



IAR Consent Management training given to HSPs

Update to Vendors

CCIM Privacy and Security training efforts

- Since May 2011, CCIM has trained over 200 Health Service providers in the CSS, CMH, LTCH and IN-patient mental health sectors
- HSPs each attended three training sessions about Privacy and Security, and Consent, totaling 15 hours each
- The next round of training for HSPs implementing after November 15th is beginning now.

IAR Consent Management

- Enables client control over how their personal health information (PHI) is collected, used, disclosed and shared
- Supports a clear and comprehensive consent management process to ensure compliance with PHIPA

Consent Management Process — Key Activities

Inform

Make sure the client understands the 5 topics. Suggest documenting that informing happened

Obtain

Either implied OR express are valid

Record

In a central location for tracking and reconciliation

Register

Linked to each assessment. Must be update-able

Enforce

Manual enforcement in a paper system. Software enforces in IT realm

Collection, Use and Disclosure

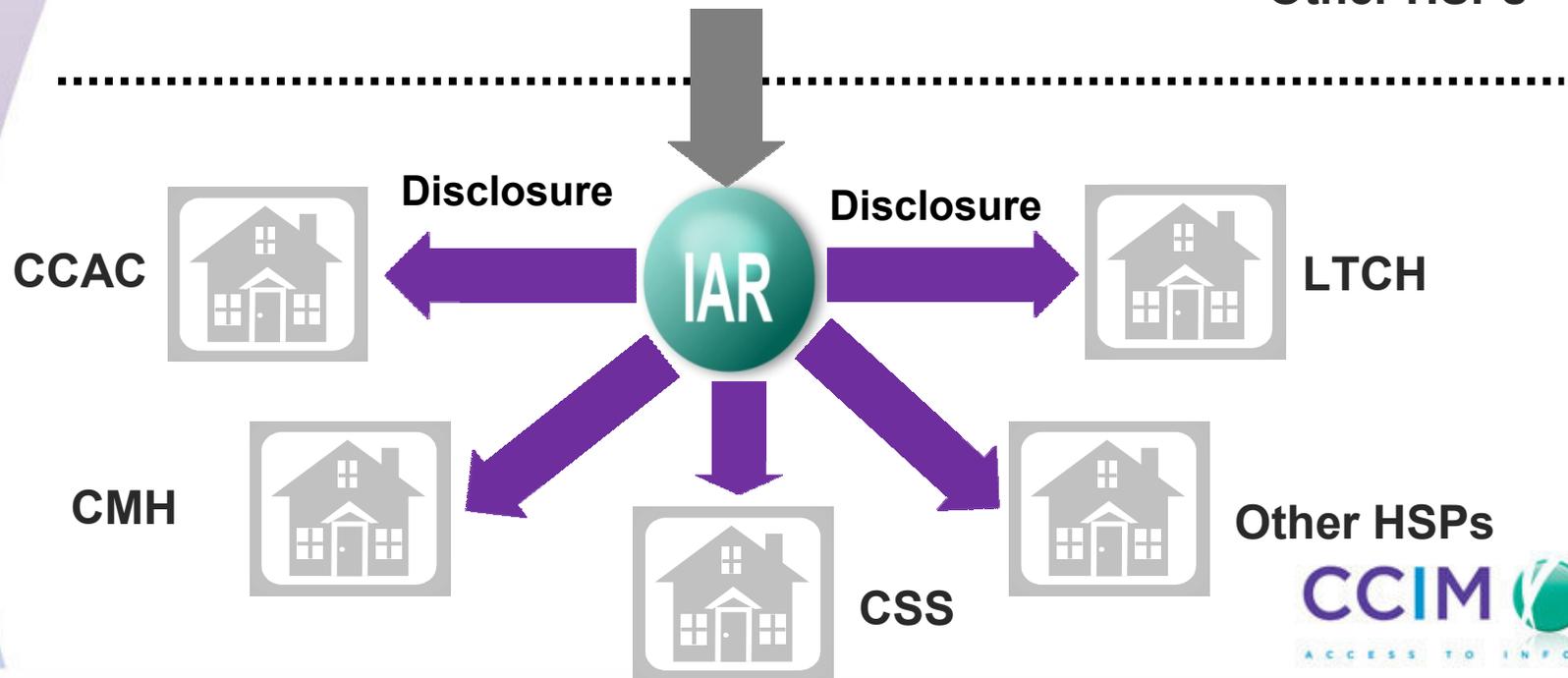
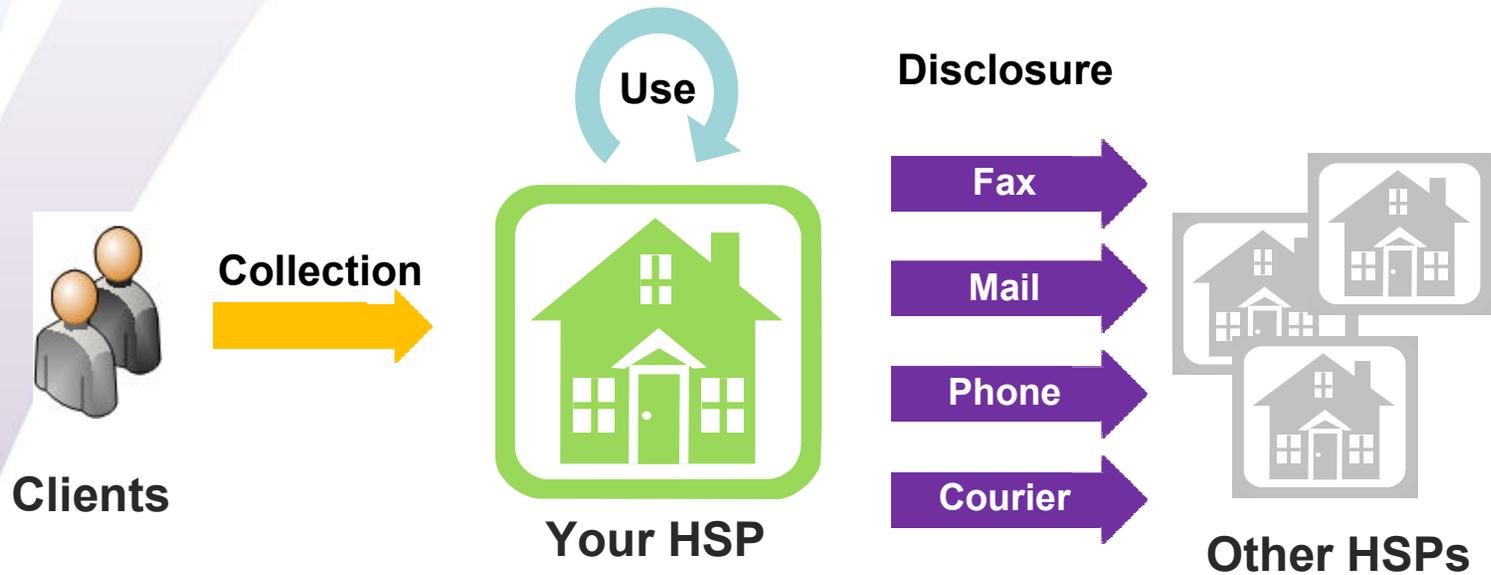
Privacy activities are described using three terms:

Collect: An HSP has 'collected' PHI when it has gathered, acquired, received or obtained information about a client by any means from any source.

Use: An HSP 'uses' PHI when it handles or deals with PHI that it has collected.

Disclose: An HSP discloses PHI when it makes information in its custody available to other HSPs or to other people outside of the HSP.

Collection, Use and Disclosure of Assessments



Consent Model

IAR supports two levels of Consent Directive:

- **HSP level Consent Directive applied to the assessments collected by the individual HSP**
- IAR level Consent Directive applied to all assessments in IAR relating to a client

HSP-Level Consent Directive

- HSP will obtain consent/Consent Directive from the client and register the consent in the assessment tool
 - Consent Directive, along with the assessment, will be uploaded to IAR
 - IAR will inherit the consent flag submitted along with individual assessment and automatically enforce the Consent Directive in IAR
 - Consent may also be provided at the “client level”, where a client wishes to withdraw or provide consent for sharing ALL their assessments
- Alternatively the HSP can login to the IAR consent interface to register the Consent Directive manually
 - Only the assessments from the HSP will be affected

HSPs need to determine if their software can upload the consent flag, or if they will need to do this manually.

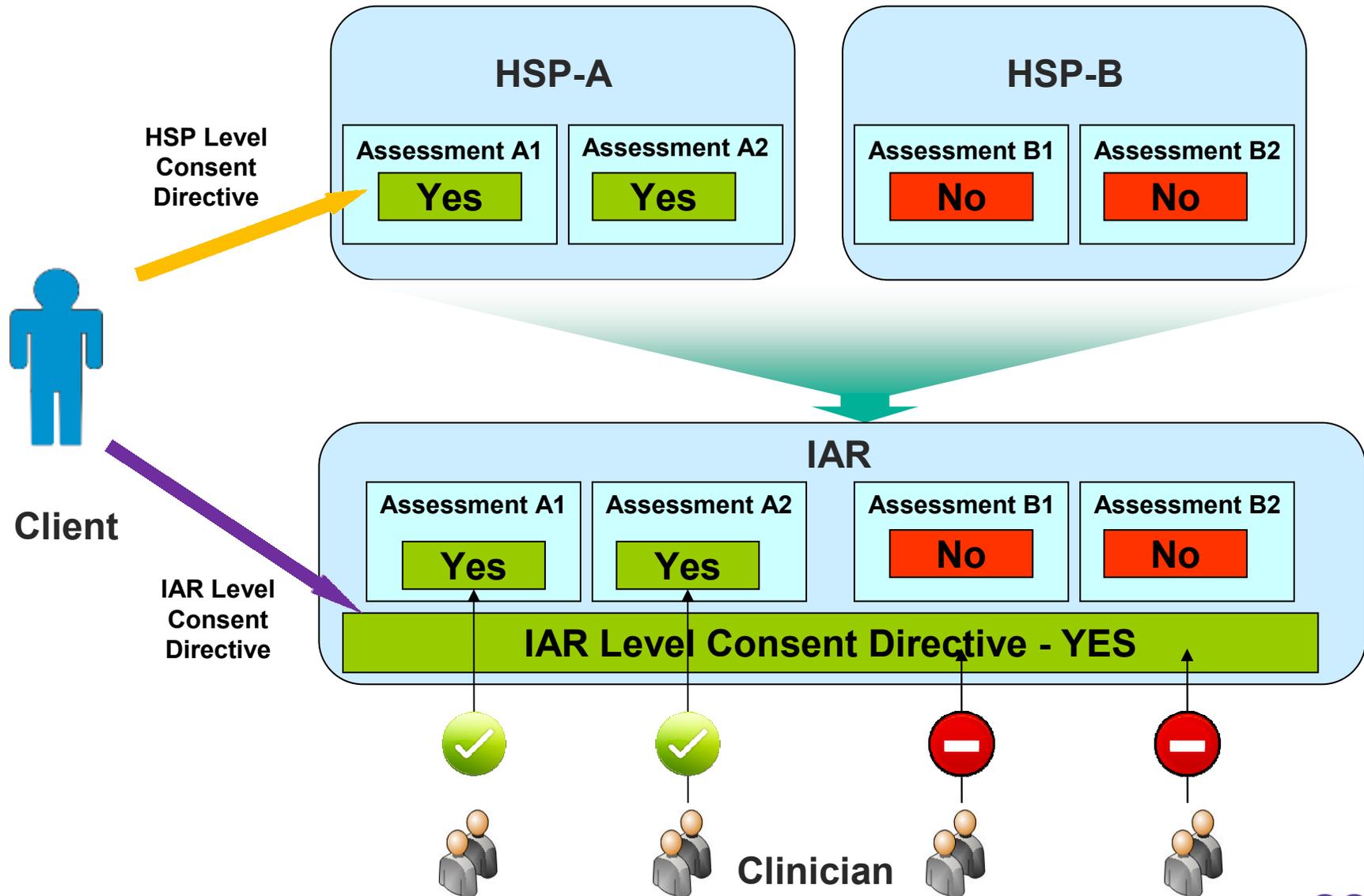
Consent Management: Initial and Update

- Consent management includes two slightly different processes, both of which need to be managed:
 1. Collect Consent Directive
 2. Update Consent Directive

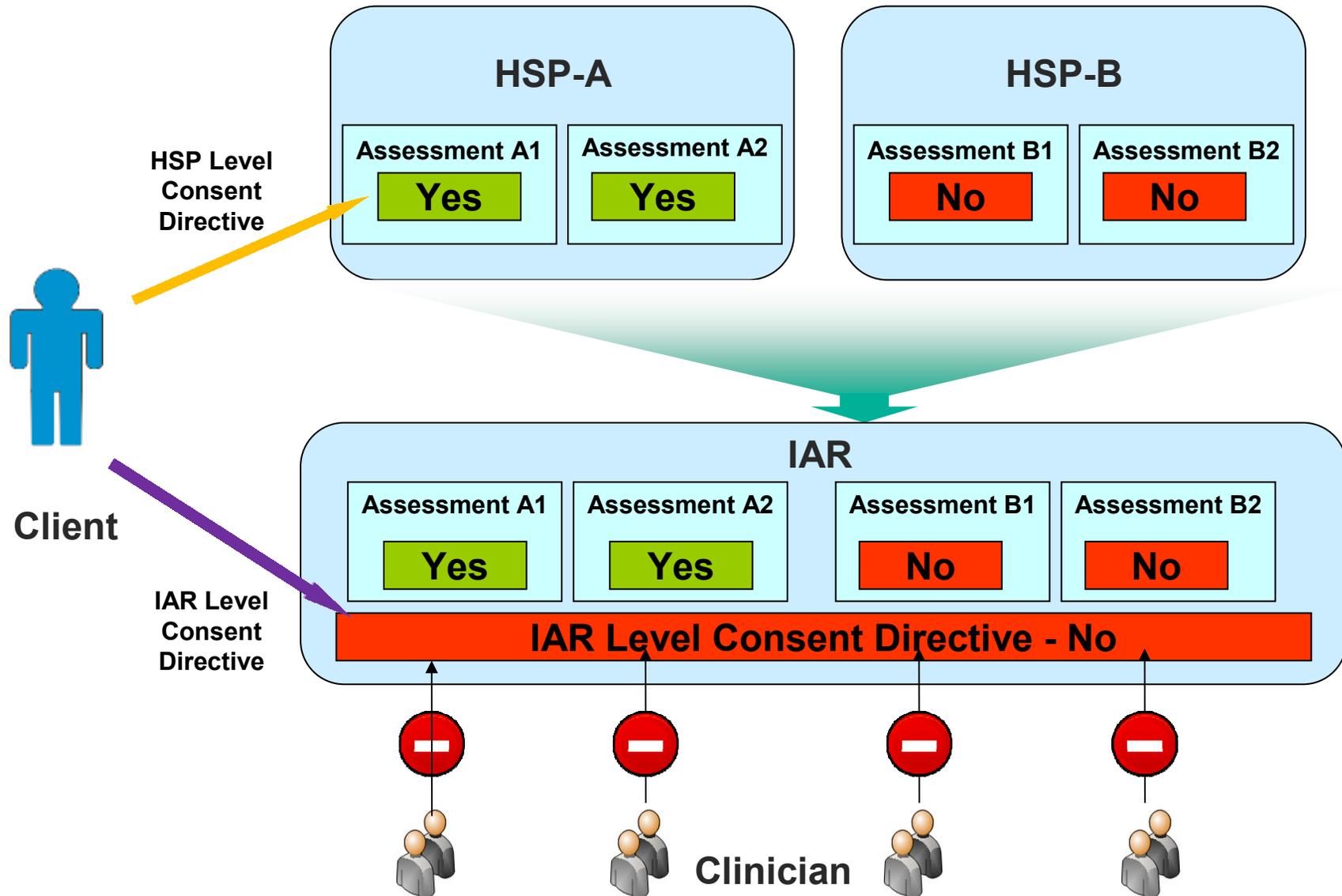
IAR-Level Consent Directive

- The client can call the Consent Call Centre (**1-855-585-5279**) to register the IAR-level Consent Directive:
 - Consent to share in the IAR means all of the client's assessments across HSPs will be shared with participating HSPs that provide care to the client
 - If consent is withheld in the IAR, all of the client's assessments already in the IAR, and uploaded in the future, will be locked and participating HSPs will **not** be able to view them
- The more restrictive Consent Directive (either HSP-level or IAR-level) will be enforced

How Consent Works in IAR



How Consent Works in IAR (Cont'd)



Group Discussion: Recording and Registering Consent

	Record	Register	Update
<i>Where ?</i>			
<i>When ?</i>			
<i>Who ?</i>			

Summary of consent functionality from a Health Service Provider perspective

1. Any assessment to be uploaded to the IAR requires that a consent directive first be obtained from the client.
2. Assessment software must provide a feature that allows the HSP user to manage the client's consent for sharing their assessment.
3. We recommend that the consent directive be obtained prior to or at the time the assessment is gathered, not after the fact.
4. The consent directive to share assessments should not be tied to uploading of assessments.
5. HSPs may wish to enter a consent directive at the "client" or "patient" level, or for each assessment. We recommend that both options be available, so that if a client wishes to "grant" or "deny" the sharing of all assessments, this be able to be set once at the client level – or if a client wishes to share or hide some assessments, then a consent flag to grant or deny should be available for each assessment as mentioned in #3 above.

Summary of consent functionality from a Health Service Provider perspective

6. Assessments sent to the IAR that have a Deny (not share) directive are not shown (shared) with any HSP, not even the HSP that uploaded the assessment (but they can still view it in their source software).
7. Assessments that have a change in consent from the client are to be re-uploaded to the IAR reflecting the change.
8. Any client may request all assessments be not shared (hidden) from any organization by contacting the Consent Call Centre at 1-855-585-5279 . This consent flag is stored separately.

Consent Language suggestions

Vendors Identified a need for appropriate language for collecting consent

Consent for Sharing an assessment

Yes	No
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- Does the Patient/Client consent to the sharing of their assessment? *[Vendors to determine how to identify which assessment this consent directive relates to, either using an assessment ID, or start date of assessment, or other option]*

Additionally, a client level consent could be added somewhere in a different area of the software that would set all the individual consent flags to grant or deny as follows:

Yes	No
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- Does the Patient/Client consent to the sharing of **all of their assessments?**

Please note vendors are free to present this question, within their user interface as per their own design.