist that works for AHS.

5.5 Registered Nurses

Registered Nurses (RNs) may access and use the Alberta EHR once they have complied with the requirements to become an authorized custodian. There are two scenarios that are applicable to RNs:

1. The RN is the authorized custodian.
 - In this case, the RN may access and use the Alberta EHR because they have complied with the requirements to become an authorized custodian.
 - Each RN is responsible for approving their own affiliates for access to the Alberta EHR.
 - If the RN is their own health provider and the office is large, the RN may opt to appoint an “AA”.
2. If the RN is employed by a custodian, they are an affiliate of that custodian.
 - Each custodian is responsible for approving their own affiliates for access to the Alberta EHR. An example of this is a RN that works for AHS.

An Alberta Netcare Guide for Authorized Custodians and/or their Authorized Affiliates

6 Custodial Responsibilities

The authorized custodian has several custodial responsibilities, one of which is ultimately responsible for determining which affiliates will have access to the Alberta EHR. However, an authorized custodian may opt to authorize an AA to deal with the operations of:

- Authorizing user permissions in the Alberta EHR
- Training users
- Responding to privacy and security breaches

6.1 Netcare Access Administrators (AA)

6.1.1 Authorizing user permissions to the Alberta EHR

Alberta Netcare AAs act on the custodian's behalf to facilitate Alberta EHR access for their affiliates. As per section 62(1) of the HIA, any collection, use or disclosure of health information by an affiliate of a custodian is considered to be collection, use or disclosure by the custodian. Consequently, the appointed Alberta Netcare AA must ensure that affiliate's ("user") access to the Alberta EHR information is restricted based on their role and their duties to the custodian. This means that access permissions and other security credentials are set up so that users have enough information to do their jobs, but not more than is necessary, and ensuring that information is accessible on a "need-to-know" basis only.

Alberta Netcare AAs must be approved by the authorized custodian for each facility they carry out user access management duties. The custodian appoints the AA by completing the Alberta Netcare Access Administrator (AA) Registration Form.

The appointed AAs are acting on behalf of the custodian to ensure user access to confidential health information is properly administered and given only to those who need access to perform their jobs:

- Community Facilities - The AAs can be the custodian or an appointed affiliate responsible for liaising between the custodian(s) and Alberta Health.
- AHS Facilities - The AAs are AHS affiliates that are approved by the Chief Information Security Officer.
- Alberta Health Facilities - The AAs are Alberta Health affiliates that are approved by the Alberta Health Chief Information Officer.

An Alberta Netcare Guide for Authorized Custodians and/or their Authorized Affiliates

The AA is responsible to ensure that the user's access to Netcare is based on the HIA principle of a need to know and the least amount of information to do their job. Specific responsibilities are:

- Assist the affiliates with access requests and submit the requests in a timely manner. Users are set-up to access the Alberta EHR by completing the Alberta Netcare User Registration Form (URF).
- Support any remote access requirements for the user.
- Restrict user access to the Alberta EHR information in accordance with their duties to the custodian. For example administrative support staff may not need to see patient diagnostic information and therefore should have their access to the Alberta EHR restricted to the role that allows them to perform only their job functions.
- Verify that the user permissions are appropriate for their role or job duties and meet the *HIA* principle stated above.
- Terminate user permissions when access is no longer required.
- Monitor user access to ensure they are adhering to their *HIA* obligations and the IEP rules for collecting, using, and disclosing the Alberta EHR health information.
- Review user's access to information and ensure it is accurate and complete.
- Submit changes to user information and permissions to ensure that information is complete and accurate.
- Comply with legislative and custodian policy obligations when collecting user information while performing Alberta Netcare User access management duties.

Alberta Netcare AAs assist by safeguarding the confidentiality, integrity and availability of the health information under the control of the custodian.

- Protecting the **confidentiality** of information means only authorized users can access sensitive information. It means taking steps to prevent any unauthorized access, use or disclosure of information. Access is based on the user's role and profession. This means that access permissions and other security credentials are set up so that users have enough information to do their jobs, while ensuring that information is accessed only on a "need-to-know" basis.
- The **integrity** of information is about maintaining the reliability and accuracy of information so it can be used to make informed health decisions. An unauthorized change of health information used for decision making, or an error in the information, is an example of something that causes loss of integrity.
- Ensuring the continued **availability** of information means it is accessible to those who need the information. A system outage is something that causes loss of availability.

An Alberta Netcare Guide for Authorized Custodians and/or their Authorized Affiliates

6.1.2 Training Users

Custodians are responsible for the actions of their affiliates. If an affiliate does something that does not comply with *HIA*, it is as if the custodian did it. Consequently, affiliates must comply with *HIA*, as well as with the policies and procedures adopted by the custodian. As the appointed representative of the custodian, the AA must do the following:

- Train users about information security and privacy issues related to the Alberta EHR.
- Inform users that information used in the Alberta EHR is private and confidential and the user must take reasonable steps to maintain the confidentiality of that information.
- Advise users about their compliance obligations under the *HIA*.
- Ensure users understand that a person who knowingly collects, uses, or discloses health information in contravention with the *HIA* may be found guilty of an offence and liable to a fine as defined in the *HIA*.
- Ensure users are aware of the sanctions that can be imposed by their custodians for breaching or attempting to breach the custodian's administrative, technical and physical safeguards in respect to health information.
- Inform users of who is responsible for the overall security and protection of health information that is in the custody or under the control of the custodian.
- Inform users that Alberta Health monitors user access to the Alberta EHR for privacy and security purposes, and to protect the information. By accessing the Alberta EHR users are expressly consenting to these monitoring activities.
- Educate users about what is considered a security or privacy breach and how to report them.

6.1.3 Responding to Breaches

An information security or privacy breach occurs when there is a violation of the: (1) *HIA*; (2) IEP rules for accessing the Alberta EHR information; or (3) security or privacy policies of the custodian. The *HIA* has established fines for anyone who knowingly collects, uses, or discloses health information or who gains or attempts to gain access to health information in contravention of the *HIA*. Individuals who breach privacy and access rules could be subject to criminal charges, fines, and disciplinary measures within their licensing or professional organizations.

An Alberta Netcare Guide for Authorized Custodians and/or their Authorized Affiliates

Consequently the AA must:

- Report information security or privacy breaches or issues promptly as per the defined incident response process to ensure that incidents are managed properly in order to isolate and minimize the effects of an adverse event.
- Assist in investigation of potential information security or privacy breaches in the Alberta EHR.
- Act as a liaison between Alberta Health and the custodian to report and provide status updates on incidents.

6.2 Additional Custodial Responsibilities

6.2.1 Access and Correction Requests

HIA Part 2 sets out the rules that apply to individuals' rights to access their health information, including their prescribed health information accessible via the Alberta EHR. If an individual wants to know who has accessed his/her prescribed health information via the Alberta EHR, the individual must submit an access request to Alberta Health specifically requesting a copy of his/her log. The form for making an access request along with guidelines may be viewed at the Alberta Health public website:

<http://www.health.alberta.ca/documents/HIA-Request-Access-Form.pdf>.

Individuals wishing to request access their prescribed health information or request corrections to possible errors or omissions in their health information may make this request of any authorized custodian with which they have a care relationship. It is recommended that they should try to direct their request to the custodial body, or bodies, responsible for having made that particular prescribed health information accessible via Alberta EHR. The appropriate custodial bodies process the request and or consider if a correction should be made to the record. If the appropriate custodian decides not to make the requested correction, the individual has the opportunity to file a statement of disagreement that can be placed on the record.

6.2.2 Audit Logs

In accordance with HIA s.56.6(1), all accesses to (i.e. uses of) prescribed health information pursuant to s.56.5 HIA must be logged. Alberta Health is the Alberta EHR information manager (s.2 HIA EHR Regulation) and has established the Provincial Logging and Audit Standard for all Electronic Health Record Information Systems. This includes Alberta Netcare and provides a per user access log of all activity on Alberta Netcare and will record who accessed what data and the time each user logs-in.

An Alberta Netcare Guide for Authorized Custodians and/or their Authorized Affiliates

Section 7 of the EHR Regulation requires the Information Manager of the Alberta EHR to conduct an audit each month of the Alberta EHR information logs. The Provincial Logging and Audit Standard captures the data elements that have been listed above each time individually identifying information is accessed by an authorized custodian or their authorized users via Alberta Netcare.

Access to a patient's prescribed health information must be logged and be subsequently displayed in the appropriate fields in the audit reports described below. Per section 6 EHR Regulation, the following data elements must also be logged each time individually identifying information is accessed by an authorized custodian or their authorized users via an electronic health record information system:

- **User ID or application ID associated with an access**: This is a unique identifier for a user or application. This data element should be logged once during an access to a patient's record.
- **Name of user or application that performs an access**: This is the full name of a user that accesses a patient's record. In the case of system-to-system communication, this is the application name. This data element should be logged once during an access to a patient's record. For instance, if a user accesses a patient's record in PIN, the user's name should be logged once as long as the PIN session for that access stays alive no matter how long that session stays alive. This line of thought is used to describe logging requirements for subsequent data elements.
- **Role (or profession or occupation) of a user who performs an access**: This refers to the job function of a user performing an access. For instance, physician, pharmacist, nurse, etc. This data element should be logged once per access to a patient's record.
- **Date of access**: This refers to the day, month and year that a user or application performs an access. This should be logged once per access.
- **Time of access**: This refers to the hour, minute and second that an access is performed. This data element is logged each time an action is performed on a patient's record during an access. The time of access must be synchronized with local time.
- **Actions performed by a user during an access**: This may include one or a combination of the following: create, view, update or modify, delete, patient search, copy, print, etc. These data elements must be logged each time an action corresponding to any of the above is performed on a patient's record by a user during an access.

An Alberta Netcare Guide for Authorized Custodians and/or their Authorized Affiliates

- **Name of facility or organization of access**: This data element should be logged once per access to a patient's record.
- **Display Screen Number or Reference**: This refers to the user interface or application that was used by a user during an access, for instance, PIN. This data element should be logged once per access.
- **Stakeholder unique Identifier**: This data element should be logged once per access to a patient's record. The unique identifier does not have to be part of the logs as long as it can be displayed in the audit report when needed. Example of unique identifier includes medical record number (MRN) and personal health number (PHN). One of these identifiers needs to be displayed in the audit report as two or more patients whose records have been accessed can have similar names.
- **Stakeholder name**: This is the name of the patient whose information is being accessed. This field should be logged once per access to a patient's record. If it is possible to derive the stakeholder name from the PHN without affecting the efficiency of the logging application then the stakeholder name should not be logged.

Alberta Health conducts both random monthly audits from the generated user access log of all Alberta Netcare activity and on demand when requested by a custodian. Individuals can also submit an HIA Access Request to the Alberta Health FOIP office to obtain a copy of their audit log for a specific period of time so that they may find out who has been accessing their records in the EHR.

6.2.3 Masking of Health Information in ANP

In order to address the expressed wishes of individuals to limit access to their prescribed health information, information accessible via Alberta Netcare may be masked. For Albertans who wish to limit the use of their prescribed health information, authorized custodians or regulated health professionals (i.e. those with authority under s.56.3 HIA to make information accessible via the Alberta EHR) have a mechanism to mask health information called *Global Person-Level Masking* (GPLM). When an authorized custodian attempts to access prescribed health information about an individual who has made a masking request, only the first and last name, date of birth, gender and personal health number of that individual will be visible to that authorized custodian via Alberta Netcare. If approved, the mask is applied to an individual's health information made available through Alberta Netcare, in conjunction with an authorized custodian that the individual has a current care relationship with the Albertan. This process is facilitated by AHS.

An Alberta Netcare Guide for Authorized Custodians and/or their Authorized Affiliates

As Information Manager of the Alberta EHR, Alberta Health is responsible for establishing and communicating the formal GPLM process. Alberta Health has disseminated information on GPLM to Authorized Custodians who are participating in the Alberta EHR so they can respond to an individual's request for masking of their health information, and they are also responsible to communicate this information to Albertans.

Custodians can delegate affiliates who can authorize a masking request within their organizations. Affiliates must exercise due diligence and comply with their professional practice standards.

Note: The custodian retains responsibility for decisions made by affiliates to authorize, refuse and rescind GLPM within the organization. This authorization process requires that the custodian (or delegate) have the capacity to view the information in Alberta Netcare to make the appropriate decisions related to masking.

Should an Albertan in the care of a custodian or an affiliate ask for their EHR to be masked, and the custodian or an affiliate meets the requirements to authorize GLPM for the individual, the custodian or affiliate is asked to follow the "*Guideline for Application for Global Person-Level Masking*" document (located here: <https://portal.albertanetcare.ca/ab/NetcareLogin.htm>) and take the opportunity to discuss the benefits and drawbacks of masking with the patient. This includes discussing:

- what a mask is,
- the situations that warrant unmasking, and
- any other risks that may be associated with applying a mask.

The custodian or affiliate should also include a description of how their health information will be accessed for treatment and care purposes. In the event that the custodian or affiliate does not meet the requirements to authorize GPLM, the custodian or affiliate should direct the requesting individual to a custodian participating in the Alberta EHR with whom the patient has a current care relationship and who is able to authorize the masking.

Members of the public can obtain information on the GPLM process at this link <http://albertanetcare.ca/PatientPrivacy.htm>, which is specifically found under the Privacy and Security heading under the Alberta Netcare Information section of the Alberta Netcare website.

How GPLM Works.

When a mask has been applied, only demographic information displayed. The authorized ANP user sees an indicator that the data is masked. This user must then decide if this data is 'need to know' and, if it is, to unmask the data. The user must select the reason for the unmasking. This is referred to as "breaking the glass" and allows the prescribed health information to be viewed. There are six possible reasons for unmasking:

An Alberta Netcare Guide for Authorized Custodians and/or their Authorized Affiliates

- patient consent,
- direct patient care/clinical need,
- medical emergency,
- public health follow-up,
- authorized release of patient information, and
- as required by law.

The unmasking of health information is logged and subject to auditing, as are all viewings through ANP.

The Alberta Health HIA Help Desk¹ offers support to individuals who request their information be masked by providing information about the masking process and the authorized custodian's, or regulated health professionals, role in the process. The Alberta Health HIA Help Desk will follow up should the individual have difficulty engaging in the masking process. However, AHS provides the actual masking service on behalf of Alberta Health. Alberta Health is responsible to enable and maintain the setting of the mask in Alberta Netcare. All complete GPLM forms are handled by the AHS Edmonton Zone Patient Information Services which is responsible for the 'technical' aspects of adding and removing masking flags on behalf of Alberta Health. AHS administers GPLM for Alberta Health in accordance with operating agreements.

Requesting the Mask

Individuals wishing to request GPLM must contact an authorized custodian or regulated health professional with whom they have a current care relationship². The party receiving the request must complete the GPLM application form in consultation with the individual and then submit the application to AHS for processing.

Before submitting the application, the authorized custodian or regulated health professional must discuss the consequences of applying and rescinding a mask with the individual. Further, there may be circumstances in which a party is unable to authorize an individual's information to be masked - for example, if masking that information could pose a threat to public health and safety.

¹ The Health Information Act (HIA) Help Desk can be reached from 8:15 a.m. to 4:30 p.m. (Monday to Friday, excluding statutory holidays) at 780-427-8089, or toll free in Alberta by dialing 310-0000 then 780-427-8089; e-mail hiahelpdesk@gov.ab.ca

² Note - while Alberta Health is a custodian under HIA, Alberta Health does not participate in ANP as a health care provider. Alberta Health does not have a current care relationship with Albertans who are asking for their information to be masked so is not in a position to consider the best way to respond to an individual's request. Alberta Health provides direction on who to contact in AHS to request the mask. AHS is Alberta Health's service provider in this regard.

An Alberta Netcare Guide for Authorized Custodians and/or their Authorized Affiliates

Rescinding a Mask

An individual may also request that a mask be rescinded by contacting an authorized custodian or regulated health professional. A request to rescind a mask may also be initiated by a health services provider if he or she becomes aware of circumstances that affect an individual's eligibility for GPLM. In this case, authorized custodians/regulated health professionals or their delegates will make every attempt to inform the individual of their decision prior to removing the mask. Applications to rescind masks must also be submitted to AHS for processing.

6.2.4 Responding to Alberta EHR Privacy and Security Breaches

The Provincial Reportable Incident Response Process (PRIRP) has been designed to ensure that all health stakeholders are aware of all possible threats to health data and how to respond to a suspected or real threat. The PRIRP is owned and managed by Alberta Health Privacy and Security Unit. Custodians or individuals that suspect that the Alberta EHR has been inappropriately accessed can raise this concern with the Alberta Health HIA Policy, Privacy and Security Unit, which would trigger a breach investigation using the PRIRP.

An Alberta Netcare Guide for Authorized Custodians and/or their Authorized Affiliates

7 Streamlined Custodial PIAs

As a custodian, you are still responsible for your PIA requirements. Alberta Health has strived to assist custodians with this process, by allowing custodians to streamline their PIA submissions to the OIPC, when there is integration with the Alberta EHR. These processes have been implemented to ensure that access to the Alberta EHR is granted in a timely manner, once all established requirements have been met.

When You Have a Previously Accepted PIA

If you have a previous PIA that was accepted by the OIPC regarding your access to Alberta Netcare and it is less than two years old, you can submit a PIA Addendum to your previously accepted PIA, rather than submitting a new PIA that address systems integration with Alberta Netcare. When you do this, you need to:

1. Review your original accepted PIA to ensure that the information is still current and if not, you need to update the document accordingly;
2. Ensure that this PIA Addendum addresses how your system will integrate with Alberta Netcare. You can obtain an understanding of the major components of the EHRIS by reading the Alberta Health's document "**An Overview of Alberta's Electronic Health Record Information System**" (http://www.albertanetcare.ca/documents/An_Overview_of_Albertas_ERHIS.pdf)
3. If you previously completed a Provincial Organizational Readiness Assessment (pORA) as part of obtaining access to ANP, you should also review it and update it, if changes have occurred. You will have to complete "**Section Two: Mandatory Security Requirements for S2S Sites**" of the pORA and return it to Alberta Health for review and approval.

Once your PIA Addendum has received OIPC acceptance and Alberta Health has approved your revised pORA, your systems integration with Alberta Netcare can proceed.

When You Have Not Yet Submitted a PIA

If you have yet to submit a PIA, you need to do so before your system will be allowed to integrate with Alberta Netcare. To assist you, the OIPC has published a document titled "**Privacy Impact Assessment Requirements**",

http://oipc.ab.ca/media/615916/Guide_PIA_Requirements_2010.pdf.

When completing your PIA, you will have to:

1. Develop policies and procedures for your staff that outline your, and their, obligations from a privacy and security perspective under the *Health Information Act*.
2. Ensure that your PIA addresses how you will now be granted access to Alberta Netcare and how your system will integrate with Alberta Netcare. You can obtain an

An Alberta Netcare Guide for Authorized Custodians and/or their Authorized Affiliates

understanding of the major components of the EHRIS by reading the Alberta Health's document "**An Overview of Alberta's Electronic Health Record Information System**" (http://www.albertanetcare.ca/documents/An_Overview_of_Albertas_ERHIS.pdf)

3. Complete and submit a pORA, which includes a completed "**Section Two: Mandatory Security Requirements for S2S Sites**", once the OIPC has accepted your PIA, and returned it to Alberta Health for review and approval.

Note: You do not have to wait for the OIPC acceptance of your PIA to complete your pORA. You can complete it alongside of your PIA and have it ready for submission to Alberta Health for review and approval as soon as you receive OIPC acceptance of your PIA.

4. Upon having your pORA approved, you will need to sign an Information Manager Agreement with Alberta Health.

Once the Information Manager Agreement with Alberta Health has been signed, we will then authorize their access to Alberta Netcare and their systems integration with Alberta Netcare.

An Alberta Netcare Guide for Authorized Custodians and/or their Authorized Affiliates

8 Contacts

Physician Custodians	Contact the AMA for PIA assistance via their website: https://www.albertadoctors.org/4744.aspx
Pharmacist Custodians	Contact the RxA for PIA assistance by phone: 780-990-0326 or visit their website: http://rxa.ca/pharmacy-initiatives/pia-support.aspx
Nurse Custodians	Contact the CARNA for PIA assistance by phone: 1-800-252-9392 or visit their website: http://www.nurses.ab.ca/content/carna/home/professional-resources/professional-development/webinars/past-webinars/the-health-information-act-and-you.html
All Custodians	<p>Contact the Office of the Information and Privacy Commissioner (OIPC) if you have any questions regarding your PIA submission, by phone: 1-888-878-4044 or visit their website: http://oipc.ab.ca/home</p> <p>When the PIA has been accepted by the OIPC, contact an eHealth Consultant to move forward with the implementation of the Alberta EHR and the Alberta Netcare Portal by phone: 1-855-643-8649; by fax: 1-844-630-0877; or email: health.ehrdeployment@gov.ab.ca</p> <p>Alberta Health HIA Policy, Privacy and Security Unit can be reached via the Alberta Health HIA Help Desk by phone: 780-427-8089 or email: hiahelpdesk@gov.ab.ca.</p>

An Alberta Netcare Guide for Authorized Custodians and/or their Authorized Affiliates

List of Acronyms

AHS	Alberta Health Services
Alberta EHR	Alberta Electronic Health Record
AMA	Alberta Medical Association
ANP	Alberta Netcare Portal
CARNA	College and Association of Registered Nurses of Alberta
EHRDSC	Electronic Health Record Data Stewardship Committee
HIA	Health Information Act
IEP	Information Exchange Protocol
IM	Information Manager
IMA	Information Manager Agreement
NCR	Netcare Clinical Repository
OIPC	Office of the Information and Privacy Commissioner
PCR	Provincial Client Registry
pHIE	Provincial Health Information Exchange
PIA	Privacy Impact Assessment
PIN	Pharmaceutical Information Network
pORA	Provincial Organizational Readiness Assessment
PPMS	Pharmacy Practice Management System
PSV	Pharmacy System Vendors
RxA	Alberta Pharmacists' Association
S2S	System to System
SHR	Shared Health Record