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RM&R Privacy and Security Program

The RM&R Solution is a shared web-based system containing personal health information in the form of referrals. The system is used to match patients to appropriate clinical programs/services and send electronic referrals. Currently, 86 acute, rehabilitation, complex continuing care, home care, long-term care and community support health service providers in the regions use the RM&R within the Toronto Central and Central LHINs in Ontario.

As of 2008 in the Toronto Central LHIN and 2011 in the Central LHIN clinicians are able to access data in RM&R and view the personal health information in it. See a list of participating organizations and the types of personal health information being captured in the information system.

How is Patient Health Information Used and Protected?

Patient's referral information is made available to participating healthcare organizations for the purpose of providing the patient with healthcare and treatment, or to reduce a significant risk of serious bodily harm. All healthcare organizations involved in the RM&R Solution handle a patient's personal health information securely and confidentially, in accordance with Ontario's health privacy law (Personal Health Information Protection Act, 2004), other applicable laws, and the RM&R Privacy and Security Policies and Procedures. For more information please see the Keeping Personal Health Information Confidential and Secure.

Who Operates the RM&R Program?

The University Health Network (UHN) operates the RM&R Solution on behalf of the Toronto Central LHIN and acts as the Health Information Network Provider (HINP) for RM&R. The term Health Information Network Provider (HINP) is defined in the Personal Health Information Protection Act, 2004. As the HINP for RM&R, UHN provides services that allow personal health information to be shared electronically by:

- Managing and operating the RM&R Program and information system;
- Assessing the privacy and security of the information system to help ensure that it protects personal health information;
- Operating the RM&R Privacy and Security Program in cooperation with participating healthcare organizations, including communicating directly with individuals about privacy or security questions or complaints;
- Developing and managing some of the technology needed to support the information system; and
- Managing service providers who built and support the information system.

When the University Health Network provides these services, it has access to the personal health information in the information system. It only uses personal health information to perform these services to healthcare organizations and does not disclose the personal health information to any other healthcare organizations.

The University Health Network is also a healthcare organization that will be able to view personal health information to provide treatment and care like any other healthcare organization that is participating.

Patient Privacy Rights

Patients can contact RM&R or any healthcare organization participating in RM&R for any privacy and security questions or complaints. Please refer to the contact information at the end of this page.

A patient would likely contact their healthcare organization for the following privacy-related reasons:

Consent and Blocking a Patient Record

Healthcare organizations may use and share patient personal health information for treatment and care. All healthcare organizations that use and share patient personal health information in the information system have signed agreements confirming that they follow RM&R's Privacy and Security Policies and Procedures and Ontario's health privacy law.

Patients can opt out of having personal health information used and shared by healthcare providers by putting a block on personal health information. The RM&R Program provides the option of restricting all healthcare providers from using or sharing personal health information. Patients who would like to have their information in RM&R restricted should contact their healthcare organization to make the request.

Viewing or Obtaining a Copy of Personal Health Information

Patients have a right to request to see or obtain a copy of the following:

- The patient's personal health information in the information system
- A list of healthcare professionals who have viewed a patient's personal health information in the information system
- A list of times that a patient has put or removed a block on personal health information

Patients who would like to view or obtain a copy of their information in RM&R should contact their healthcare organization to make the request.

Correcting Personal Health Information

Patients have a right to ask that their personal health information be corrected if they feel it is out-of-date or inaccurate. Patients who would like to make a correction to their information should contact their healthcare organization to make the request.

Questions or Complaints about RM&R's Practices

Everyone has a right to ask questions or make a complaint about how RM&R handles personal health information or privacy. Individuals who would like to ask a question or make a complaint about RM&R's practices can do so either to their healthcare organization or directly to the RM&R program.

Contact Information

The most secure way to contact RM&R is by phone or mail. Patients may choose to email RM&R, but the security of email messages is not guaranteed. Messages may be forged, forwarded, or seen by others using the internet. **Please note:** Patients should not use email to discuss sensitive information, or use email in an emergency since it may be delayed.

Telephone: 416-340-4030 (local) or 1-844-653-1240 (toll-free)

Mailing Address:

RM&R Privacy Office
c/o RM&R Program Office
University Health Network
20 Dundas Street West, 3rd Floor
Toronto, ON M5B 1R4
Email: referrals@uhn.ca

Personal Health Information in the RM&R Solution

The following types of information are stored in the information system. This list will be updated from time to time as new types of information are added into the information system, but may not represent a complete list of all types of PHI captured through the RM&R Solution.

Not all of the healthcare organizations using RM&R provide all of the information described below. Some may only provide some of the personal health information types.

Personal Health Information Type	Description or Examples	Purpose of Storing the Personal Health Information
Demographics	<ul style="list-style-type: none"> • Name • Gender • Health Card Number Information • Supplementary Health Card Information • Client ID • Date of Birth/ Age • Marital Status • Patient Phone Number • Permanent Address (including postal code, telephone number, treatment address) • First Nations • Next of Kin • Faith and Religion • Ethno-cultural Preference • Medical Record Number 	Identify patient and link their personal health information from multiple healthcare organizations
Patient Social Information	<ul style="list-style-type: none"> • Social Situation Details • Living Situation • Preferred Accommodation • Emergency Contact • Alternate Contacts (POA Personal Care and Financial Affairs, SDM, non-legal contacts) • Primary Language • Interpreter Required • Preferred Language • Family Aware of Diagnosis/ Prognosis 	Providing treatment and care
Financial Information	<ul style="list-style-type: none"> • Health Insurance Information • Responsibility for Payment (e.g. OHIP, Insurance Plan) 	Providing treatment and care
Health Care Provider Information	<ul style="list-style-type: none"> • Community Primary Health Care Providers • Physician Information (Hospital) • Family Physician Information (Community) • Pharmacy Information • Last Visit Information • Referred By Information 	Ability to acquire more patient information to provide treatment and care
Relevant Medical	<ul style="list-style-type: none"> • Precautions/ Risks (to patient and/or provider) • Occupational History 	Providing treatment and care

History	<ul style="list-style-type: none"> • Surgical History • History of Falls Information 	
Current Condition	<ul style="list-style-type: none"> • Physical and Mental Health, Surgical, Family, Social Condition • Drug Sensitivities, Allergies, Addictions • Infection Control • Current Medications • Current Treatments/ Special Needs • Current Diet • Vision Information • Hearing Information • Speech Information • Respiratory Information • Mobility/ Ambulation Information • Height • Weight • Medical Health Report 	Providing treatment and care
Relevant Diagnosis	<ul style="list-style-type: none"> • Primary Diagnosis • Cancer Diagnosis • Co-morbidities • Palliative Performance Scale • Chronic Pain • Alzheimer, Dementia Diagnosis 	Providing treatment and care
Visit/ Encounter Details	<ul style="list-style-type: none"> • Reason for Referral • Date of Referral • Service Requested (e.g. Community, CNAP) • Urgency Requirements of Admission • Services Currently Receiving • Estimated Date of Discharge/ Discharge Date • Goals of Care (e.g. convalescent care goals, rehabilitation goals) • Medical Order • Medication Administration Information • Wound Care • FARM Status • Client Choice Information • Resuscitation Status • Special Care Needs • Rehab/ CCC Population Requested (e.g. ABI, Amputee, Burns) • Alternate Level of Care Status Information 	Providing treatment and care
Allied Health Information	<ul style="list-style-type: none"> • Dietitian Report (nutrition history, nutrition intervention, goals of nutrition care) • Nursing Intervention Information • Occupational Therapy (functional status, suggested community goals) • Physiotherapy Report (surgical procedure, home therapy program, ambulation details) • Social Work Intervention Information • Speech Language Pathology Information (communication and/or swallowing disorders, hearing, assessments, therapy) 	Providing treatment and care

Mental Health and Addiction Information	<ul style="list-style-type: none"> • Substance abuse History • Psychiatric History • Mental Health and Addiction Services 	Providing treatment and care
Special Care Needs	<ul style="list-style-type: none"> • Tracheostomy • IV • Oxygen • Enteral Feed • Dialysis • Equipment Needs • Bladder Management • Bowel Management • Ostomy • Feeding Requirements • Dietary Needs 	Providing treatment and care
Diagnostic Imaging Information	<p>Doctor's notes on images such as x-rays, MRI, CT scan</p> <ul style="list-style-type: none"> • Chest X ray (date, result, action taken) 	Providing treatment and care
Assessments	<ul style="list-style-type: none"> • Smoking Assessment • Behavioral Assessment • Symptom Assessment (Edmonton Symptom Assessment System score) • Functional Assessment • Respiratory Assessment • Excretion Assessment • Cognitive Status (Rancho Los Amigos Cognitive Scale Score) • Ambulatory Status • Weight Bearing Status • Assessment of Patient Capability • Palliative Performance Scale 	Providing treatment and care
Consent Directives	<p>A patient's instructions to block healthcare providers and staff from viewing their personal health information in the information system</p> <ul style="list-style-type: none"> • Implied/ expressed consent for CNAP application • Consent for placement to Convalescent Care • Consent for placement to Long Term Care • Consent/ Evaluator Questionnaire (Capacity Assessment) 	Block a healthcare provider from viewing a patient's personal health information at their request
Eligibility for Admission	<ul style="list-style-type: none"> • Eligibility for Convalescent Admission Assessment • Eligibility for Long Term Care Admission Assessment • Eligibility for Respite Care Admission Assessment 	Providing treatment and care

More Questions?

For more information on RM&R Privacy and Security, please contact us.

RM&R Participating Organizations

Sector	Organization Name
<p>Acute Care</p>	<p>Baycrest Bridgepoint Health Central Community Care Access Centre Centre for Addiction and Mental Health Humber River Regional Hospital Markham Stouffville Hospital Mount Sinai Hospital North York General Hospital Providence Healthcare Runnymede Healthcare Centre Salvation Army Toronto Grace Health Centre Southlake Regional Health Centre Stevenson Memorial Hospital St John’s Rehabilitation Hospital St Joseph’s Health Centre St Michael’s Hospital Sunnybrook Health Sciences Centre Toronto Central Community Care Access Centre Toronto East General Hospital Toronto Rehabilitation Institute University Health Network West Park Healthcare Centre Women’s College Hospital York Central Hospital</p>
<p>Long-Term Care (LTC)</p>	<p>Baycrest Centre Belmont House Castlerview Wychwood Towers Chester Village Home for the Aged Christie Gardens Copernicus Lodge Dr. Paul & John Rejai Centre Elm Grove Living Centre Fairview Nursing Home Ltd. Fudger House Garden Court Nursing Home Hellenic Home for the Aged Heritage Nursing Home Isabel & Arthur Meighen Manor Ivan Franko Home Kensington Gardens Lakeshore Lodge Lakeside Long Term Care Centre Leisureworld Caregiving Centre - St. George Leisureworld O’Connor Court Leisureworld O’Connor Gate</p>

	<p>Lincoln Place Nursing Home Maynard Nursing Home Mon Sheong Home for the Aged Nisbet Lodge Norwood Nursing Home Providence Centre Rose of Sharon St. Clair O'Connor Suomi Koti Nursing Home The O'Neil Centre True Davidson Acres Vermont Square Versa-Care Centre Wellesley Central Place West Park Long Term Care White Eagle Nursing Home</p>
<p>Community Support Service (CSS)</p>	<p>Alzheimer Society of Toronto Better Living Health & Community Services Community Care East York Central Neighbourhood House Dixon Hall East York Meals on Wheels Etobicoke Services for Seniors Family Service Toronto Good Neighbours' Club Greek Social Services Harmony Hall Centre for Seniors Hospice Toronto Humber Community Seniors' Services Les Centres D'Accueil Heritage Mid-Toronto Community Services Native Canadian Centre of Toronto Neighbourhood Link Support Services Parkdale Golden Age Foundation Philip Aziz Centre Second Mile Club of Toronto SPRINT St. Christopher House St. Clair West Services for Seniors St. Stephen's Community House Storefront Humber True Davidson Meals on Wheels Warden Woods Community Centre West Toronto Support Services for Seniors WoodGreen Community Services Yorkminster Park Meals on Wheels</p>

RM&R Privacy & Security Policies and Procedures

The RM&R Program has developed policies and procedures to protect the privacy and security of personal health information. All healthcare organizations participating in the RM&R Program agree to the RM&R Privacy and Security Policies and Procedures provided below.

Privacy Policies & Procedures [NTD: The below policy titles link to PDF versions of the policies]

PS.Pol.001 – Privacy Policy

PS.Pol.002 – Access and Correction Policy

PS.Pol.003 – Consent Management Policy

PS.Pol.004 – Inquiries and Complaints Policy

PS.Pol.005 – Logging and Auditing Policy

PS.Pol.006 – Privacy Breach Management Policy

PS.Pol.008 – Retention Policy

Security Policies & Procedures

PS.Pol.101 – Information Security Policy

Policies and Procedures Shared between Privacy and Security

PS.Pol.007 – Privacy and Security Training Policy

PS.Pol.009 - Assurance Policy

Keeping Personal Health Information Confidential and Secure

The RM&R Program keeps personal health information safe with controls including:

Administrative Controls

- The Privacy and Security Working Group (made up of the healthcare organizations participating in RM&R) oversees the privacy and security programs.
- Privacy and Security Leads for the RM&R Program ensure that there are privacy and security programs in place to protect personal health information.
- Healthcare organizations must ensure that their healthcare providers are informed of their duties.
- Agreements, policies, and procedures define each organization's role in protecting the personal health information. They also define the roles of any people working for the organization or service providers who provide the healthcare organizations with services.
- Privacy and security assessments are conducted to identify new risks to privacy and security when the Privacy and Security Working Group or RM&R Executive Committee feels that there is a significant enough change to the RM&R Program or information system.
- The RM&R Program notifies healthcare organizations of any unauthorized access to personal health information that the healthcare organization put in the information system.

Physical Controls

- The personal health information is stored in a data centre with cameras, restricted access, alarms, and 24/7 security.
- When servers are no longer needed, the hard disks storing the personal health information are physically destroyed or permanently erased.
- Information is not physically removed from the data centre.

Technical Controls

- Only approved healthcare providers and staff that support them can view the information.
- Everyone needs a password to access the personal health information.
- The actions of everyone who views the personal health information is recorded electronically.
- All data is transmitted via a secure encrypted channel.
- The network is monitored to identify anyone trying to hack into it.
- All actions in the information system are logged so that the privacy officers of the healthcare organizations are able to monitor and audit their healthcare providers and staff who view personal health information in the information system.