

Handbook for Site Privacy Officers



echartmanitoba.ca

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Privacy Officer role and responsibilities

1.1 Role

Privacy Officer	<p>The Privacy Officer is responsible to:</p> <ul style="list-style-type: none">• Attend the mandatory eChart Manitoba Privacy Officer orientation session.• Ensure all site staff have received PHIA orientation and signed a Pledge of Confidentiality.• Ensure a process is in place to respond to requests for personal health information.• Review and respond to user audits.• Request additional user and/or patient audits as necessary.• Conduct investigations into any unusual user activity or suspected privacy breaches.• Ensure that administrative, physical, and technical safeguards are implemented to protect patient privacy.
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1.2 Activities

Training	<ul style="list-style-type: none">• Complete the mandatory eChart Manitoba Privacy Officer orientation session.• Ensure all site staff have received PHIA orientation and signed a Pledge of Confidentiality.
Requests for personal health information	<ul style="list-style-type: none">• Direct the requestor to the appropriate forms to make their request. https://echartmanitoba.ca/manitobans/forms/<ul style="list-style-type: none">○ Request Record of User Activity○ Request to Access Your Personal Health Information○ Add or Remove a Disclosure Directive• Ensure site release of information policy is followed to manage requests
Audits	<ul style="list-style-type: none">• Conduct a line-by-line analysis of routine compliance audits to confirm user activity and identify where access is suspicious or a privacy breach.• Submit routine compliance audit findings to Shared Health Privacy as part of audit process.• Request additional user or patient audits as required.
Investigations	<ul style="list-style-type: none">• Investigate privacy breaches in accordance with site privacy policies and procedures.• Notify Shared Health Privacy of any potential privacy breach discovered at the site involving eChart.• Request user/patient audits as required to support investigation.• Submit findings to Shared Health Privacy.

2 eChart Manitoba Access Role Matrix

The chart below shows the eChart Manitoba roles and the information viewable by each role.

	Level of Access						
	Demographic View	Laboratory and Reports View	Immunizations View	Medications View	Clinical View	Clinical View with Images	Clinical View with Images & Override
Demographic information	✓	✓	✓	✓	✓	✓	✓
Immunizations	✗	✗	✓	✗	✓	✓	✓
Medications	✗	✗	✗	✓	✓	✓	✓
Clinical documents	✗	✓	✗	✗	✓	✓	✓
Laboratory results	✗	✓	✗	✗	✓	✓	✓
Diagnostic image reports	✗	✓	✗	✗	✓	✓	✓
Launch image viewer	✗	✗	✗	✗	✗	✓	✓
Pathology	✗	✓	✗	✗	✓	✓	✓
Encounters	✗	✗	✗	✗	✓	✓	✓
Ability to override	✗	✗	✗	✗	✗	✗	✓

Information Available

Legend	
✓	Access
✗	No access

3 Requests for personal health information

Things to consider:

- 1) Is the information available in eChart?
- 2) Permitting the individual to view their information on screen may eliminate or lessen the request for printed copies.

4 Sources

To see the information displayed in eChart Manitoba refer <https://echartmanitoba.ca/hcp/sources/>

5 Instructions for interpreting an eChart Manitoba user audit report

The eChart Manitoba User Audit Report provides a history of the information viewed by an eChart user while in a patient's record. Depending on the date range selected for the audit, one or multiple patients' records may have been accessed, with different information viewed within each patient record.

5.1 Sample of user audit report

eChart Manitoba User Audit Report - Site Level

Start Date: 1-Oct-2022 **End Date:** 31-Oct-2022
User Audited: Tracey Montoia **User ID:** tmontoia4
Location(s): Clearwater Health Centre **User Role:** Licensed Practical Nurse

Date	Time	Patient Name	Patient Identifier	Patient Birth Date	Patient Gender	Information Viewed
2022-11-08	10:38:39					Patient was searched
2022-11-08	10:38:44	Conrad Valentine	939624175	01-Jun-2007	M	Entered patient file Patient Entry Type: Patient search
2022-11-08	10:38:53	Conrad Valentine	939624175	01-Jun-2007	M	Immunizations category was expanded Category: Immunizations Grouped: N/A
2022-11-08	10:38:55	Conrad Valentine	939624175	01-Jun-2007	M	Act was selected to display detailed view Category: Immunizations
2022-11-08	10:38:58	Conrad Valentine	939624175	01-Jun-2007	M	Act was selected to display detailed view Category: Immunizations
2022-11-08	10:38:59	Conrad Valentine	939624175	01-Jun-2007	M	Medications category was expanded Category: Medications Grouped: Yes
2022-11-08	10:39:08	Conrad Valentine	939624175	01-Jun-2007	M	Additional data requested for display/ Data within specific date range was selected Category: Medications
2022-11-08	10:39:30	Conrad Valentine	939624175	01-Jun-2007	M	Data was printed
2022-11-08	10:42:16	Amie Jardina	942777465	16-Jul-1991	F	Enter to Patient File
2022-11-08	10:42:19	Amie Jardina	942777465	16-Jul-1991	F	Browsing Demography Details Page.
2022-11-08	10:42:28	Amie Jardina	942777465	16-Jul-1991	F	Browsing Encounters Page.
2022-11-08	10:43:08	Amie Jardina	942777465	16-Jul-1991	F	Browsing Medications Page.
2022-11-08	10:43:37	Amie Jardina	942777465	16-Jul-1991	F	Browsing Laboratory Events Page.
2022-11-08	10:44:01	Amie Jardina	942777465	16-Jul-1991	F	Browsing Imaging Page.
2022-11-08	10:44:31	Amie Jardina	942777465	16-Jul-1991	F	Browsing Immunizations List Page.
2022-11-08	10:44:44	Amie Jardina	942777465	16-Jul-1991	F	Browsing Clinical Documents Page.
2022-11-08	10:44:55	Amie Jardina	942777465	16-Jul-1991	F	Browsed Enrolment Status Report

PRIVACY REMINDER

This report contains personal information and/or personal health information that is protected under *The Freedom of Information and Protection of Privacy Act* and *The Personal Health Information Act*. This report must be kept confidential and is only to be copied or shared in accordance with these Acts.

Report field	Description
User Name	User's first/last name associated with eChart Manitoba account
User ID	User's ID to access eChart Manitoba
User Role	User's access role in eChart Manitoba
Date	Date the user accessed the patient information
Time	Time the user accessed the patient information
Patient Name	Patient's first/last name
Patient Identifier	Patient's Manitoba Personal Health Information Number (PHIN). Occasionally a hospital medical record number (MRN) or out-of-province insurance number may appear to assist with confirming the patient's identity for the purpose of completing the audit
Patient Birth Date	Patient's date of birth; field might be blank if patient is from out of province.
Gender	Patient's gender
Information Viewed	eChart clinical view events

5.2 Source code identifiers

Source Code ID	Source
ABPHN	Alberta Health and Wellness
BR	Brandon Regional Health Authority and Assiniboine Regional Health Authority
BSP	Breast Screening Program
BHC	Breast Health Centre
BU	Burntwood Regional Health Authority
CF	Canadian Armed Forces
CCM	CancerCare Manitoba
CE	Central Regional Health Authority
CH	Churchill Regional Health Authority
COH	Concordia Hospital
DLC	Deer Lodge Hospital
NLMSN	Department of Health and Community Services - Newfoundland and Labrador
GRH	Grace Hospital
NTHCN	Health and Social Services - Northwest Territories
NUHCN	Health and Social Services - Nunavut
YTHCN	Health and Social Services - Yukon
HSC	Health Sciences Centre
IN	Interlake-Eastern Regional Health Authority
MBH	Manitoba Health
ONHCN	Ministry of Health and Long-Term Care - Ontario
BCPHN	Ministry of Health Services - British Columbia
MHC	Misericordia Health Centre
NO	NOR-MAN Regional Health Authority
NE	North Eastman Regional Health Authority
NSMSN	Nova Scotia Department of Health
PAC	Pan Am Clinic
PA	Parkland Regional Health Authority
QCHCN	Quebec HCN
RCMP	RCMP Regiment No
RHC	Riverview Health Centre
SKHSN	Saskatchewan Health
SOH	Seven Oaks General Hospital
SE	South Eastman Regional Health Authority/Sante Sud-Est Inc.
SBH	St. Boniface General Hospital
VGH	Victoria General Hospital
WCS	Winnipeg Region - Community Services
WI	Winnipeg Regional Health Authority
NBMN	New Brunswick Medicare No
ME-ADT-1	Manitoba eHealth ADT-EPR

Source Code ID	Source
PEHCN	Prince Edward Island Department of Health
ME-HCS-1	Procura (Manitoba Provincial Home Care)
FNAT	INAC - First Nations
VAC	Veterans Affairs Canada
CORR	Correctional Services Canada
CC-ADT	Citizen and Immigration Canada

5.2 Suggestions for reviewing eChart audit reports

The following are suggestions for reviewing an audit report received from Shared Health Privacy Analysts:

- Did the user view information about an individual who is not a patient at the site?
- Did the user view information about other employees?
- Did the user view their own personal health information?
- Did the user view information about a patient who has the same last name?
- Did the user view information about VIPS (e.g., celebrities, politicians or other high visibility community individuals)?
- Did the user access an individual's information an unusually high number of times?

Considering the user's role at the site, has any unusual searching or viewing activity occurred? Sites may choose to have the user's direct supervisor/manager review the report to determine if any of the above has occurred or have the user review the report of their own eChart use and acknowledge that their access was appropriate. The methodology used for reviewing the audit reports should be determined by the site. The Privacy Officer will complete the audit response form and return it to the Shared Health Privacy Analyst.

5.3 Audit and audit-related requests

To request a privacy audit, submit, your details to the Shared Health Service Desk.

Shared Health is committed to protecting the privacy and confidentiality of users and patients associated with the audit request. It is **important that the right kind of information is included** in the request. You will receive an incident number by email and be contacted by a Shared Health Privacy Analyst to obtain additional details.

INCLUDE

- ✓ the phrase "Privacy Audit" in the subject line
- ✓ your contact information and the system(s) that require auditing in the body of the email

DO NOT INCLUDE

- ✗ information that could identify the user or the patient
- ✗ sensitive circumstances associated with the audit request

6 Contact information

For technical problems with eChart Manitoba, contact the Shared Health Service Desk at 204-940-8500 or 866-999-9698 or send an email to servicedesk@sharedhealthmb.ca.