PRIVACY IMPACT ASSESSMENT: EdEHR

Prepared by: Sybil Harrison
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Part 1 – General Information and Overview

1.1 Contact Information

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1.2 Description of the Initiative

The college is implementing edEHR, an open-source, cloud-hosted electronic health records tool, within the college learning management system (D2L) for use in the delivery of nursing and other health professional courses . Camosun is adopting this tool in collaboration with provincial partners Selkirk and BCIT on this initiative.

This initiative addresses the recommendation arising from the Canadian Association of Schools of Nursing (CASN) accreditation report. The college is committed to preparing students for workplaces where they are required to access healthcare informatics platforms in the routine care of their clients and patients for care documentation, interprofessional collaboration, laboratory and diagnostics reports, medication management and documentation, and client privacy and safety.

Implementation of edEHR is also driven by the University of Victoria curriculum partnership to better prepare student nurses for the informatics paradigm of their practice, an entry to practice competency.

edEHR is integrated within D2L based on the LTI integration standard. Access to the EdEHR tool is through D2L, no additional third-party software or plugins are required.

1.3 Scope of PIA

This Privacy Impact Assessment covers:
- Privacy and security of the edEHR service
- Data shared between Camosun's D2L instance and edEHR
- Disclosure, retention and disposition of personal information

This PIA covers the structure and function of EdEHR.org and the data collection and management from the LMS data link to EdEHR.org servers

1.4 Related Privacy Impact Assessments

There are no other privacy impact assessments related to this PIA. Selkirk College, another user of this product was consulted.

1.5 Elements of Personal Information or Data

The following information and data elements are collected in the use of edEHR

Personal information collected	Why it is collected
Student First and last name as provided by D2L	To identify individual's work on records
Student c# and user role	To support instructors in identifying student work
Instructor first and last name as provided by D2L	For instructors to identify their student's work in a shared environment

1.6 Storage or Access Outside Canada

edEHR is an open source collaborative. EdEHR is a Canadian initiative funded by BC Campus and partner institutions; all of its services are hosted on DigitialOcean servers based in Toronto.

No information is stored outside of Canada. EDEHR.org uses servers located in Toronto with DigitalOcean. Section 15(1)(l)
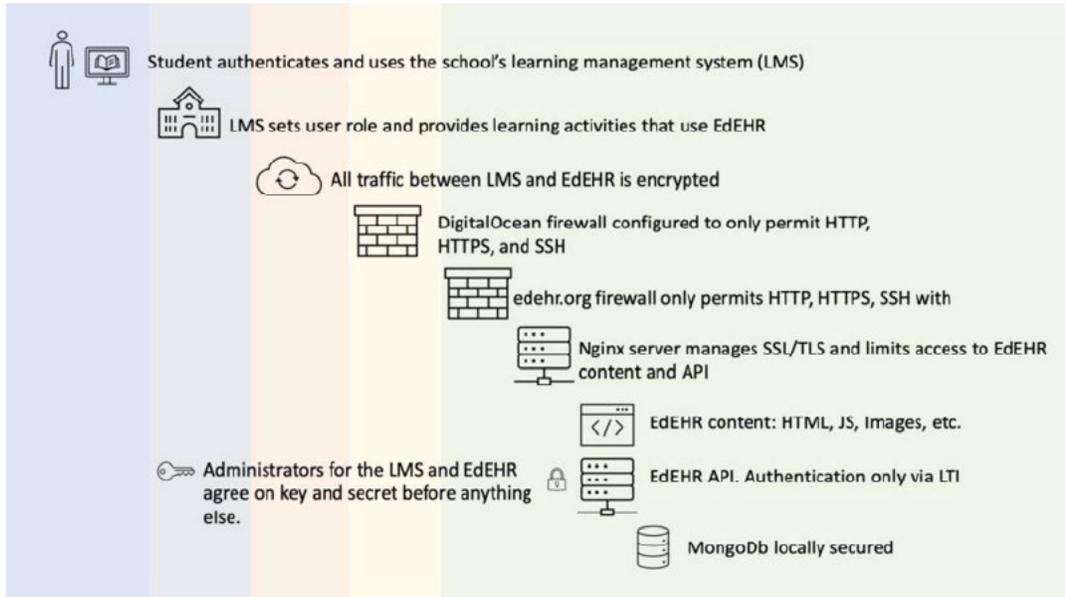
1.7 Data-linking Initiative

This initiative is not considered a data-linking initiative (FIPPA s.36.1)

1.8 Common or Integrated Program or Activity

This initiative is not considered a common or integrated program or activity as defined by Schedule 1 of FIPPA.

Part 2 – Protection of Personal Information

2.1 Personal Information Table

Personal Information Flow Table			
	Description/Purpose	**Type**	**FOIPPA Authority**
1.	Data link between institutional LMS and EdEHR.org. EdEHR relies on the institutional LMS to verify identifying information according the IMS Global Learning Consortium recommended Learning Tools Interoperability Core Specification IMS Final Release Version 1.3	Collection	26(c),
2.	Student complete assignment creating digital artifact that is stored at EdEHR.org for up to 1 year.	Collection	26 (c)
3.	Instructor with specific workload to course reviews student work and provides written assessment/feedback	Use	26(c), 33.2(a)
4.	Instructor or group of instructors develop and input case-based content and assignments. No access to student information at this time. Instructor personal information as above.	Use	32 (a)
5.	Student logs into D2L and identity verification is completed	collection	26(c)

2.2 Risk Mitigation Table

Risk	Mitigation Strategy	Likelihood	Impact
Personal information stored or accessed outside Canada	Services and recordings housed on AWS servers located in Canada.	Low	High
Unauthorized sharing, disclosure or access to the personal information	Camosun has established privacy policies and directives in place. HHS will provide students and instructors information on use and expectations. Only a single edEHR employee/contractor can access data	Low	High
User's personal information with edEHR is compromised	Privacy and security policies are in place, contractual obligations, data encryption, breach policies.	Low	High
Unauthorized retention of personal information	edEHR purges student ID and other personal information after one year	Low	Low
Unauthorized collection of personal information	Personal information shared to edEHR is controlled by the integration with D2L and is limited what is required to identify the student and their work	Low	High
Student personal information compromised	Minimal information collected Information collected has limited context to actual student outside of LMS	Low	Low
Student's personal information is compromised when transferred to the service provider	Section 15(1)(I)	Low	Low
EdEHR.org server compromised	Section 15(1)(I)	Low	Low

	Section 15(1)(I)		
EdEHR.org admin access compromised	Minimal student information collected Section 15(1)(I) Individual adherence to FOIPPA	Low	Medium

2.3 Collection Notice

Instructors will post a notice to students within the D2L course site informing them that edEHR is being used, and activity will be assessed.

This notice will include information regarding the location of the servers, explain personal information is only accessible by the instructor, etc. The email of the college's Privacy Officer will be provided in the case of additional questions, with a reference to the college's Protection of Privacy policy

Suggested text for this notice:

As part of your learning experience at Camosun College, you will be using a third-party resource called EdEHR.org, located outside of D2L and the college's network.

The purpose of integrating this tool into your learning experience is to facilitate and improve your knowledge of electronic health records in clinical practice. The personal information collected by edEHR when you use this tool include ID number (C#), first and last name and assignment submitted. The purposes for which that information is used by the third party are to allow instructors to create simulated interactions with an electronic health record.

Use of this cloud-based tool is in compliance with college policy and BC Privacy Legislation.

This cloud-based learning tool is provided through a third party and is therefore not managed by or stored on institutional computer servers. Information that you provide when using this tool and applications will be stored on computer servers located inside Canada. In particular, your information will be stored on servers in Toronto. For more information about EdEHR.org personal information privacy practices, please review their privacy policy and terms of use at https://edehr.org/privacy.

If you have any questions about personal information or privacy issues with the use of EdEHR.org you should contact your instructor or the college's privacy office (Privacy@camosun.bc.ca)

2.4 Consent for Storage/Access Outside of Canada and Opt-Out Procedure

Consent for storage and access outside of Canada is not required. edEHR is a Canadian organization and all data is stored on Canadian based servers.

2.5 Consent Withheld Procedure

A consent withheld procedure for disclosure of personal information outside of Canada is not applicable.

Part 3 – Security of Personal Information

3.1 Physical Security Measures

Section 15(1)(I)

3.2 Technical Security Measures

Section 15(1)(I)

3.3 Security Policies, Procedures and Standards

In addition, the following policies and directives are in place and compliance is expected from all students and instructors:

Access to the Learning Management System Policy Informed Directive
Academic Integrity Policy
Acceptable Use of Technology
Protection of Privacy Policy

Section 15(1)(l)

3.4 Tracking Access /Access Controls

Part 4 – Accuracy/Correction/Retention of Personal Information

4.1 Updating and Correcting Personal Information

Students are responsible for ensuring the accuracy of their personal information and can update it through myCamosun, the student portal to the college's Colleague student records system.

4.3 Records Retention and Disposal

FIPPA section 31 states that personal information must be for at least one year so that the affected individual has the opportunity to obtain access to that personal information.

CETL maintains a retention schedule for all information D2L collects and stores. In most circumstances course information, including exams, is retained for 3 years.

Personal data is retained for one year on edEHR servers.

Part 5 – Further Information

5.1 Systematic Disclosures of Personal Information

This initiative does not involve systematic disclosures of personal information.

5.2 Access for Research or Statistical Purposes

This initiative does not involve systematic disclosures of personal information for research or statistical purposes.

5.3 Other Applicable Legislation and Regulations

There are no other applicable legislation or regulations for this review or for this initiative.

5.4 Implementation

The use of edEHR is limited to courses taught within the School of Health and Human Services.

 Instructors using the system will receive training. Training will include a discussion about privacy.

Students will be advised that if they have privacy concerns to email the College's Privacy Officer (privacy@camosun.bc.ca)

The Director of Learning Services is responsible for ensuring all Camosun measures in regards to privacy for students using edEHR are in place.
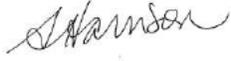
Sybil Harrison   April 4, 2022

Sybil Harrison
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Cynthia Smith   May 2, 2022

Cynthia Smith
Dean, School of Health & Human Services

PIA reviewed by:

Ann Behennah   Digitally signed by Ann Behennah
Date: 2024.06.05 13:36:50 -07'00'   June 6, 2024

Ann Behennah   Date
Privacy Officer

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