

PIA # and Name- 2321 One45

1 General Information

1. Name of Department, Branch and Program Area

UNBC School of Nursing, Family Nurse Practitioner Program

2. Name of Program or Service Representative

Kristine Rowswell - UNBC School of Nursing, FNP Program
Megan Caldwell - Administrative Manager, FHHS

3. When will the initiative take place? 5/31/23

4. Is this a one-time event?

Yes

No

5. Do you have an end date planned?

Yes

No

6. Describe the New Program or Service or the Change.

One45 is a program management solution provided by Acuity Insights that enables integrated scheduling, evaluation, curriculum mapping, and quality improvement workflow for clinical professional programs. It will replace Typhon, the current evaluation tool. Acuity better meets the needs of the Family Nurse Practitioner (FNP) program and, unlike Typhon, is compliant with Canadian privacy legislation. At the current time, only the FNP program within the broader School of Nursing will be adapting Acuity. The transition will occur through 2023 and is supported by key FNP faculty members. Support will be provided by School of Nursing staff including administrative members, instructional design, and academic advisors.

7. Describe the Purposes, Goals and Objectives.

The purpose of the transition from Typhon to Acuity Insights is two-fold.

First, Acuity is Canadian-based and compliant with current Canadian privacy legislation. The platform stores data within Canada, so students, clinical faculty and preceptors will no longer need to consent to have data stored outside of Canada.

Second, Acuity is better suited to meeting the needs of the FNP Program with respect to placement scheduling, curriculum development, evaluation, and reporting requirements. With an anticipated increase in program size over the next few years, there is a need to improve efficiencies in our clinical rotation scheduling, evaluation processes, and curriculum development. Acuity provides solutions to these issues in an integrated workflow on a single platform.

8. Describe the Governance Model – who is ultimately accountable for the program or system.

UNBC School of Nursing Chair

9. List any Relevant PIAs

NA

10. List of All Stakeholders Impacted / Involved (i.e. who are you collecting information from, UNBC roles using PI, 3rd parties with whom you will share information)

Stakeholder	Role in the initiative
UNBC School of Nursing	Deliver the FNP program; set up assessment tool for student, clinical faculty and preceptor use.
UNBC School of Nursing - FNP Clinical Faculty	Will use the assessment tool to interact with students and Preceptors, and assess student achievements
Preceptors	Will use the assessment tool to interact with clinical faculty and students, and assess student achievements
Students	Will use the assessment tool to interact with clinical faculty and preceptors and input clinical hours

11. List any relevant contracts or software purchases. Be sure to follow UNBC guidelines regarding purchasing policies.

Contract with Acuity Insights (will be finalized subsequent to this PIA)

2 Collection and Use of Personal Information

12. What are the data or information elements involved in your initiative?

Data Element name, email, id#, grade	Rationale for collection, use or disclosure	Method of Collection or Disclosure	FIPPA Section (completed by Privacy)
Student Name, Email, Evaluations	To connect students to their evaluation and assessment data and to contact them directly once assessments are made available or completed.	Direct Indirect	26(c)
Student Photo and brief bio	For faculty and preceptors to place/recall students when completing evaluations. To introduce students to preceptors at the beginning of their placements.	Direct Indirect	26(c)
Preceptor name, email, and site address	Placement information and to contact preceptors for evaluations	Direct Indirect	26(c)
Preceptor Evaluations	Obtain feedback from students about experiences with clinical site preceptors for ongoing quality assurance and preceptor development	Direct Indirect	26(c)
Clinical Faculty Evaluations	Obtain feedback from students about experiences with clinical faculty for ongoing quality assurance and preceptor development	Direct Indirect	26(c)
First and last name of faculty completing evaluations	Confirmation of which clinical faculty requires access	Direct Indirect	26(c)
Anonymized clinical examples	Students use this platform to share anonymized examples of clinical cases from their practicum experiences. No identifying information is included.	Direct Indirect	26(c)

13. Describe how personal information is to be collected

Student names and email addresses will be provided to the School at the time of registration. Where available, names and contact information will be collected from previously documented lists in the School. Student biographies and photos will be submitted to an administrative assistant at UNBC, and that staff member will input into One45.

Preceptor names and contact information and site names and addresses are collected from a centralized provincial placement database called HSP. Prospective preceptors agree to take a student after conversation with a UNBC Placement Coordinator. Their name and email goes into HSPNet and is then retrieved from HSPNet and inputted to One45 by a UNBC administrative assistant.

Clinical faculty names and contact information is inputted into One45 by a UNBC administrative assistant. The information is taken directly from pre-existing UNBC lists as all Clinical Faculty are either sessional contractors or employees of UNBC. Evaluations are completed via online forms, built directly into One45. The evaluator will log into the program and will only be able to complete evaluations for individuals they are associated with in the program. For example, clinical faculty are assigned to a set number of students at the beginning of the year and they are only able to complete evaluations for those students.

14. If you already have a collection notice, attach it as an appendix.

15. Please list all users of PI and Describe how personal information is to be used.

User (UNBC Roles e.g Governance officer)	How the info is used
FNP Clinical Placement Coordinator	- will use student and preceptor names and email addresses to communicate with each party, will use site addresses to coordinate placements and email students where they are going and when for clinical rotations
FNP Program Advisor	will use names and email addresses of students for communication purposes via One45
FNP Coordinator	will see names and contact information of students, faculty, and preceptors for general program oversight. Will only see evaluation data if they are assigned to a student who they are evaluating. Will use aggregate and de-identified information to determine program trends (types of patients being seen, numbers of patient case logs over time, etc). Will use preceptor names and site information to oversee clinical rotations for QA purposes.
FNP Clinical Lead	student, preceptor, and faculty names and contact information will be used to oversee all clinical rotations and to communicate. Will only see student evaluation data if assigned to a particular student.
FNP Clinical Faculty	will see names and contact information of preceptors and students to which they are assigned, for communication purposes. Will see preceptor evaluations of students and student self-evaluations, which are used to provide feedback, determine clinical proficiency and learning requirements.
FNP Program Students	will see the names and emails of preceptors and faculty to whom they are assigned, for communication purposes. Will input anonymized clinical case logs and time logs, for evaluation purposes.
Preceptors	- will see names and contact information of their students, for communication. Will be able to access evaluation forms for the students they are assigned only. Will be able to see evaluations completed about them by students (in aggregate form only).
FNP Administrative Assistant	will input names, contact information (email), student photos, and student bios into One45

16. Do you use personal information in your initiative to make a decision about an individual?

Yes

No

17. If yes, do you have a retention schedule in place related to personal information used to make decisions?

Yes

No

18. If yes, please your approved information schedule as an appendix.

19. If you answered no, describe how you will ensure the information will be kept for a minimum of one year after it's used to make a decision that directly affects an individual.

Student case logs and evaluations will be stored on Acuity for 1 year after program completion, after which they are deleted. Personal information used to make decisions would involve looking at evaluation data that is paired to a student name and deciding whether to pass, fail, or place a student on a learning plan.

3 Storage of Personal Information

20. Is any personal information stored outside of Canada?

Yes

No

21. Describe how PI information will be stored

For example, are you using a cloud storage (OneDrive), or Software as a Service (SaaS).

Acuity Insights is a SaaS company that uses Amazon Web Services (AWS) to provide cloud hosting. Acuity Insights is responsible for all server configuration and support on top of the AWS infrastructure.

[REDACTED]

22. Does your initiative involve digital tools, databases information systems?

Yes

No

If yes, please discuss with UNBC Information Security whether you also require a security and threat risk assessment

4 Research / Health System Use

23. Do you anticipate that data collected by this program / system will be used for research or health system use?

Yes No

If "Yes" answer the following questions, if "No" please proceed to the next section.

24. Please explain and provide details of data state (aggregate, de-identified, anonymized etc.)

Information contained in One45 may be used for future research, although that is not the primary reason for adapting the program. Future research projects may, however, utilize de-identified and aggregate data from patient case logs to determine trends in types of patients seen by students over time (e.g. conditions, age brackets, complexity), to determine volume of patients seen through clinical rotations, or for research related to program curricular development. Any data with a cell size of 5 or less would be omitted.

25. Will it be disclosed as part of Health System Use?

Provide details on the disclosure, including where and how personal information will be stored.

No

26. Will it be disclosed as part of Research / Open Data?

Provide details on the disclosure, including where and how personal information will be stored.

No

5 Disclosure

27. Will you be disclosing information to 3rd parties (i.e. non-unbc employees)?

Yes

No

If "Yes" answer the following questions, if "No" please proceed to the next section.

28. To whom will you be disclosing personal information? Provide details on the disclosure, including where and how personal information will be stored.

Student names and email addresses are disclosed to their assigned preceptors and clinical faculty at the beginning of each semester. The program coordinator will email this information to the students, preceptors, and clinical faculty via an attached PDF letter using a UNBC email only. This email would also include site information including site/clinic name and address.

29. If personal information will be disclosed to anyone outside of Canada, provide details on the disclosure, including where and how personal information will be stored.

NA

6 Accuracy and Correction

30. How will you make sure that the personal information collected is accurate and complete?

Individuals will be providing their own names and contact information, or that will be collected from previously documented lists from the School. All users will have access to their profiles and will be asked to notify administrative staff to update their information if inaccuracies are detected.

31. Do you have a process in place to correct personal information?

Yes

No

32. If yes, please describe your process below?

Administrative staff with administrative access would be notified of required corrections by the user who notices the error, and will update that information accordingly.
If an error is made on an evaluation tool after it has been submitted, then a user with administrative access would be notified by the person who made the error. The evaluation tool would be re-opened by the administrator, and the evaluator would correct the error. The evaluation would then be closed again by the evaluator.

33. Describe the process of how you will make a note on the record, if you're not able to correct the record itself.

NA

34. If you receive a request for correction from an individual and you know you disclosed their personal information in the last year, FOIPPA requires you to notify the other public body or third-party recipient of the request for correction. How will you ensure that you conduct these notifications when necessary?

Administrative staff would contact the third party promptly after being made aware of the request for correction to update that information. This would only involve names and contact information, as evaluations would not be disclosed to a third party.
Re-open assessor form (admin does) - the person can then go back in and re-submit.
Time stamps - by someone else

7 Personal Information Banks

A personal information bank is a collection of personal information that is organized or searchable by the name of the individual or an identifying number, symbol, or other identifier. A personal information bank can be a simple list of personal information.

Personal information banks contain personal information that is:

- linked to an identifiable individual
- organized and capable of being retrieved by a personal identifier
- normally compiled for a single purpose

35. Will your initiative result in a personal information bank?

Yes

No

If "Yes", answer the following questions, if "No" please proceed to the next section.

36. Describe the business purpose for the information bank (i.e., account management of clients, student record management)

Students who are in clinical rotations will create daily case logs to document their clinical experiences. They are asked to document time spent doing clinical tasks (seeing patients, consulting, writing chart notes, etc) and patient case logs. They will input information about each patient that is anonymized and would include age bracket, gender, and generic reason for visit based on a standardized list of medical diagnoses (ICD-10 and NP Encounter Codes).

37. If aggregate reports are generated, explain how Personal Information will be de identified or anonymized and by whom?

FNP Coordinator will use aggregate and de-identified information to determine program trends (types of patients being seen, numbers of patient case logs over time, etc). De-identified and aggregate data from patient case logs may be used to determine trends in types of patients seen by students over time (e.g. conditions, age brackets, complexity), to determine volume of patients seen through clinical rotations, or for research related to program curricular development. Any data with a cell size of 5 or less would be omitted.

38. Describe the category of users and the information to which they will have access

Category of Users	Information accessed (i.e. contact info, grades, fee etc.)
Students	will see the names and emails of preceptors and faculty to whom they are assigned. Will input anonymized clinical case logs and time logs, for evaluation purposes.
Preceptors	- will see names and contact information of their students, for communication. Will be able to access evaluation forms for the students they are assigned only.
Clinical Faculty	will see names and contact information of preceptors and students to which they are assigned, for communication purposes. Will see preceptor evaluations of students and student self-evaluations.
Clinical Lead	student, preceptor, and faculty names and contact information will be used to oversee all clinical rotations and to communicate. Will only see student evaluation data if assigned to a particular student.
Coordinator	will see names and contact information of students, faculty, and preceptors for general program oversight. Will only see evaluation data if they are assigned to a student who they are evaluating.
Administrative Assistant	will see names and contact information and bio of all students
super-administrator	oversee user access, create accounts, and audit users

39. Who is responsible for oversight of user access?

The system super-administrator will oversee user access (Kristine Rowswell). This person overalls general implementation of the program, compiles information from key stakeholders at the University to Acuity, is fully trained on the system, troubleshoots the program, trains peers, and defines standards of use for the institution.

40. Who reads the audit logs, and how long are they kept?

[Redacted]

41. What does the audit log track? How detailed is the data (e.g., date stamps, time stamps, access control number, IP address, etc.)? Does the audit log include the purpose of an access?

[Redacted]

42. Are the audit logs immutable?

Yes No

43. Is there a separation of responsibility between those who supervise administration of the system, or security of the system, and those who verify the audit logs (e.g., does the auditor in the organization have a role, or is it the security department?)

Yes No

44. Is the system responsive or passive? For instance, is it possible to put a monitor on particular individuals (e.g., in a hospital setting, if a celebrity is admitted as a patient, etc.)? Will access produce an immediate response and not just a log entry for review months later?

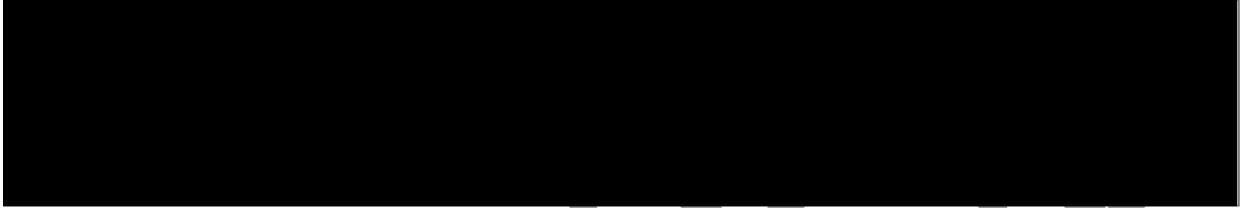


45. How will those found to abuse access privileges be sanctioned ?

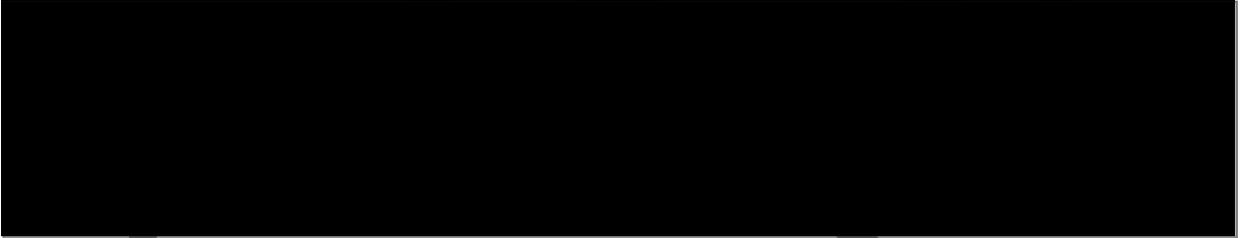
If this occurs, a user will be asked to meet with the program Chair, with access privileges sanctioned to a degree in accordance with the severity of the infraction.

8 Privacy and Security Safeguards

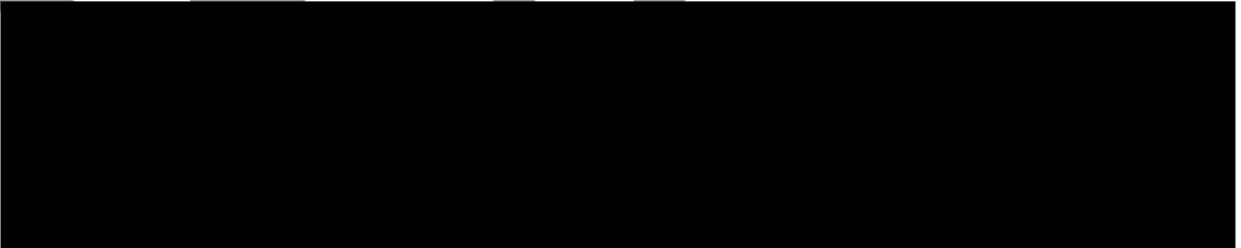
46. Describe administrative safeguards (i.e. policy documents, procedures, or training).

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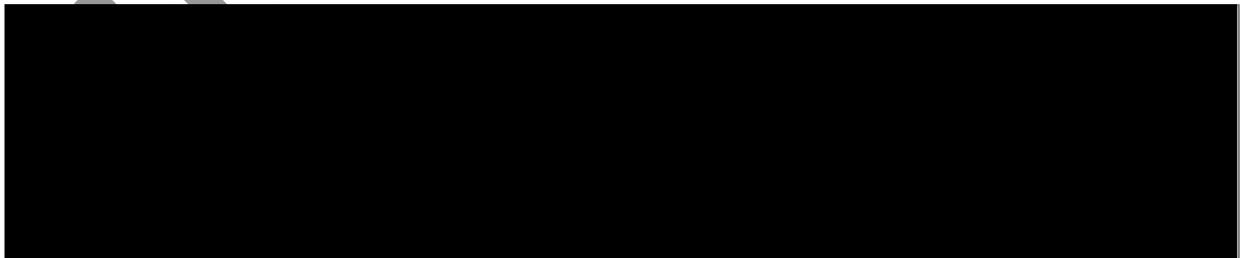
47. Describe physical safeguards (i.e. locked, filing cabinets, locked doors, or restricted areas).

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48. Describe the controls in place to prevent unauthorized access to personal information (i.e. role-based access to software, access logs).

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49. Describe technical safeguards (i.e. firewalls, encryption, or intrusion prevention systems).

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9 Privacy Risk Identification and Mitigation

50. Identify any privacy risks, even very unlikely ones, associated with the initiative and the mitigation strategies that will be implemented (see risk classification table).

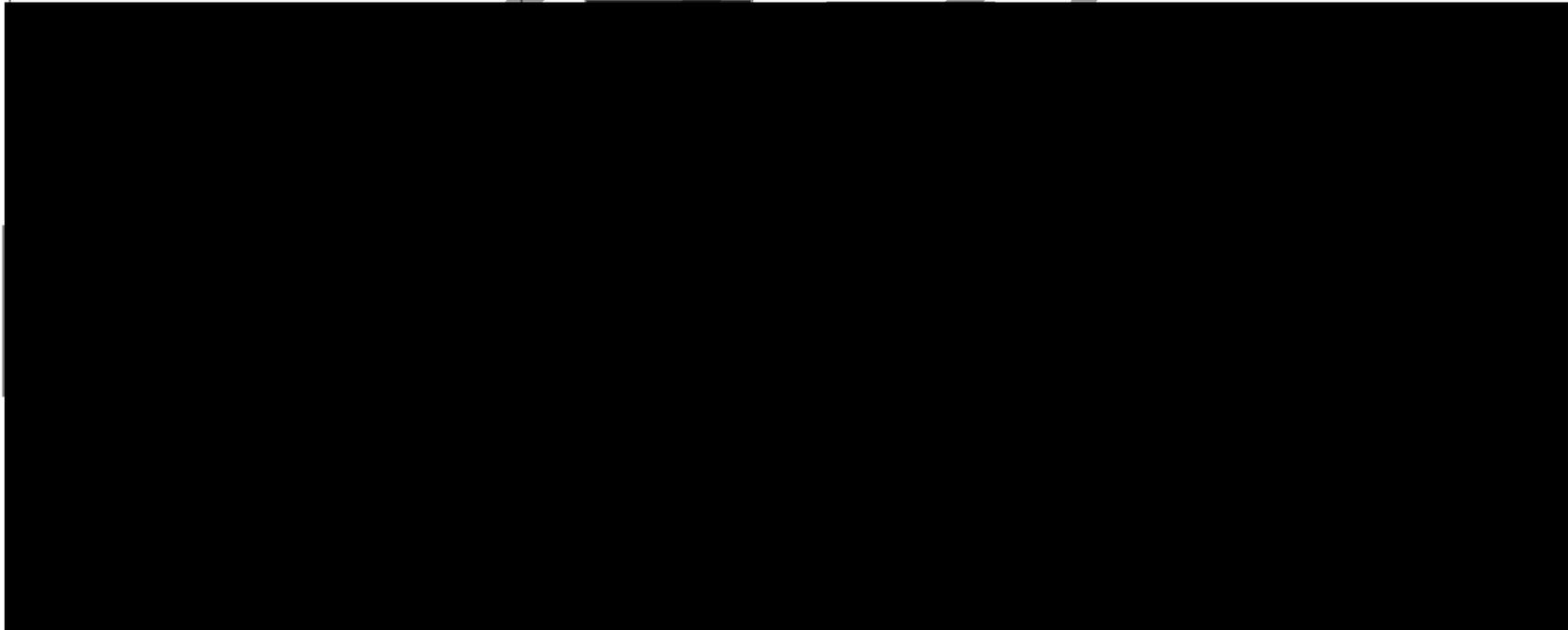
Try to include at least one risk related to each step in the information cycle (collection, storage, access, disclosure, and destruction). **If you are disclosing or storing data outside of Canada you will need to identify additional risks related to storage/disclosure outside of Canada**

RISK

LIKELIHOOD

IMPACT

MITIGATION STRATEGY



RISK

LIKELIHOOD

IMPACT

MITIGATION STRATEGY



[Redacted]

Low
Moderate
High

Low
Moderate
High

[Redacted]

[Redacted]

Low
Moderate
High

Low
Moderate
High

[Redacted]

[Redacted]

Low
Moderate
High

Low
Moderate
High

[Redacted]

COPY OF RECORD RELEASED JULY 31, 2024 IN RESPONSE TO FOI 24-18

10 Data Linking

In FOIPPA, “common or integrated program or activity” is strictly defined. Answer the following questions to determine whether your initiative qualifies as “a common or integrated program or activity” under the Act. If you answer “yes” to all 3 of these questions, you must comply with requirements under the Act for common or integrated programs and activities.

51. Does this initiative involve a program or activity that provides a service(s) through a public body and at least one other public body or agency working collaboratively to provide that service?

Yes

No

52. Does this initiative involve a program or activity that provides a service(s) through a public body that is working on behalf of one or more other public bodies or agencies?

Yes

No

53. The common or integrated program/activity is confirmed by written documentation that meets the requirements set out in the Regulations? (Privacy Officer will answer).

Yes

No

If this PIA addresses a common or integrated program, UNBC must submit this PIA to the Office of the Information and Privacy Commissioner and be subject to their examination, advice, and timelines.

11 Conclusions and Approvals

Individual leading the Program/Project: Kristine Rowswell

Position: Lecturer, Family Nurse Practitioner Program, School of Nursing

I confirm the information management practices in this initiative have been documented as accurately as I am aware. I commit to communicating appropriate information management practices to all individuals participating in this initiative. I commit to following the documented practices on this PIA, or arranging a PIA amendment if I am aware information management practices in this initiative change.

Signature: _____ Date: _____

Director/Dean Overseeing the Program/Project:

I am accountable for overseeing my staff involved in this initiative to ensure they adhere to information management practices presented in this PIA. I will arrange for the project lead named above to contact the Privacy Officer to arrange a PIA amendment if required.

Signature: _____ Date: *June 14, 2023*

Name of Vice-President

I confirm that this initiative to the best of my knowledge as written in the above sections, has information management practices that complies with policies and procedures of the University of Northern British Columbia.

Signature: _____ Date: _____

Name of Privacy Officer:

I confirm that this initiative to the best of my knowledge as written in the above sections, has information management practices that comply with British Columbia's Freedom of Information and Protection of Privacy Act.

Signature: _____ Date: _____

12 Privacy Notice

All collection notices must include:

As part of NURS 720 730 740 you will be provided access to One45. One45 is a cloud-based program used for FNP clinical rotation scheduling and evaluations. If you have any questions about how your personal information will be used, please contact: schoolofnursing@unbc.ca This information is being collected by UNBC under FOIPPA 26(c).

13 Key Terms

“**personal information**” means recorded information about an identifiable individual, including,

- (a) information relating to the race, national or ethnic origin, colour, religion, age, sex, sexual orientation or marital or family status of the individual,
- (b) information relating to the education or the medical, psychiatric, psychological, criminal or employment history of the individual or information relating to financial transactions in which the individual has been involved,
- (c) any identifying number, symbol or other particular assigned to the individual,
- (d) the address, telephone number, fingerprints or blood type of the individual,
- (e) the personal opinions or views of the individual except where they relate to another individual,
- (f) correspondence sent to an institution by the individual that is implicitly or explicitly of a private or confidential nature, and replies to that correspondence that would reveal the contents of the original correspondence,
- (h) the individual’s name where it appears with other personal information relating to the individual or where the disclosure of the name would reveal other personal information about the individual.

Risk Classification Table

***Risk Levels**

Likelihood

Harm

Low

Little possibility that the risk will occur due to mitigating factors

Compromise would likely not result in any significant harm to the privacy, safety, or economic standing of individuals or the corporation.

Moderate

A possibility that the risk will occur if no additional measures are taken.

Compromise would likely cause some harm to the privacy, safety, or economic standing of individuals or the corporation.

High

Near certainty that the risk will occur in the future if no corrective measures are taken.

Compromise would likely cause significant and immediate harm to the privacy, safety, or economic standing of individuals or the corporation.