Trustee Guideline for Monitoring PIP Usage

This guideline provides recommendations regarding the monitoring of PIP usage within Trustee organizations using PIP. These recommendations will assist Trustees in the establishment of a regular monitoring program. Trustees are ultimately responsible for the collection, use, disclosure and protection of patient health information within their organization; therefore it is incumbent on them to monitor the access to this information by staff within their Trustee organization.

Who should be monitoring access?
Each PIP Approver at a pharmacy Trustee Organization should be assigned responsibility for monitoring the PIP access of all those individuals approved for access to PIP by that PIP Approver.

How often should monitoring take place?
The frequency of monitoring PIP usage should be determined by the volume of accesses and the number of users with access to the PIP application. Where volumes of accesses are heavy for a particular Trustee organization, the frequency of monitoring should increase. It is important that monitoring be completed on a regular basis, with a minimum frequency of at least once per month. This allows any inconsistencies with access to be addressed in a timely manner thereby protecting both patient information and the Trustee.

How do I monitor use?
The web-enabled version of the PIP application has a built-in tool for monitoring PIP usage. Every user of PIP can view his or her own usage, while PIP Approvers can monitor usage for all users for a given location. If you require refresher training regarding the use of this tool, please go to https://pip.ehealthsask.ca and review the training session ***Approvers***.

What should I look for when monitoring?
Based on interactions with patients, each Trustee should have a good idea about how and when patient data is accessed within PIP. Some, but not all, areas that should be reviewed include:
- same last name or family member profile accesses;
- frequency of patient profile accesses within a given time period;
- patient profile access outside normal work hours;
- profile accesses without a matching, appropriate service event.

Ultimately, the goal of monitoring PIP profile accesses is not to revisit every event for every user.
The objective is to identify those situations that appear to be out of the ordinary and to follow up on those situations. The monitoring of PIP access ensures a balance between patient privacy and the provision of quality healthcare

What if I find an access that warrants further investigation?
The PIP Approver should consult with the Trustee organization's Privacy and Security Officer. In cases where unauthorized access of patient data has occurred, the Privacy and Security Officer should report the situation to the Ministry of Health, Chief Privacy Officer. Currently, the contact person in that office is Sara Hawryluk and she can be reached at (306) 798-2648.

What if I have additional questions?

If you have questions regarding this document or PIP, please contact your eHealth Saskatchewan Transition & Change Management Coordinator or direct your request to the eHealth Saskatchewan Service Desk at 1-888-316-7446.