



Information and Privacy
Commissioner of Ontario
Commissaire à l'information
et à la protection de la vie privée de l'Ontario

October 31, 2014

VIA ELECTRONIC AND REGULAR MAIL

Robert MacIsaac, President and CEO
Hamilton Health Sciences
McMaster University Medical Centre
1200 Main St. West
Room 2E28
Hamilton, Ontario, Canada
L8N 3Z5

Dear Mr. MacIsaac:

RE: Review of the Report on the Practices and Procedures of Hamilton Health Sciences Corporation in respect of the Critical Care Information System

Pursuant to subsection 13(2) of Regulation 329/04 of the *Personal Health Information Protection Act, 2004* ("the *Act*"), the Office of the Information and Privacy Commissioner of Ontario (IPC) is responsible for reviewing the practices and procedures implemented by an organization that has been designated as a prescribed person for the purposes of subsection 39(1)(c) of the *Act*, to protect the privacy of individuals whose personal health information it receives, and to protect the confidentiality of that information.

The practices and procedures of the prescribed person, Hamilton Health Sciences Corporation, in respect of the Critical Care Information System (Criticall) were initially approved as of June 24, 2014. However, as you are aware, in order to synchronize the timing of the reviews of all of the prescribed persons under the *Act*, this approval only remained in effect until October 30, 2014. Hamilton Health Sciences Corporation was requested to submit a letter to the IPC prior to September 1, 2014, noting any changes to the practices and procedures that were outlined in the IPC Report dated June 24, 2014, so that the IPC could review and approve these practices and procedures effective October 31, 2014 for a further period of three years.

The IPC has now completed its review of your policies, procedures and most recent letter, dated August 11, 2014. Based on this review, I am satisfied Hamilton Health Sciences Corporation, in respect of Criticall, continues to have in place practices and procedures that sufficiently protect the privacy of individuals whose personal health information it receives, that sufficiently maintain the confidentiality of that information and that continue to meet the requirements of the *Act*.

Accordingly, effective October 31, 2014, I am pleased to advise that the practices and procedures of Hamilton Health Sciences Corporation in respect of Criticall continue to be approved for a further three-year period.

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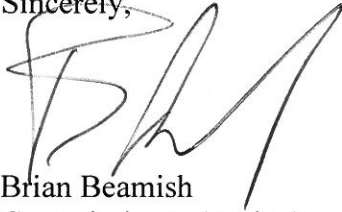
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I would like to extend my gratitude to you and your staff for your cooperation provided during the course of the review, including your diligence and timeliness in submitting the requested documentation, in responding to requests by my office for further information, and in making the amendments requested.

Sincerely,

A handwritten signature in black ink, appearing to read 'B Beamish', written over a light blue horizontal line.

Brian Beamish
Commissioner (Acting)

Attach.

cc:

Mary Bedek, Director of Privacy and Freedom of Information
Christine Moon, Senior Specialist Communications, Quality and Privacy Lead
Donna Thomson, Executive Director

General Note to All Prescribed Persons and Prescribed Entities

The IPC wishes to clarify its expectations regarding the process for the three-year review and approval of prescribed entities and prescribed persons. For future reviews, the IPC will require that you provide your reports for the period spanning from one year prior to the previous approval up to and including October 31st of the year prior to the next expected approval date. Therefore, for the next expected approval date (October 31, 2017), the IPC requires that your reports, especially with regard to your indicators, cover the period from November 1, 2013 up to and including October 31, 2016.

If, at the time of delivering your report, some of the indicators for more recent months are not yet compiled, you will be expected to provide amendments to include the missing data within a reasonable time period after the initial submission of your report. For those prescribed entities and prescribed persons which have provided indicators beyond October 31, 2013 for the current approval, the IPC requires you to simply resubmit, on October 31, 2016, those portions of your indicators which went beyond October 31, 2013 along with new, previously unreported data, as required.