Privacy and Security Requirements Cross Mapping

Date: 2018-03-19

Version: 1.0

Status: Final

Purpose

The purpose of this document is to provide a bi-directional mapping of Canada Health Infoway's (Infoway) Privacy and Security Assertions to OntarioMD's Privacy and Security Requirements. The mapping information can be used by electronic medical record (EMR) vendors certified by one organization to understand which requirements from the other organization their EMR offering may already meet. This mapping information helps to reduce the time needed for analysis.

Note that Infoway and OntarioMD both have different certification and validation processes. The mapping information provided in this document does not necessarily mean that EMR vendors will not be validated on requirements deemed equal or equivalent. Please contact Infoway or OntarioMD for more information on how certification with one organization will alter the other organization's validation activities.

Infoway: certificationservices@infoway-inforoute.ca

OntarioMD: emr@ontariomd.com

Mapping Interpretation

This section is divided into two subsections:

1. Infoway to OntarioMD – contains the mapping of Infoway assertions to one or more OntarioMD requirements. This is for vendors with an EMR offering certified by OntarioMD seeking Infoway certification.
2. OntarioMD to Infoway – contains the mapping of OntarioMD requirements to one or more Infoway assertions. This is for vendors with an EMR offering certified by Infoway seeking OntarioMD certification.

Both subsections contain mapping tables with the following headings:

- Infoway ID: Refers to the assertion sourced from Infoway's Privacy and Security Certification Requirements (2017 Edition Release 2) are available by request by contacting: certificationservices@infoway-inforoute.ca
- OntarioMD ID: Refers to the requirements sourced from OntarioMD's specifications available online at: https://www.ontariomd.ca/emr-certification/specifications-and-validation/specifications/current
    - OntarioMD requirement numbers starting with:
        - "HST…" are sourced from EMR Hosting 1.0 – Requirements. Published August 4, 2017.
        - "EMR.." are sourced from Primary Care EMR Baseline Requirements 5.0. Published August 4, 2017.
        - "ID.." are sourced from EMR Data Migration 5.0 – Data Dictionary. Published August 4, 2017.
        - "Covered by OntarioMD legal agreement" means that the Infoway assertion is addressed by one or more clauses in the OntarioMD Certified EMR Vendor Agreement.

- Finding: indicates if the mapping was found to be "equal" (i.e., the language used to describe the OntarioMD requirement and Infoway assertion are almost identical) or "equivalent" (i.e., the mapped requirement(s) or assertion(s) may use different language and possibly include additional concepts, but the business intent is met.). In some circumstances, several OntarioMD requirements need to be grouped together to be considered equal or equivalent to one Infoway assertion, and vice versa.

Infoway to OntarioMD Mapping

Summary:

- 52 Equivalent
- 15 Equal

Privacy and Security Certification Requirements		
Publication date: 2017 / Version: Release 2		
Infoway ID	OntarioMD ID	Finding
4 Privacy Officer	EMR20.01	Equivalent
5 Privacy Breach Process	HST07.02	Equivalent
9 Information Security Plan	HST08.10	Equivalent
10 Information Security Management Processes	HST01.01 HST02.33	Equivalent
11 Security Incident Management Process	HST07.01 HST07.03 HST07.04 HST07.18	Equivalent
13 Client Agreements	Covered by legal agreement with certified vendors	Equivalent
15 Independent Review of Information Security	HST08.01	Equivalent
17 Threat and Risk Assessment	HST08.01 HST08.02 HST08.08	Equivalent
18 Risk Management	HST08.07 HST08.10	Equivalent
19 Continuity of IT Services	HST09.03 HST09.04 HST09.05 HST09.06	Equivalent
20 Asset Inventory	HST02.01 HST02.02	Equal
21 Information Classification Policy	HST08.04	Equivalent
22 Vulnerability Assessment/Penetration Testing	HST02.34 HST02.35 HST02.36 HST02.38	Equivalent

Privacy and Security Certification Requirements		
Publication date: 2017 / Version: Release 2		
Infoway ID	**OntarioMD ID**	**Finding**
23 Privacy Information Notice	Covered by legal agreement with certified vendors	Equivalent
24 Limited Collection	EMR20.01	Equivalent
27 Limited Use and Disclosure	EMR20.01	Equivalent
31 Patient Access Mechanism	EMR07.13	Equal
35 No Marketing without Express Consent	Covered by legal agreement with certified vendors	Equivalent
38 User Registration Process	HST05.02	Equivalent
40 User Credentials	HST05.26 HST05.03 HST05.29 EMR14.01	Equivalent
41 User Credential Management	EMR14.01 HST05.30	Equivalent
43 Screen Time-Out	HST05.48	Equal
47 Role-based Access Control	HST05.05	Equivalent
48 Review of User Access Privileges	HST05.12	Equal
50 Secure Log-On	EMR14.01	Equivalent
51 Password Management	HST05.27	Equivalent
52 Unique Identification of Patients	ID#14	Equivalent
54 Display of Patient Identity on Printed Documents	EMR07.13	Equivalent
57 Merging of Duplicates	EMR01.06	Equal
58 Availability Engineering	HST09.03 HST01.11	Equivalent
59 Business Continuity Planning	HST09.01 HST09.10 HST09.11 HST09.12	Equivalent
61 Backup and Recovery	HST01.08 HST02.49 HST02.51	Equivalent
62 Backup and Recovery Mechanism	EMR15.04	Equal
64 End User Device Encryption	HST02.21	Equivalent
67 Protection of External Electronic Messaging	HST04.17	Equal
68 Protection of Access on Public Networks	HST02.11	Equivalent

Privacy and Security Certification Requirements		
Publication date: 2017 / Version: Release 2		
Infoway ID	OntarioMD ID	Finding
69 Secure Interchange	HST02.11 EMR14.12	Equivalent
70 Protection of Data at Rest	HST02.21 HST02.51 HST03.15 HST04.13 EMR14.12 EMR15.06	Equivalent
71 Audit Records	HST11.04 HST11.06	Equivalent
72 Audit Reports	EMR16.01	Equivalent
74 Logging of Administrative Activities	HST11.05	Equivalent
76 Monitoring Activity	HST11.18 HST11.21	Equivalent
77 Recording Disclosures	Covered by legal agreement with certified vendors	Equivalent
78 Audit Log Protections	HST11.09 HST11.10	Equal
79 History Retention	EMR16.01	Equivalent
80 Vulnerability Management	HST02.32 HST02.35 HST02.39 HST02.40	Equivalent
81 Patch Management	HST02.41 HST02.43	Equal
85 Confidentiality Agreements	HST05.03	Equivalent
88 Personnel Awareness of and Competence in Privacy and Security	HST05.03	Equivalent
89 Terms and Conditions of Employment	HST05.03	Equivalent
90 Privacy and Security Awareness and Training	HST05.03	Equivalent
91 Disciplinary Process	HST07.23	Equivalent
92 Change and Termination of Employment	HST05.13	Equivalent
93 Information Processing Facility Physical Security	HST03.03	Equivalent
94 Secure Area Physical Security	HST03.01	Equal

Privacy and Security Certification Requirements		
Publication date: 2017 / Version: Release 2		
Infoway ID	OntarioMD ID	Finding
95 Security of Offsite Equipment	HST02.20	Equal
96 Reuse or Disposal	HST04.15	Equal
97 Removal of Assets	HST03.19	Equivalent
100 Anti-Malware	HST02.32	Equivalent
101 Network Protection	HST02.11	Equivalent
102 Time Synchronization	HST11.08	Equal
103 Secure Management of Cryptographic Keys	HST10.09 HST10.16	Equivalent
106 Operations Documentation	HST02.03	Equal
108 Information Systems Change Control	HST02.47	Equivalent

Table 1 - Infoway to OntarioMD

OntarioMD to Infoway

Summary:

- 87 Equivalent
- 24 Equal

OntarioMD ID	Infoway ID	Finding
EMR Hosting 1.0 – Requirements Publication date: August 4, 2017 / Version & Status: 1.0 - Final		
HST01.02	11 Security Incident Management Process	Equivalent
HST01.03	11 Security Incident Management Process	Equivalent
HST01.07	59 Business Continuity Planning	Equivalent
HST01.08	61 Backup and Recovery	Equivalent
HST01.11	58 Availability Engineering	Equivalent
HST02.01	20 Asset Inventory	Equal
HST02.02	20 Asset Inventory 58 Availability Engineering	Equivalent
HST02.03	106 Operations Documentation	Equal
HST02.10	49 Protection of System Administrator Access	Equivalent
HST02.11	68 Protection of Access on Public Networks	Equivalent
HST02.21	95 Security of Offsite Equipment 64 End User Device Encryption	Equivalent
HST02.22	101 Network Protection	Equivalent
HST02.27	11 Security Incident Management Process	Equivalent
HST02.28	100 Anti-Malware	Equivalent
HST02.33	80 Vulnerability Management	Equivalent
HST02.34	80 Vulnerability Management	Equivalent
HST02.35	80 Vulnerability Management	Equivalent
HST02.36	22 Vulnerability assessment/Penetration testing	Equivalent
HST02.39	80 Vulnerability Management	Equivalent
HST02.40	80 Vulnerability Management	Equivalent
HST02.41	81 Patch Management	Equal
HST02.43	81 Patch Management	Equal
HST02.46	7 Information Security Policy and Plan Review 11 Security Incident Management Process 80 Vulnerability Management	Equivalent
HST02.47	107 Information Systems Development Policies	Equivalent
HST02.48	61 Backup and Recovery	Equivalent
HST02.51	61 Backup and Recovery	Equivalent
HST02.53	61 Backup and Recovery	Equivalent
HST02.54	61 Backup and Recovery	Equivalent
HST03.01	94 Secure Area Physical Security	Equal
HST03.03	94 Secure Area Physical Security	Equal
HST03.06	93 Information Processing Facility Physical Security	Equivalent
HST03.12	93 Information Processing Facility Physical Security	Equivalent
HST04.02	40 User Credentials	Equivalent

OntarioMD ID	Infoway ID	Finding
HST04.03	1 Privacy Policy	Equivalent
HST04.04	11 Security Incident Management Process	Equivalent
HST04.08	84 Acceptable Use Agreements	Equivalent
HST04.13	1 Privacy Policy 64 End User Device Encryption 65 Protection of PHI in Transit	Equivalent
HST04.15	96 Reuse or Disposal	Equal
HST04.16	6 Information Security Policy Document	Equivalent
HST04.17	67 Protection of External Electronic Messaging	Equal
HST04.19	51 Password Management	Equivalent
HST04.32	6 Information Security Policy Document	Equivalent
HST05.05	50 Secure log-on 38 User Registration Process	Equivalent
HST05.06	38 User Registration Process	Equivalent
HST05.12	48 Review of User Access Privileges	Equal
HST05.13	92 Change and Termination of Employment	Equivalent
HST05.14	45 Inactive Accounts	Equivalent
HST05.28	42 User Credential Control Process	Equivalent
HST05.29	41 User Credential Management	Equal
HST05.30	41 User Credential Management	Equal
HST05.35	84 Acceptable Use Agreements	Equal
HST05.48	43 Screen Time-Out	Equal
HST05.49	43 Screen Time-Out	Equal
HST06.01	20 Asset Inventory 21 Information Classification Policy	Equal
HST06.07	26 Data Retention/Disposal Process	Equal
HST07.01	11 Security Incident Management Process	Equivalent
HST07.02	11 Security Incident Management Process 5 Privacy Breach Process	Equivalent
HST07.03	11 Security Incident Management Process	Equivalent
HST07.04	90 Privacy and Security Awareness and Training 11 Security Incident Management Process	Equivalent
HST07.06	11 Security Incident Management Process	Equivalent
HST07.16	11 Security Incident Management Process	Equivalent
HST07.17	11 Security Incident Management Process	Equivalent
HST07.18	11 Security Incident Management Process	Equivalent
HST07.22	11 Security Incident Management Process	Equivalent
HST08.01	17 Threat and Risk Assessment	Equivalent
HST08.04	18 Risk Management 20 Asset Inventory	Equivalent
HST08.07	17 Threat and Risk Assessment	Equivalent
HST08.08	17 Threat and Risk Assessment	Equivalent
HST08.09	18 Risk Management	Equivalent
HST09.01	59 Business Continuity Planning	Equivalent
HST09.02	20 Asset Inventory	Equivalent

OntarioMD ID	Infoway ID	Finding
	59 Business Continuity Planning	
HST09.04	19 Continuity of IT Services	Equivalent
HST09.05	19 Continuity of IT Services 58 Availability Engineering	Equivalent
HST09.07	11 Security Incident Management Process 75 Logging of Faults	Equivalent
HST09.08	59 Business Continuity Planning	Equivalent
HST09.09	20 Asset Inventory 59 Business Continuity Planning	Equivalent
HST10.16	103 Secure Management of Cryptographic Keys	Equivalent
HST10.18	103 Secure Management of Cryptographic Keys	Equivalent
HST11.04	71 Audit Records 74 Logging of Administrative Activities	Equivalent
HST11.05	71 Audit Records 74 Logging of Administrative Activities	Equivalent
HST11.06	71 Audit Records	Equivalent
HST11.08	102 Time Synchronization	Equal
HST11.09	78 Audit Log Protections	Equal
HST11.18	76 Monitoring Activity	Equivalent
HST11.21	10 Information Security Management Processes 16 Review of Information Systems 17 Threat and Risk Assessment 18 Risk Management 76 Monitoring Activity	Equivalent
HST11.22	76 Monitoring Activity	Equivalent
HST12.02	82 Third-party Agreements 83 Third-party Relationship Management	Equivalent
HST12.04	82 Third-party Agreements 83 Third-party Relationship Management	Equivalent
HST12.06	17 Threat and Risk Assessment	Equivalent
HST12.08	59 Business Continuity Planning 61 Backup and Recovery 62 Backup and Recovery Mechanism	Equivalent
Primary Care EMR Baseline Requirements 5.0 Publication date: August 4, 2017 / Version & Status: 1.0 - Final		
EMR01.06	57 Merging of Duplicates	Equal
EMR07.13	31 Patient Access Mechanism	Equal
EMR14.01	40 User Credentials	Equivalent
EMR14.02	51 Password Management	Equivalent
EMR14.03	44 Account Lockout 51 Password Management	Equal
EMR14.05	47 Role-based Access Control	Equivalent
EMR14.06	47 Role-based Access Control	Equal
EMR14.07	47 Role-based Access Control	Equivalent
EMR14.08	47 Role-based Access Control	Equivalent

OntarioMD ID	Infoway ID	Finding
EMR14.09	47 Role-based Access Control	Equivalent
EMR14.12	40 User Credentials	Equivalent
EMR14.16	43 Screen Time-Out	Equivalent
EMR15.04	62 Backup and Recovery Mechanism	Equal
EMR16.01	71 Audit Records	Equivalent
EMR16.02	71 Audit Records 74 Logging of Administrative Activities	Equivalent
EMR16.04	71 Audit Records	Equivalent
EMR16.05	71 Audit Records 75 Logging of Faults	Equivalent
EMR16.06	71 Audit Records	Equivalent
EMR16.08	102 Time Synchronization	Equal
EMR21.01	17 Threat and Risk Assessment	Equivalent
EMR21.02	17 Threat and Risk Assessment	Equivalent

Table 2 - OntarioMD to Infoway