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PART 1: GENERAL INFORMATION

Initiative title:	MYLE Electronic Medical Records (EMR) System
Organization:	Langara College
Branch or unit:	Langara Student Health Services
Initiative Co-Lead contact information:	Dr. Christine Singh, Medical Director, Langara Student Health Services csingh@langara.ca 604-323-5256
Privacy Officer:	Joanne Rajotte, Manager, Records Management and Privacy
Privacy Officer phone:	604-323-5660
Privacy Officer email:	jrajotte@langara.ca

Is this initiative a data-linking program under FOIPPA? If this PIA addresses a data-linking program, you must submit this PIA to the Office of the Information and Privacy Commissioner.

No.

Is this initiative a common or integrated program or activity? Under section FOIPPA 69 (5.4), you must submit this PIA to the Office of the Information and Privacy Commissioner.

No.

Related PIAs, if any:

Not applicable.

1. What is the initiative?

In 2021, Langara Student Health Services initiated the replacement of its current electronic medical records system (Wolf Medical System) with a cloud-based Software as a Service (SaaS) solution to improve services to clients, enhance security, and support Langara's shift to cloud-based platforms. After an extensive negotiated Request for Proposal process, Student Health Services identified a preferred vendor, Medfar Clinical Solutions (Medfar), a Canadian software company headquartered in Montreal, Quebec. Langara College will license Medfar's MYLE Electronic Medical Records (EMR) system to provide medical services to Langara College students and employees by:

- Maintaining medical and health-related histories
- Maintaining client biographical and contact information
- Managing client appointments
- Issuing prescriptions
- Managing referrals to other health professionals/specialists.

Medfar uses Microsoft Azure data centres located in the Canadian Geographic Region to host the MYLE EMR system, and will store Langara's data and information in Azure.

2. What is the scope of the PIA?

This PIA covers the collection, use, and disclosure of the personal and health-related records and information of clients (students and employees) of Langara Student Health Services that will be stored in the MYLE Electronic Medical Record system.

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

Department	Purpose	Data or Information Elements
Langara Student Health Services	**Client Care:** Collect, use, and disclose records and information to assess, diagnose, and treat clients (Langara students and employees).	Identification and Contact information, including: • name • date of birth • email address • phone number • physical address • emergency contact information • record of client appointment times Billing information, including: • Provincial health insurance plan (health card) number • private medical insurance details Health information, including: • medical history • presenting symptoms • physical examination findings • relevant medical history of family members • test requisitions and results (laboratory tests and x-rays) • reports from specialists or other health providers • diagnosis and treatment notes (including prescriptions) • allergies • information to be provided to third parties at the client's request (e.g., WorkSafeBC, reports for legal proceedings, insurance claims, or government claims)

3.1 Did you list personal information in question 3?

Yes.

PART 2: COLLECTION, USE AND DISCLOSURE

4. Collection, use and disclosure

Personal Information Flow Table			
	Description/Purpose	**Type**	**FOIPPA Authority**
1.	Client completes an online new client information form immediately prior to their first appointment.	Collection	26(c)
2.	Client consents to transfer of medical chart or information from previous care provider.	Collection	27(1)(a)(i)
3.	SHS staff scan/import records into the MYLE EMR system.	Collection	26(c)
4.	SHS staff use records to provide client care and administrative support.	Use	32(a)
5.	Student client submits Request for Medical Withdrawal or Request for Aegrotat Standing for SHS to complete. Staff return the scanned form to the client to submit to Registrar and Enrolment Services. SHS does not add these forms to the MYLE EMR system.	Use	32(a)
6.	Client requests and consents to SHS transferring their medical records to another medical office.	Disclosure	33.2(d)
7.	SHS medical practitioners refer clients to specialists or requisition laboratory tests for clients.	Disclosure	33.3(d)
8.	SHS staff fulfill requests from lawyers, insurance companies, or other external organizations for client charts with the consent of the individual.	Disclosure	22(4)(a)

Risk Mitigation Table				
	Risk	**Mitigation Strategy**	**Likelihood**	**Impact**
1.	Employees could access personal information and use or disclose it for a purpose other than the reason it was collected.	Medical practitioners have professional regulatory body requirements to protect client confidentiality. Support staff access information on a need to know basis. A Privacy Policy and Procedures specific to Student Health Services are in place and all practitioners and staff are required to read them.	Low	High

		In addition, employees are expected to abide by College policies related to ethical conduct, computer and computing use, access to student computer records, and access to information and privacy.		
2.	The service provider's (Medfar Clinical Solutions) employees could access personal information and use or disclose it for purposes other than the reason it was collected or disclosed.	As stated in the service provider's NRFP response, Medfar: • s.15(1)(l); s.21(1) • • • • • Privacy clauses in agreement with service provider, which includes the Privacy Protection Schedule for Cloud Services, restrict their access to personal information.	Low	High
3.	Personal information could be compromised during transmission from Langara College to the Microsoft Azure data centre.	According to Medfar's nRFP response, s.15(1)(l); s.21(1)	Low	High
4.	Personal information stored in the Microsoft Azure data centre used	According to Medfar's nRFP response,	Low	High

	by the service provider could be compromised.	s.15(1)(l); s.21(1)		
5.	Inherent risks in transmitting personal information to clients or third parties.	s.15(1)(l)	Medium	Medium

5. Collection Notice

Langara Student Health Services collects personal information under the statutory authority of the *College and Institute Act*, (s. 41.1). This information is collected and will be used for the purpose of providing medical services to clients in compliance with the *Freedom of Information and Protection of Privacy Act*, (ss. 26(c) and 32(a)). Personal information is stored in an online electronic medical records system located in Canada. For questions about the collection, use, and disclosure of your personal information, contact Langara Student Health Services at 604.323.5256.

[1] 20180327 Azure PIA – final.pdf

PART 3: STORING PERSONAL INFORMATION

6. Is any personal information stored outside of Canada?

No. Personal information in the MedFar MYLE Electronic Medical Records system will only be stored and accessed in Canada in one of Microsoft Corporation's Canadian Geographic Region data centres located[2] s.15(1)(l); s.21(1) The service provider may access and use the personal information only for the purposes specified in the agreement and the Privacy Protection Schedule for Cloud Services appended to the agreement.

s.15(1)(l); s.21(1)

7. Does your initiative involve sensitive personal information?

Yes. The following categories of sensitive personal information may be involved:

- Medical and health-related information
- Social Insurance Number
- Gender orientation or expression
- Race or ancestry

8. Is the sensitive personal information being disclosed outside of Canada under FOIPPA section 33(2)(f)?

No.

9. Where are you storing the [sensitive] personal information involved in your initiative?

Information will be stored in Canada (see #6 for details).

[2] s.15(1)(l)

PART 4: ASSESSMENT FOR DISCLOSURES OF SENSITIVE PERSONAL INFORMATION OUTSIDE OF CANADA

10. Is the sensitive personal information stored by a service provider?

Not applicable.

11. Provide details on the disclosure, including to whom it is disclosed and where the sensitive personal information is stored.

Not applicable

12. Does the contract you rely on include privacy-related terms?

Not applicable.

13. What controls are in place to prevent unauthorized access to sensitive personal information?

Not applicable.

14. Provide details about how you will track access to sensitive personal information.

Not applicable.

15. Describe the privacy risks for disclosure outside of Canada.

Not applicable.

PART 5: SECURITY OF PERSONAL INFORMATION

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

Yes, MYLE is a cloud-based electronic medical records system.

16.1 Do you or will you have a security assessment to help you ensure the initiative meets the security requirements of FOIPPA section 30?

Yes, Information Technology conducted a security assessment on the MYLE EMR during the evaluation of Medfar's nRFP response.

16.2 Security and Privacy Certifications

According to Medfar Clinical Solutions, it is ISO 13485 certified for Quality Management System to ensure the safety and efficacy of the MYLE EMR as a medical device.

s.15(1)(l)
s.15(1)(l) , Microsoft claims the following certifications:

- **SOC 2 (Type II)** – a widely recognized auditing standard issued by the American Institute of Certified Public Accountants (AICPA).
- **ISO 27001** – standard for information security management
- **FedRAMP** – a US government-wide program that provides a standardized approach to security assessment, authorization, and continuous monitoring for cloud products and services.
- **General Data Protection Regulation (GDPR)** compliant

17. What technical and physical security do you have in place to protect personal information?

In using Microsoft Azure to store data, including personal information, the Medfar Clinical Solution shares security and compliance responsibilities with Microsoft. Medfar controls how it architects and secures the MYLE EMR and the data put on the infrastructure, Microsoft Azure is responsible for providing services on its highly secure and controlled platforms and providing a wide array of additional security features.

17.1 Technical security measures related to this initiative consist of:

According to Medfar Clinical Solutions, technical security controls include:

[3] s.15(1)(l)

- s.15(1)(l); s.21(1)
-
-
-

According to Microsoft's s.15(1)(l); s.21(1)
s.15(1)(l); s.21(1)
s.15(1)(l); s.21(1) technical security controls at Microsoft Azure data centres include:

- s.15(1)(l); s.21(1)
-
-

17.2 Physical security measures related to this initiative consist of:

According to Medfar Clinical Solutions, physical security controls at the service provider's premises include:

- s.15(1)(l); s.21(1)

According to information available at s.15(1)(l); s.21(1)
s.15(1)(l); s.21(1) Microsoft s.15(1)(l); s.21(1)
s.15(1)(l); s.21(1) to reduce the risk of unauthorized users gaining physical access to data and the datacenter resources. s.15(1)(l); s.21(1)

- s.15(1)(l); s.21(1)
-
-
-
-
-

18. Controlling and tracking access

Strategy	
We only allow employees in certain roles to have access to information	s.15(1)(l)
Employees that need standing or recurring access to personal information must be approved by executive lead	No. See above.

Strategy	
We use audit logs to see who accesses a file and when	s.15(1)(l)

PART 6: ACCURACY, CORRECTION AND RETENTION

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

Medical practitioners and administrative staff collect personal information directly from the client whenever possible, and indirectly collect personal information in writing from other medical practitioners and service providers. Information in the medical chart stored in the electronic medical records system is updated as part of providing medical care.

20. Requests for correction

FOIPPA gives an individual the right to request correction of errors or omissions to their personal information. You must have a process in place to respond to these requests.

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

Clients may request the correction of errors or inaccuracies and, upon approval or authorization of the physician, a notation will be made in the record.

20.2 Sometimes it's not possible to correct the personal information. FOIPPA requires that you make a note on the record about the request for correction if you're not able to correct the record itself. Will you document the request to correct or annotate the record?

Yes, if it is not possible to correct the information itself, Langara employees will make a note in the individual's medical chart to document that the request was received.

20.3 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 of the request for correction. Will you ensure that you conduct these notifications when necessary?

Yes, Health Services will notify external medical practitioners and service providers when corrections are made to the medical chart when the correction is relevant to client care.

21. Does your initiative use personal information to make decisions that directly affect an individual?

Yes, medical practitioners use clients' personal information to make decisions about medical care.

22. Do you have an information schedule in place related to personal information used to make a decision?

Yes, according to the College's Recorded Information Management Policy B5010, departments must establish and adhere to retention and disposal schedules that ensure that they retain records used to make a decision about an individual for at least one year. Departments' retention schedules must also meet operational and legislative requirements, which typically results in their retaining such records longer than one year.

Records in the electronic medical records system will be retained for 16 years after the date of the last entry recorded in the client's chart. The retention period exceeds FIPPA requirements, conforms to the recommendations of the College of Physicians and Surgeons and exceeds guidelines established by the Canadian Medical Protective Association.

PART 7: AGREEMENTS AND INFORMATION BANKS

23. Does your initiative involve an information sharing agreement?

No.

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

Yes. FIPPA-required personal information bank descriptors consist of:

Name: MYLE Electronic Medical Records system
Data elements: Use of the MYLE EMR includes all data and personal information as outlined in section 3 (above)
Authority: FIPPA section 26(c)
Purpose: Collected, used, and disclosed for providing client care in the MYLE EMR system
Users: Used by medical practitioners and administrative staff in Langara Student Health Services.

PART 8: ADDITIONAL RISKS

25. Risk response

Describe any additional risks that arise from collecting, using, storing, accessing or disclosing personal information in your initiative that have not been addressed by the questions on the template.

Not applicable.

PART 9: SIGNATURES

Privacy Office Comments

This PIA is based on a review of the material provided to the Manager, Records Management and Privacy by Langara Student Health Services or obtained from Medfar Clinical Solutions and Microsoft as of the date below. If in future any substantive changes are made to the scope of this PIA, Langara Student Health Services will contact the Manager, Records Management and Privacy who will complete a PIA Update.

s.22(1)

Joanne Rajotte, Manager
Records Management and Privacy

Jan. 3, 2023
Date

Program Area Signatures:

Role	Signature	Date signed
Initiative Lead & Department Manager: Dr. Christine Singh, Medical Director, Langara Student Health Services	s.22(1)	Jan 5/ 2023
Contact Responsible for Systems Maintenance and/or Security: Charles Boname, Associate Director, IT Cyber Security		JAN. 5, 2023
Head of public body, or designate: Deborah Schachter, Associate Vice-President, Students		February 14, 2023