



This quick reference outlines the steps that custodians must follow to complete the expedited Privacy Impact Assessment (PIA) process required for obtaining Alberta Netcare Portal (ANP) access.

Purpose

Under the *Health Information Act* (HIA), custodians must submit a PIA to the Office of the Information and Privacy Commissioner (OIPC) prior to implementing administrative practices and information systems relating to the collection, use or disclosure of individually identifying health information. A PIA must also be submitted before making any changes to those practices or systems. Since accepting the Alberta Health ANP PIA in 2006 and again in 2013, the OIPC has agreed to allow authorized custodians to follow an expedited ANP PIA process.

If you have questions or need assistance, contact eHealth Services.

eHealth Services Provider Support

1-855-643-8649 (toll free)
eHealthProviderSupport@gov.ab.ca

Resource Materials

- [Summary of Expedited PIA Process for ANP](#)
- [ANP PIA \(OIPC file H3879\)](#)
- [OIPC ANP PIA Custodian Cover Letter Template](#)
- [Overview of Alberta's Electronic Health Record Information System \(EHRIS\)](#)

Requirements

Through the expedited PIA process, custodians must refer to Alberta Health's ANP PIA and submit the following:

- 1 A formal OIPC cover letter that endorses the ANP PIA (OIPC file #H3879) and includes an acknowledgement that the custodian:

- Has met all of the privacy and security requirements stated within the ANP PIA.
 - Understands their obligation to provide a copy of their ANP PIA acceptance letter from the OIPC to the eHealth Services team within **8 months** of submission. If Alberta Health does not receive this confirmation, it reserves the right to suspend the custodian's access to ANP.
 - Understands that they are responsible for submitting a PIA amendment to OIPC if there is a change to their current practice or information system. In this case, the expedited PIA process is not sufficient to meet their PIA obligations under HIA.
- 2 A copy of their practice's policies and procedures. These policies should facilitate compliance with the HIA and include a description of the facility's organizational privacy management structure.

Steps

- 1 Review the ANP PIA (OIPC file #H3879).
- 2 Review the document "[Summary of the Expedited PIA Process for ANP.](#)"
- 3 The custodian must ensure their organizational management procedures reflect their college's standards of practice and the HIA requirements addressing health information management and protection.
- 4 Individualize the OIPC ANP PIA Custodian Cover Letter template.
- 5 Mail the following individualized documents to the OIPC:
 - OIPC ANP PIA Custodian Cover Letter
 - HIA Policies and Procedures that include documentation regarding the organizational privacy management at their site
- 6 Send an email to eHealth Services confirming that the custodian's ANP PIA has been sent to the OIPC, attaching a scan of the signed cover letter. The eHealth Services team will then

proceed with the next steps in providing access to Alberta Netcare via ANP.

- 7 Once the OIPC sends a PIA acceptance letter to the custodian, provide a scanned copy of the acceptance letter via email to eHealth Services. If the OIPC does not accept the custodian's ANP PIA, or the custodian does not provide confirmation of acceptance within 8 months of submission, Alberta Health reserves the right to terminate the custodian's ANP access.

PIA acceptance letters: When a custodian submits a PIA to the OIPC, the OIPC acknowledges receipt of the PIA by letter. This initial correspondence is *not* an acceptance letter. The OIPC then completes its review of the PIA by sending an "acceptance letter." The normal order of OIPC correspondence is as following:

- a Custodian submits PIA to OIPC
- b OIPC acknowledges receipt of PIA – please share the acknowledgement letter with the eHealth Services team.
- c OIPC may write to the custodian to ask questions about the PIA.
- d Custodian responds to OIPC questions, if any.

NOTE

While most ANP PIAs are accepted routinely without questions, if the OIPC contacts the custodian with questions, a response is required before the PIA can be accepted. Contact the eHealth Services team for assistance with responding.

- e Once the OIPC is satisfied with custodian's answers, OIPC sends PIA acceptance letter to custodian. The acceptance letter should contain text that reads, "I have completed my review and accept your PIA." Send a copy of this acceptance letter to the eHealth Services team **within 8 months** of submission.