

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 summary document is meant to assist custodians' Privacy Impact Assessments (PIA) or PIA Addendum be accepted by the Office of the Information and Privacy Commissioner (OIPC) and to make each Custodian aware of their custodial responsibilities regarding Alberta Netcare Portal (ANP) access.

How to Address Your Systems Electronic Integration with Alberta EHR

As a custodian you are fully responsible and accountable for being compliant with your obligations and responsibilities regarding integration with the Alberta EHR. You can reference specific information within the "Alberta Netcare Documents" section of this summary document for inclusion in your PIA or PIA Addendum that addresses your systems integration with Alberta Netcare. To assist you, in learning your responsibilities, you can access and read the documents that are referenced in the "Your Custodial Responsibilities for ANP Access" section of this summary document.

When you submit your PIA or PIA Addendum that address systems integration with Alberta Netcare to the OIPC for review, comment and subsequent acceptance, your cover letter should state:

- That your PIA or PIA Addendum addresses systems integration with Alberta Netcare;
- That you are aware of what previous work has been undertaken to allow for systems integration with Alberta Netcare; and
- That you understand your custodial responsibilities regarding ANP access.

When You Have a Previously Accepted PIA

If you have a previous PIA that was accepted by the OIPC <u>regarding your access to Alberta</u>
<u>Netcare</u> and it is <u>less than two years old</u>, 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;
- 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)

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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/Content Files/Files/PIAs/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*.
- 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
 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)
- 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.

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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 Enterprise 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 document titled "An Alberta Netcare Guide for Authorized Custodians and/or their Authorized Affiliates"

(http://www.albertanetcare.ca/documents/Netcare Guide for Authorized Custodians.pdf) provides:

- Clarity to authorized custodians who may approve their affiliates' access to Alberta Netcare;
- Privacy and security safeguards to implement for the Alberta Netcare, and to;
- Assist authorized custodians to identify their custodial roles and responsibilities.

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.

Alberta Health has also created this summary sheet, "Your System Integration with Alberta Netcare" to assist you to get your PIA or PIA Addendum accepted by the OIPC; and to make you aware of your custodial obligations and responsibilities regarding ANP access.

Your Custodial Responsibilities for ANP Access

When a custodian wishes to integrate their system with Alberta Netcare, they must have an understanding about their custodial responsibilities regarding ANP access. These custodial responsibilities include:

- Authorizing user permissions for Alberta Netcare;
- Training Users;
- Responding to Breaches;

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- Access and Correction Requests;
- Audit Logs;
- Masking of Health Information in ANP; and
- Responding to Alberta Netcare Privacy and Security Breaches.

Specific information on these responsibilities can be located in the document titled "An Alberta Netcare Guide for Authorized Custodians and/or their Authorized Affiliates" (http://www.albertanetcare.ca/documents/Netcare Guide for Authorized Custodians.pdf)

For Additional Information:

eHealth Support Team Alberta Health HIA Policy, Privacy and Security Unit

Phone: 1-855-643-8649 (via Alberta Health HIA Help Desk)

Fax: 1-844-630-0877 Phone: 780-427-8089

E-mail: health.ehrdeployment@gov.ab.ca E-mail: hiahelpdesk@gov.ab.ca

Office of the Information and Privacy Commissioner

Phone: 1-888-878-4044 or 780-422-6860

E-mail: generalinfo@oipc.ab.ca

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