

### Information Management Agreement (IMA) and Information Exchange Protocol (IEP)

#### What is an IMA and an IEP?

The Information Manager Agreement (IMA) is a legal agreement between Alberta Health (the Information Manager for the Alberta Netcare) and the participating New Authorized Custodians. It governs the custodian's access to Alberta Netcare and establishes the terms, conditions and restrictions under which this access is granted. Custodians must agree to the terms and sign the IMA in order to receive access. By signing the IMA, custodians and the Information Manager agree to abide by the rules of the Information Exchange Protocol (IEP).

The IEP establishes the specific rules for the collection, use and disclosure of information through Alberta Netcare. These rules bind all signatories. It is the responsibility of each custodian to ensure they fully understand their obligations under the HIA as well as the obligations identified under the IEP. It is the HIA, not the IEP which empowers custodians to collect, use or disclose health information.

Within Alberta Health, it is the HIA Policy, Privacy and Security Unit that is responsible for the management of the IMA, IEP and HIA documentation.

#### What are Custodian responsibilities in the IMA and IEP Process?

The New Authorized Custodian will receive a copy of the IEP. The IEP outlines specific rules for the collection, use and disclosure of information through Alberta Netcare.

After reviewing the IEP, the IMA must be read, signed and dated by the New Authorized Custodian and returned to the HIA Policy, Privacy and Security Unit of Alberta Health. This unit must receive the signed IMA before access will be granted to Alberta Netcare.

#### What are the main elements of an IMA and IEP?

The summaries below provide a general outline for the IMA and IEP.

#### Summary of IMA Content:

Summary highlights of selected sections of the IMA are presented in the following table.

Appointment of Information Manager	Establishes Alberta Health as the Information Manager for Alberta Netcare.
Compliance with IEP & HIA	Establishes the IEP as a part of the agreement. Confirms requirement to comply with the HIA.
Responsibilities of Custodian & Information Manager	Describes obligations of both the Information Manager and the participating custodian with respect to Alberta Netcare. Includes obligations to limit access to appropriately authorized persons and to preserve accuracy and protect confidentiality of information accessed through Alberta Netcare.
Commercial User Prohibited; Exception for Pharmacy	Alberta Netcare may not be used for commercial purposes. There is an exception for use in the practice of pharmacy as defined in the Health Professions Act.
Exclusion of Liability	Custodian uses Alberta Netcare at its own risk; information is provided "as is" and is no substitute for professional judgment.
Liability & Indemnity	The custodian and the Information Manager agree to be liable to and hold each other harmless from any claims resulting from: any breach of the HIA, the IMA or the IEP, any unauthorized access, exchange, collection, use or disclosure of information.
Suspension & Termination	The Information Manager can suspend the custodian's access or terminate access for breach. The custodian can terminate the agreement by withdrawing its access to Alberta Netcare.

#### IMA Tips and Tricks

Before signing the IMA, be sure to read the document. It is a legal document that requires your signature. Be sure to fill in all fields on the IMA including the date before mailing the original document to Alberta Health (address provided in the IMA). Do not send a photocopy of the signed IMA — it will be rejected.

## Summary of IEP Content:

The IEP is a document establishing specific rules for the collection, use and disclosure of information through Alberta Netcare. It is organized into three large sections, each broken into sub-sections. Summary highlights of selected sections are presented in the following table.

#	Title	Content Summary
<b>A</b>	<b>Document Overview</b>	Includes Purpose, History, Authorship, Guiding Principles and Limitations
<b>B</b>	<b>Terms User in This Document</b>	Includes terms defined in the document and terms defined in the HIA
<b>C</b>	<b>Rules</b>	
1.0	Protection of Alberta Netcare Information	Includes: <ul style="list-style-type: none"> <li><b>Authority of the IEP</b> <ul style="list-style-type: none"> <li>applies only to Alberta Netcare, not to records held outside of Alberta Netcare</li> <li>deference to the HIA</li> </ul> </li> <li><b>Operation of the IEP</b> <ul style="list-style-type: none"> <li>includes general responsibilities of custodians, affiliates, EHR Data Stewardship Committee and Information Manager (AHW)</li> </ul> </li> </ul>
2.0	Sources of Information	Includes: <ul style="list-style-type: none"> <li><b>Information from Clinical Data Repositories</b> <ul style="list-style-type: none"> <li>origins of information will be maintained by the Information Manager</li> </ul> </li> <li><b>Rules for Entry of Information Through Alberta Netcare</b></li> </ul>
3.0	Use of Information in Alberta Netcare	Includes: <ul style="list-style-type: none"> <li><b>For the Provision of Health Services</b></li> <li><b>By the Information Manager</b></li> <li><b>For Practice Self Audits</b></li> </ul>
4.0	Secondary Disclosures of Individually Identifying Information	Includes rules for disclosure: <ul style="list-style-type: none"> <li><b>To an Individual Who is the Subject of the Information</b></li> <li><b>For the Provision of Health Services</b></li> <li><b>To Health Professional Bodies</b></li> <li><b>For Research</b></li> <li><b>To other Persons Not Covered Above</b></li> </ul>

5.0	Other General Provisions	Includes: <ul style="list-style-type: none"> <li><b>Masking of Information</b> <ul style="list-style-type: none"> <li>what can be masked</li> <li>process for masking</li> <li>authority of custodian and Information Manager to unmask information</li> <li>authority to rescind masking</li> </ul> </li> </ul>
6.0	Information Security	Includes: <ul style="list-style-type: none"> <li><b>User Access Management</b> <ul style="list-style-type: none"> <li>role of custodian in identifying affiliates who should have access</li> <li>responsibilities of custodian</li> <li>conditions under which access may be revoked</li> </ul> </li> <li><b>System Access Management</b> <ul style="list-style-type: none"> <li>Information Manager's responsibility for surveillance and monitoring of system access</li> <li>Information Manager's responsibility to report to the EHR Data Stewardship Committee</li> </ul> </li> </ul>
7.0	Protocol Compliance & Enforcement	Includes: <ul style="list-style-type: none"> <li><b>Investigations and Audits Enforcement</b></li> </ul>

## Key Contacts

### HIA Help Desk

For more information about the IMA or IEP:

Phone: 780-427-8089 (Toll free in Alberta 310-0000)

Email: [hiahelpdesk@gov.ab.ca](mailto:hiahelpdesk@gov.ab.ca)

### eHealth Netcare Support Services

To move forward with the implementation of Alberta Netcare:

Phone: 1-855-643-8649

Email: [ehealthsupport@cgi.com](mailto:ehealthsupport@cgi.com)