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Demystifying the **PRIVACY IMPACT ASSESSMENT** and Streamlining the Process

Privacy Impact Assessment

Three little words that have caused numerous pharmacists a great deal of frustration and countless hours of work. As healthcare professionals the last thing we want is more paperwork, and in the case of the Privacy Impact Assessment (PIA), these hours add up rather quickly. In my few months at RxA I have heard you, and I share your agony. So here I am prepared to give you the straight goods on the PIA process!

What is it really all about?

The PIA is a process that assists organizations in reviewing the impact that a new project may have on individual privacy. The process is designed to ensure that the custodian (in our case, the pharmacist) evaluates the program to ensure compliance with the *Health Information Act* (HIA). The PIA is divided into two parts; Part A addresses the pharmacy's privacy practices and policies that enable the HIA, while Part B addresses the privacy implications of the specific project (such as Alberta Netcare Portal) or a change in business process.

Why even do one?

Simply put, it's required by law (HIA s. 64) and without one you can't implement Alberta Netcare Portal 2006 (recently renamed Alberta Netcare Portal). This PIA must then be submitted and subsequently accepted by the Office of the Information and Privacy Commissioner (OIPC) of Alberta. In the near future the

older versions of Netcare Portal supporting pharmacy batching will be decommissioned, which in turn will require that all pharmacies upgrade to Alberta Netcare Portal. As a result, completing a PIA has now become a sign of the times.

The truth...

is that Part A of the PIA is something that all pharmacies should already have in place. Your answers to Part A are based on your pharmacy's unique HIA policies and procedures. Your pharmacy's HIA policies and procedures should have been in place shortly after the HIA became legislation in 2001. Didn't do them? You're not alone! Thought your corporate Head Office did them and simply forget to share them with you? Don't bet on it! If you haven't done them, now is the time to get them written down and put into practice.

RxA produced a *HIA - Guide to Policies and Procedures for Pharmacists and Pharmacies* (May 2004). This guide walks pharmacists through the process of writing appropriate policies and procedures that relate to how health information is managed at your pharmacy and comply with the HIA. These HIA policies and procedures are extremely important and required by law (HIA s. 63). If the OIPC were to conduct an investigation of how health information is handled in your pharmacy, the first thing they would ask to see is your HIA policies and procedures.

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RxA also produced a *HIA – Guide to Privacy Impact Assessments for Pharmacists and Pharmacies* (May 2004), which leads pharmacists through the PIA questionnaire process. However, even with these tools the OIPC has only accepted just under fifty PIAs. Recognizing that all pharmacies in the province must now complete a PIA for Alberta Netcare Portal, the OIPC has acknowledged that pharmacies could use a little more help getting through this daunting process.

To help...

pharmacies implement Alberta Netcare Portal, RxA and OIPC have worked together to streamline the PIA process. OIPC originally developed a PIA questionnaire to help custodians; however for this specific project OIPC will accept a simplified format. In lieu of the PIA questionnaire the pharmacist can submit: a letter outlining the project; your pharmacy's HIA policies and procedures (in place of Part A); and an acknowledgement that you are familiar with the Alberta Netcare Portal PIA Part B and understand that you are responsible for it in your store.

In a nutshell, provide the OIPC with:

- 1) A letter indicating that you will participate in Alberta Netcare Portal;
- 2) Your pharmacy's HIA policies and procedures;

RxA will be administering a grant that will provide you with resources to meet these project requirements. The expected timeframe for the availability of these resources is spring 2008. Please contact me by email (margaret.wing@rx.ca) to be put in touch with the PIA consultant group. These consultants will provide you with assistance and help you individualize both the letter and the generic HIA policies and procedures.

The letter outlines the project and acknowledges the custodian's responsibilities and obligations in participating in the Alberta Netcare Portal.

The Generic Rx HIA policies and procedures can be reviewed, adapted and accepted by your pharmacy. It is imperative that you review and understand all the identified policies to ensure your pharmacy complies with the HIA and in turn reflects your organizational privacy management procedures. These generic Rx HIA policies and procedures also take into consideration the Health Information Amendment Act that came into affect in 2006.

The Alberta Netcare Portal PIA Part B has already been completed by Alberta Health and Wellness. However, as a custodian governed by the HIA, you must still understand your responsibilities and obligations in participating in Alberta Netcare Portal and acknowledge that you are familiar with Alberta Health and Wellness' Part B. RxA and Alberta Health and Wellness are working to provide an overview of the Netcare Portal PIA to help you understand your responsibilities as a custodian and a user of this system.

With acceptance of this PIA, you will be well on your way to Alberta Netcare Portal. Of course, there are a few more hurdles such as the Organizational Readiness Assessment (ORA), however your Alberta Netcare Transition Coordinator will provide templates and help you complete your ORA.

And then System 2 System (S2S) is just around the corner.....

References

<http://www.oipc.ab.ca/pia/>