

# KINGSTON HEALTH SCIENCES CENTRE

## ADMINISTRATIVE POLICY MANUAL

**Subject:** Health Information Network Provider (HINP)

**Number:** 01-165

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### **Principle:**

Kingston Health Sciences Centre (KHSC) will establish standards and practices to ensure compliance with legislation where the hospital will provide services to other health information custodians (HIC's) as a means to disclose personal health information (PHI) to one another.

### **Definitions:**

*Personal Health Information (PHI):* In the Act is described as "Identifying information about an individual in oral or recorded form" as it:

- a. Relates to the physical or mental health of the individual, including information that consists of the health history of the individual's family;
- b. Relates to the providing of health care to the individual, including the identification of a person as a provider of health care to the individual;
- c. Is a plan of service within the meaning of the Long-Term Care Act, 1994 for the individual;
- d. Relates to payments or eligibility for health care in respect of the individual;
- e. Relates to the donation by the individual of any body part or bodily substance of the individual or is derived from the testing or examination of any such body part or bodily substance;
- f. Is the individual's health number; or
- g. Identifies an individual's substitute decision-maker.

*Health Information Network Provider (HINP):* Under s. 10(4) of the Personal Health Information Protection Act (PHIPA) and ss. 6(3) of Regulation 329/04 made under PHIPA, an agency who provides services to two or more HIC's, where the services are provided primarily to custodians to enable the custodians to use electronic means to disclose PHI to one another.

### **Policy:**

1. When KHSC provides service to health information custodians, KHSC may undertake the role of a HINP. A HINP is a prescribed category of persons who provide services to HIC's, regulated under PHIPA.
2. Where KHSC is acting as a HINP, it must comply with the law and in addition, where KHSC is not acting as an agent of the HIC's to which it provides HINP services, KHSC must comply with additional requirements applicable to electronic service providers under Regulation 329/04, ss. 6(1).
3. Under this policy, KHSC shall protect PHI handled in its capacity as a HINP by employing procedures to meet the privacy and security requirements. This policy supplements Policy 01-221, Privacy Practices, which provides a framework for privacy practices across the agency and ensures the protection of PHI in the custody or under the control of KHSC.
4. Where there is a discrepancy between this policy and PHIPA, PHIPA takes precedence.
5. A procedure document will be held in the Privacy Office that outlines legislative requirements for privacy and security practices. The HINP Procedure will be reviewed every two years, or as needed to make regulatory or operational changes.