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Launch of the draft OHT privacy management and data sharing (PMDS, or privacy) toolkit

4 November 2026

Overview

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- **Introduction**
  - RISE-convened support team
  - Context for the development of the new toolkit
- **Privacy management and data sharing (PMDS or privacy) toolkit** → feedback welcome!
  - Briefings: 1) OHT executives and governors; 2) Primary Care Network (PCN) Clinical Leads
  - Privacy-management essentials: 1) small primary-care practices and other small healthcare organizations; 2) staff
  - Privacy models for information sharing (use case-derived examples, and observations about trust, to be added soon)
  - Libraries: 1) use cases (14; coming soon); and 2) scenarios (with more scenarios to be added soon)
  - OHT capabilities self-assessment survey
  - Q&A additions
- How to provide feedback on the draft tools
- Reminders about the complementary data sharing agreement (DSA) toolkit & related implementation supports
- Q&A with our support team
- Evaluation poll

RISE-convened support team for data sharing and privacy

- Daniel Michaluk, National Co-Leader, Privacy & Cybersecurity, Borden Ladner Gervais LLP (BLG)
- Katherine Kresta, Senior Consultant, MD+A Health Solutions
- Lauren Black, General Counsel & Chief Legal, Privacy and Compliance Officer, VHA Home HealthCare
- Convenors
  - John Lavis, Co-lead, RISE | McMaster Health Forum
  - Kaelan Moat, Managing Director, RISE | McMaster Health Forum

Context for the development of the new toolkit

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- OHT DSA toolkit (finalized version launched on 14 July) and OHT privacy toolkit (draft being launched today for input, and finalized version will be made available before the end of 2026)
  - Positive framing (data sharing to achieve OHT deliverables & PCN expectations) & 'negative' framing (privacy)
  - Goal (data sharing to achieve OHT deliverables & PCN expectations) and a constraint in achieving it (privacy)
- Alignments to TPA deliverables
  - Primary care (PC) access, attachment and enablement, including PCNs, PCN Clinical Leads, provincial digital priorities (e.g., Central Intake, eReferral, Mental Health and Addictions Provincial Coordinated Access, and Online Appointment Booking), and cancer-screening participation
  - Integrated clinical priorities, including chronic disease prevention and management (CDPM) and Alternative Level of Care (ALC) planning
  - OHT capacity building, including OHT membership expansion and engagement-capable environments
  - Funding for PC access and attachment, including attachment targets, submissions for new or expanded Interprofessional Primary Care Teams, clinical services for unattached patients, Supported Attachment model, Initial 12-specific activities, and lower-limb preservation (LLP) integrated clinical pathway

Effective data sharing is foundational to advancing integrated care, enabling coordinated clinical pathways, implementing programs, monitoring performance across OHTs/PCNs and their member organizations, and responding directly to challenges identified by OHTs as barriers to integrated-care delivery

Context for the development of the new toolkit (2)

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- Draft toolkit was developed in partnership with Ontario Health, and with **input** from
  - Privacy experts (Daniel, Katherine and Lauren)
  - OHTs that completed the self-assessment survey (and we are creating slides with key findings)
  - OHT representatives participating in interviews about the use cases in which their work is profiled
  - OHT and regional representatives participating in our drop-in sessions and workshop series
- Tools 1, 3 and 4 drew heavily from the IPC privacy-management handbook for small healthcare organizations; tool 5 drew from work by Katherine Kresta
- Also built on the province-wide needs assessment – engaging 15+ OHTs and 100+ providers – that identified: 1) uneven privacy knowledge; 2) variable readiness for and uncertainty navigating PHIPA across multi-sector partnerships within OHTs; and 3) broader gaps in privacy governance, processes and technology as key barriers to implementation
- Toolkit gives particular attention to the key provincial priority of primary-care enablement and to addressing the particular challenges faced by small primary-care practices and organizations that were revealed through the self-assessment survey (both with content and with formats, such as each tool being ‘short and sweet’ and focused on actionable insights for busy primary- and integrated-care clinical and executive leaders)
- We welcome **input on the draft tools**; please send your feedback to rise@mcmaster.ca
- We hope to make available the finalized version of the toolkit by the end of 2026

Overview of the toolkit

(and note that tools 1-4 have an optional appendix with links to all DSA and PMDS tools)

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Tools	Purpose	Description
Tool 1: Briefing on privacy management and data sharing (PMDS) for OHT executives and governors (and OHT member organization executives)	Provides the context for and key actions involved in (& resources for) • **leading and governing** an effective PMDS program within & across member organizations	Three-plus page briefing; see IPC handbook from which the lists here & below were drawn
Tool 2: Briefing on PMDS for PCN Clinical Leads (and PCN leadership councils)	• **supporting** primary-care practices in building an effective PMDS program	Three-and-a-half page briefing
Tool 3: Privacy-management essentials for physicians, nurse practitioners and other professionals working in small primary-care practices and healthcare organizations	Lists the key actions involved in (& resources for) • **building** an effective PMDS program in primary care and other small healthcare organizations	Two-page table
Tool 4: Privacy-management essentials for staff of health and community care organizations	• **operationalizing** an effective PMDS program at the staff level	Two-page table

Overview of the toolkit (2)

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Tools	Purpose	Description
Tool 5: Privacy models for information sharing	Illustrates three privacy models for data sharing	One-page description
Tool 6: Use-case library	Describes how 14 OHTs have approached six PMDS use cases (e.g., primary-care access and attachment to chronic disease prevention & management, cancer screen participation, and secure messaging)	One-page overview and 14 one-page descriptions in a clickable format
Tool 7: Scenarios library	Describes two scenarios: 1) privacy breaches; and 2) third-part technology service providers and shared systems, with more to be added if/when identified	One-page description Case of Note 1 and 2
Tool 8: OHT capabilities self-assessment survey	Provides 46 questions that allow an OHT – working in partnership with its member organizations – to assess its data sharing and privacy capabilities	Six-page document (originally available as an online survey)
Tool 9: Q&A addition	Provides an additional question and response	Half page that will be added to DSA tool 1 (see previous page)

Tools 1 and 2: Briefings for busy clinical and executive leaders and for governors (to get them on board for accelerated efforts)

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Tool 2: Briefing on PMDS for PCN Clinical Leads (and PCN leadership councils)	• **supporting** primary-care practices in building an effective PMDS program	Three-and-a-half page briefing

- Context for leading & governing (tool 1) & for building (tool 2) an effective PMDS program within & across member organizations:
  1) Data sharing needs to be the 'new normal' to achieve OHT deliverables and PCN expectations
  2) Four examples of data sharing in primary and integrated care
  3) Four 'personas' involved in PMDS in primary and integrated care
- Key actions involved in (& resources for) leading and governing (tool 1) and building (tool 2) an effective PMDS program
  1) At the level of the OHT and PCN: tone/culture and CDMA
  2) For any primary- and integrated-care initiative that involves PMDS: DSA and service-provider agreement (and noting that the DSA has a schedule D that speaks specifically to service providers)
  3) At the level of a member organizations, particularly PC practices: encourage them to use tools 3 and 4

Tools 3 and 4: Privacy-management essentials for busy clinicians and staff (to help them efficiently do what they need to do)

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Tools	Purpose	Description
Tool 3: Privacy-management essentials for physicians, nurse practitioners and other professionals working in small primary-care practices and healthcare organizations	Lists the key actions involved in (& resources for) • **building** an effective PMDS program in primary care and other small healthcare organizations	Two-page table
Tool 4: Privacy-management essentials for staff of health and community care organizations	• **operationalizing** an effective PMDS program at the staff level	Two-page table

- Governance and accountability: tone/culture, privacy officer, PHI inventory, service-provider agreements, and business continuity and disaster recovery plans (plus succession plan)
- Policy (what and why): written privacy policy and public privacy notice
- Safeguards: security controls (technical, physical, administrative); specific safeguards (email and secure messaging applications, videoconferencing, AI, mobile devices); logging, auditing and monitoring
- Procedures (how): confidentiality agreements, attestation forms, training, access controls, record-keeping practices, recording retention and destruction procedures, privacy breach response protocol, breach log, and patient-response procedures
- Monitoring and review

Recall that all staff may receive PHI by mistake, may be the subject of a phishing attempt, or may suspect a cybersecurity incident (and you may want to include appropriate responses in employment contracts)

Tools 5, 6 and 7: Privacy models and libraries for use cases and scenarios

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Tools	Purpose	Description
Tool 5: Privacy models for information sharing	Illustrates three privacy models for data sharing	One-page description (use case-derived examples, and observations about trust, coming soon)
Tool 6: Use-case library → Coming soon	Describes how 14 OHTs have approached six PMDS use cases (e.g., primary-care access and attachment to chronic disease prevention & management, cancer screen participation, and secure messaging)	One-page overview and 14 one-page descriptions in a clickable format
Tool 7: Scenarios library	Describes two scenarios: 1) privacy breaches; and 2) third-part technology service providers and shared systems, with more to be added if/when identified	One-page description Case of Note 1 and 2 (with more scenarios to be added soon)

- Tool 5
  - Key concepts and terms: PHI, HIC, HIC-Agent, HINP
  - Three models – 1) singe custodian for a single system; 2) single custodian for a shared system; 3) multi-custodian for a shared system – plus how each works and the strengths and approach to address risk
- Tool 6 (not yet posted to the RISE website)
  - Awaiting the final interviews with OHTs and approvals of the draft text by participating OHTs
- Tool 7
  - Two of the most relevant IPC 'Cases of Note'

How to provide feedback on the draft tools

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- Please send your feedback to rise@mcmaster.ca, including
  - Key messages about what should be emphasized (more), added, changed, corrected or dropped → three examples from yesterday's workshop:
    - Add a PMDS chart to every project agreement (who's the HIC, who's the technology provider, who if anyone is acting as a HINP?)
    - Consider trust at the level of member organizations and service providers, not just among patients
    - Include in employment contracts what staff – particularly those who don't normally handle PHI – should do if they receive PHI by mistake, are the subject of a phishing attempt, or suspect a cybersecurity incident
  - Feedback about whether
    - Intended audience and purpose of each tool is clear
    - Guidance is sufficiently practical for organizations with limited PMDS capacity
    - Any statements are unclear
  - Suggestions for additional resources that can be linked to
- Attend the DSP drop-in sessions where you can ask questions and provide feedback
  - Nov 11 (1-1:30)
  - Dec 7 (1:30-2)

Reminder about the complementary data-sharing agreement (DSA) toolkit (launched on 14 July)

→ see link to the RISE website where all of these resources can be found

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- DSA template
- Four tools to support DSA
  - Frequently asked questions (FAQ)
  - Decision tree
  - Roadmap for ‘new project’ data sharing and governance
  - Data sharing ‘role’ decision framework

Reminder about the additional implementation supports

→ see link to the RISE website where you can register for implementation supports 1 & 2

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1) Workshop training series
   a) Nov 19 (8-9): **PCN-wide initiatives** (recognizing it's a busy period for OHTs and PCNs due to IPCT-related activities and deadline)
   b) Nov 30 (9-10): **DSA and privacy risk**
   c) Dec 15 (3-4): **Multi-party DSAs for integrated primary care**
2) Drop-in sessions
   a) Nov 11 (1-1:30): **Privacy toolkit questions and feedback**
   b) Dec 7 (1:30-2): **Privacy toolkit questions and feedback**
   c) Jan 11 (1:30-2) : **Privacy toolkit questions, with a focus on the now finalized versions of the tools**
3) Pulse check survey (with communications to OHTs beginning the week of Nov 23)
4) Community of practice (CoP) on Quorum (already live, and with an invitation to OHTs join the CoP beginning the week of Nov 23), as well as complementary ones to support PCN Clinical Leads
5) Updated or 'living' versions of DSA tools (as needed)

Q & A with our support team
(and with the evaluation poll posted five minutes before the end)

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Facilitator
- John Lavis, Co-lead, RISE

Panelists
- Daniel Michaluk, National Co-Leader, Privacy & Cybersecurity, Borden Ladner Gervais LLP (BLG)
- Katherine Kresta, Senior Consultant, MD+A Health Solutions
- Lauren Black, General Counsel & Chief Legal, Privacy and Compliance Officer, VHA Home HealthCare