

Policy on Health Facility Identifiable Information, July 2015

Purpose

The purpose of this Policy is to provide to the public, policy-makers, managers and data providers within the health system improved, objective information about health and health care in Canada in a transparent manner. The Policy establishes a framework within which CIHI can publish, release and make publicly available Health Facility Identifiable Information in a manner that is consistent with federal, provincial and territorial privacy legislation. As a prescribed entity under the Ontario *Personal Health Information Protection Act*, CIHI is committed to safeguarding Personal Health Information.

Scope

The Policy addresses

1. the release of Health Facility Identifiable Information by CIHI; and
2. third-party requests for Health Facility Identifiable Information by name.

Definitions

“CIHI’s Privacy Policy” means CIHI’s publication *Privacy Policy on the Collection, Use, Disclosure and Retention of Personal Health Information and De-Identified Data, 2010*, as may be amended by CIHI from time to time.

“Health Facility” means any institution in a province or territory in Canada that, in part or in whole, provides health services. A health facility includes but is not limited to: acute care/ specialty hospitals; long-term care facilities; ambulatory agencies such as outpatient clinics, rehabilitation centres, community health centres and home care agencies.

“Health Facility Identifiable Information” means information that directly identifies a Health Facility by name.

“Personal Health Information” means health information about an individual that identifies the specific individual or may be used or manipulated by a reasonably foreseeable method to identify the individual, or may be linked by a reasonably foreseeable method to other information that identifies the individual.

“Termination of Pregnancy Data” is a broad term used by CIHI that encompasses abortion data.

Exceptions

The Policy does not apply to

1. Quebec Health Facility Identifiable Information

No Quebec Health Facility Identifiable Information may be released by CIHI to third parties.

2. Termination of Pregnancy Data

No record-level data or aggregate volume statistics containing Health Facility Identifiable Information directly related to termination of pregnancy may be released by CIHI to third parties.

3. Statistics Canada Survey Data

- a. Residential Care Facility Survey.
- b. Long-term Care Facilities Survey.

Policy

Release of Health Facility Identifiable Information by CIHI

1. In carrying out its mandate and being transparent in reporting health information, CIHI may publish, release and make publicly available Health Facility Identifiable Information.
2. Generally speaking, CIHI will treat for-profit and not-for profit health facilities in the same way. In preparation for publication, release and making publicly available some of its information, CIHI will follow its existing validation, embargo and dissemination policies and procedures.
3. CIHI will not publish, release or make publicly available Health Facility Identifiable Information that also reveals Personal Health Information, except as required or authorized by law, or with the consent of the individual to whom the Personal Health Information relates.
4. CIHI will not publish, release or make publicly available Health Facility Identifiable Information where the disclosure is prohibited by law.
5. In limited and specific cases, CIHI may decide not to publish, release or make publicly available Health Facility Identifiable Information where in its view, for example,
 - a. the methodology, the data and/or the results are not meaningful or accurate; or
 - b. the information is commercial in nature (e.g., details regarding the buying, selling or exchange of merchandise or services), is certain types of financial information (e.g., profit and loss data) or is proprietary information (e.g., business systems owned in whole or in part by the organization).

Third Party Requests

6. CIHI will generally disclose Health Facility Identifiable Information to third parties without any requirement for prior authorization from the data provider or relevant ministry of health, subject to any requirements imposed by the jurisdictions.
7. Where the third party intends to publicly release Health Facility Identifiable Information, the requirements set out in the “Procedures for the Implementation of the Policy on Health Facility Identifiable Information” must be met.

Related Policies and Procedures/Supporting Documents

Procedures for the Implementation of the Policy on Health Facility Identifiable Information

For more information, please contact

Privacy@cihi.ca

Revision History			
Date (Year/Month)	Version	Description of Revisions	Approval Authority
2008 March	1.0	Initial publication	CIHI Board of Directors
2013 July	1.1	Introduced the <i>Guidelines for the Implementation of the Policy on Health Facility Identifiable Information</i>	CIHI Executive Committee
2014 March	2.0	Policy amended to allow disclosure of facility-level information by name without prior authorization of data provider or relevant ministry of health.	CIHI Board of Directors
2014 May	2.1	Reference to “Guidelines” changed to “Procedures”	N/A
2015 June	2.2	<ul style="list-style-type: none"> • Added two more Exceptions to the Policy: <ul style="list-style-type: none"> – Termination of Pregnancy Data – Statistics Canada Survey Data • Added the definition of Termination of Pregnancy Data 	Senior Management Committee