



The *Alberta Medical Association* (AMA), College of Physicians and Surgeons of Alberta (CPSA), and Alberta Health (AH) identified the need for a frequently asked question (FAQ) document to explain the CII initiative and its implications, particularly to community physicians.



What is the CII initiative?

The primary goal of CII is to improve Albertan's continuity of care across the health system through better access to primary care and community health information. To achieve this goal CII will:

- collect health data from all primary care and community clinics in Alberta
- present this data in Alberta Netcare through clinically relevant reports
- make this data available to Alberta Health for secondary use

The vision for Alberta Netcare is for it to function as a comprehensive, patient-focused application. The community-based physician uses Alberta Netcare to access patient health information from other health-care providers (e.g. medication information, laboratory test results, diagnostic images and hospital visits). Healthcare providers, however, do not have access to patient information that is recorded in the community physician's EMR (e.g. diagnosis, immunizations, allergies, blood pressure, height and weight). Alberta Health's data analytics team requires primary care and community health information for effective health systems planning and quality program improvement efforts. The CII initiative will address this information gap.



What information will participating community clinics be contributing?

Information to be included in Alberta Netcare will be data elements in the community physician's EMR that are set out in the Health Information Standards Committee for Alberta (HISCA) EMR Data Content Standard (<http://www.health.alberta.ca/documents/HISCA-PHC-EMR-Content.pdf>). This includes patient identifier (PHN), birthdate, gender, provider name, role, expertise, clinic location, diagnosis, clinical observations (immunizations, allergies, blood pressure, height, weight, etc.). Additionally, the CII initiative will make specialist consult reports available to other care providers through Alberta Netcare. Future phases of the CII project will expand the scope of information sharing, including more data elements and additional clinical reports.



Will specialists be contributing the same information as family physicians?

Community specialists will be asked to provide the same EMR data as family physicians, but this is not required during the current phase of the project. The current focus is on getting consult reports into Alberta Netcare.



What is a Community Encounter Digest (CED) report?

The first report will be a CED report that summarizes the care the patient has received over the past year from community-based clinics. This includes details on the following:

- Service providers
- Service delivery location
- Encounter (details)
- Observations (measurements and others)
- Interventions and treatment
- Referral requests
- Immunizations



Who designed the Community Encounter Digest and can it be changed?

The CED was designed by a clinical workgroup that included physicians from the AMA and CPSA. Based on consultations with physicians and other clinical stakeholders, additional data elements may be added in the future.



May we enter a report from Netcare (CED or other report) that was generated from another clinic into our clinic EMR or patient chart?

The HIA allows authorized custodians to access health information in Netcare essential to the treatment and care of their patients. Authorized custodians exercise control over the health information that is available to them through Netcare. As such, authorized custodians may enter health information from Netcare that was generated at other clinics into their own EMR or patient chart, as long as the information is relevant and essential to the treatment and care they are providing to the patient. Affiliates to authorized custodians should consult their site's policies and procedures on charting Netcare information and/or consult the relevant custodian before proceeding.



May we disclose reports from Netcare (CED or other report) that were entered into our own charts from Netcare?

If an authorized custodian puts information from Netcare into their own EMR system or patient chart, it becomes a part of their records, over which they exercise custody and control as a custodian. This means that the custodian may decide to disclose the Netcare information to a third party if the disclosure is authorized under the HIA.



Will community clinics get access to the data they shared?

Yes, clinics will be able to see the data reflected in the reports published to Alberta Netcare during the limited production roll out data validation process.



What is Alberta Health planning to do with the information community clinics provide?

Alberta Health, in consultation with AMA, CPSA, and other clinical partners, plans to use this information for appropriate data analysis purposes. This will include population health assessment, health system planning, quality improvement and research at the primary care level.



What if I want to share additional information?

If the physician adds new information to the encounter for that patient, the new information will be picked up in the next nightly EMR data extract and be added to the information in Netcare. As well, in consultation with the AMA, CPSA and other clinical stakeholders, additional data elements and reports will be incorporated in the future.



What is the legal authority that allows disclosure of health information to Alberta Health?

The physician's disclosure of health information to Alberta Health is authorized under section 27 of the Health Information Act (HIA) for the following purposes:

- providing health services;
- planning and resource allocation;
- health system management;
- public health surveillance; and
- health policy development.

Under the provisions of section 35(1)(a) and 36(a) of the HIA, this information can be disclosed without patient consent.



What is the legal authority that allows disclosure of health information to other health service providers through Alberta Netcare?

The disclosure by Alberta Health to Alberta Netcare is covered under HIA section 35(1)(b) and 36(a) and is subject to the requirements of section 58(2) whereby if a patient asked his/her physician to limit the amount of health information that the physician discloses, the physician must consider these expressed wishes. The physician must then apply his/her professional judgment and weigh the patient's concern with any other important factors, such as patient safety, whether the information could be important to another provider, legal requirements, professional college standards and other factors. The physician must make a decision on what and whether to disclose the information and should tell the patient what the decision is.



What if a patient does not want his/her information shared?

Patients have the right to ask their physician to limit the amount of health information that they disclose. The physician must apply their professional judgment and weigh the patient's concern with any other important factors, such as patient safety, the potential importance of that information to another health care provider, legal requirements, professional college standards and other factors. The physician must make a decision and should tell the patient what their decision is. It is a best practice to document the decision in the EMR. Dependent on the decision reached by the physician and the capabilities of the physician's EMR, a particular encounter can be marked as confidential. In this case, the information will not be displayed in Netcare. The physician can also choose **not** to make a specialist consult report available to Netcare.



Will my clinic EMR Privacy Impact Assessment (PIA) need to change?

Alberta Health is preparing a PIA that will cover changes made to clinic EMR systems to accommodate disclosure of health information to CII. A synopsis of the Alberta Health PIA will be provided to custodians along with an endorsement letter that states that the custodian has been made aware of the changes to his/her EMR in support of the data extraction process. The endorsement letter indicates to the Office of Information and Privacy Commissioner that the physician/custodian's EMR and the PIA covering it are amended and that the Alberta Health PIA reflects these changes and the security measures taken to protect health information as a result of the changes.



What privacy and security protections are in place for the data being shared?

Data is being transferred from the EMR vendor's hosting site to the Alberta Health data centre via a dedicated web service that uses strong encryption.

Data from the Alberta Health data centre goes to Alberta Netcare clinical repositories and to Alberta Health analytic environment through a virtual private network (VPN) that uses strong encryption.

The Alberta Health data centre meets high standards of data security with firewalls, intrusion detection, anti-malware systems and redundancy of power supply and hardware to ensure high availability and data integrity.



How will physicians know if this initiative is worth participating in?

The Health Quality Council of Alberta (HQCA) will be conducting an independent evaluation of the CII initiative. Alberta Health, the AMA and the CPSA will also be providing feedback to community physicians based on the results of the evaluation.



If a community clinic wants to participate, what is involved?

To participate, your clinic needs to be on Alberta Netcare already and have an EMR privacy impact assessment (PIA) and provincial Organizational Readiness Assessment (pORA) that reflects the current environment. Signing up is simple.

For further information, please contact us at:

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