



HIA Bulletin

Netcare Expedited PIA Process AUGUST 2014 UPDATE

The *Health Information Act* (HIA) requires custodians making changes to practices or information systems that could impact patient privacy to conduct a privacy impact assessment (PIA) and submit it to the Office of the Information and Privacy Commissioner (OIPC) for review and comment. Adoption of Alberta Netcare is such a change and requires every custodian wishing to use Netcare through the Netcare Portal to complete a PIA.

Since 2006, Alberta Health and the OIPC have agreed to follow an expedited process for custodians to submit PIAs for Alberta Netcare Portal. Under this expedited process, custodians attest they understand their duties and responsibilities in relation to Alberta Netcare, as described in the Alberta Netcare PIA written on their behalf by Alberta Health. Custodians also provide documentation describing their own management of privacy functions, including organizational structure and HIA policies (Part B of the [PIA Requirements](#) guide published by the OIPC). The OIPC has accepted two PIAs from Alberta Health for Alberta Netcare Portal:

- H1124, accepted September 1, 2006; and
- H3879, accepted March 18, 2013.

New Alberta Netcare Guide for Authorized Custodians

In January 2014, Alberta Health released a new [Alberta Netcare Guide for Authorized Custodians](#) ("the Guide"). The Guide describes custodians' responsibilities in relation to Alberta Netcare and sets out a new process where custodians accessing Netcare attest that they have reviewed the current Alberta Netcare PIA (H3879). Unfortunately, the OIPC continues to receive PIAs that refer to the earlier Netcare PIA (H1124), using the previous expedited PIA process.

[As of August 1, 2014, OIPC is no longer accepting PIA submissions that refer to the previous Alberta Netcare PIA H1124. PIA submissions that do not follow Alberta Health's current process, referring to Alberta Netcare PIA H3879, will be returned to the submitting custodian.](#)

If you have any questions about the Alberta Netcare Guide or need to obtain the required reading materials, please contact the eHealth Alberta Netcare Support Team at 1-855-643-8649 or by email at eHealthprivacy@cgi.com.



Office of the Information and
Privacy Commissioner of Alberta