

[e-Approvals- 981-2026-287]

June 12, 2026

Dr. Catherine Zahn
Chair, Board of Directors
Ontario Health
525 University Avenue, 5th Floor
Toronto ON M5G 2L3

Dear Dr. Zahn,

Thank you for submitting your request to the Ministry of Health on January 14, 2026 under s. 55.10 of the *Personal Health Information Protection Act* (PHIPA). Your request was submitted to the Ontario Health Data Council (OHDC), in its capacity as the Advisory Committee under s. 55.11 of PHIPA, to review and make recommendations in accordance with s. 55.10 of PHIPA. Specifically, Ontario Health (OH) as a prescribed entity (PE) under s. 45 of PHIPA is requesting that the Minister direct the disclosure of certain personal health information (PHI) by means of the Electronic Health Record (EHR) for the purpose of analysis or compiling statistical information with respect to the management of, evaluation or monitoring of, the allocation of resources to or planning for all or part of the health system, including the delivery of services.

In this role as a PE, OH has identified an opportunity to improve the timeliness of cancer system performance monitoring, produce more complete evaluations of health services and treatment effectiveness, and enhance accuracy in current state assessments and projections used for health system planning, resource allocation, funding decisions, and policy development by using PHI by means of the EHR.

The OHDC has reviewed the request in its capacity as the Minister's Advisory Committee under s. 55.11 of PHIPA and is satisfied that the core components under s. 55.10 have been met, namely:

- The request has been submitted by a PE;
- The disclosure of the PHI would be in accordance with PHIPA, s. 45;
- Other information (e.g., de-identified data) would not serve the purposes of the disclosure; and
- The disclosure would not contain more PHI than is reasonably necessary to meet the intended purpose.

The OHDC further noted that this course of action supports a more modern, efficient approach to data governance and is well-aligned with the long-term recommendations of the OHDC to better use health data for the public good. The OHDC has thus recommended that I approve OH's request for me to direct the disclosure of the PHI set out in Appendix A (the "Relevant PHI") by the means of the EHR to OH's PE services.

I have considered OH's request as well as recommendations of the Advisory Committee and I have determined that:

- i. The requested PHI was submitted by OH in its capacity as a PE;
- ii. The requested PHI was provided by more than one health information custodian;
- iii. The disclosure of the Relevant PHI would be in accordance with s. 45 of PHIPA; and
- iv. The disclosure of the Relevant PHI would be in accordance with ss. 55.10(5) and (6) of PHIPA.

I am satisfied that no other information would serve the purpose of the disclosure and that the disclosure would not contain more PHI than is reasonably necessary to meet that purpose.

Accordingly, pursuant to my authority under s. 55.10 of PHIPA, for a period of two years from the date of this letter, I am directing the disclosure of the PHI set out in Appendix A by means of the EHR, by OH in its capacity as the prescribed organization, to OH as a PE in accordance with the conditions specified in Appendix A.

If OH, in its capacity as a PE, wishes for this direction to be extended beyond the initial two-year period, the request must be resubmitted to me on an annual basis for review and reconsideration, in consultation with the Advisory Committee, in accordance with s. 55.10.

Thank you for your ongoing work, and for your dedication and commitment to ensuring the availability of data and information needed for evidence-based health system decisions.

Sincerely,

A handwritten signature in black ink, appearing to read "M. Hillmer".

Michael Hillmer, PhD
Assistant Deputy Minister
Data and Analytics Strategy Division
Ministry of Health | Ministry of Long-Term Care

c: Matthew Anderson, President and Chief Executive Officer, Ontario Health
Deborah Richardson, Deputy Minister, Ministry of Health
Stephanie Lockert, Interim Executive Vice President and Chief Operating Officer,
Ontario Health
Nadia Remtulla, Chief Privacy Officer, Ontario Health
Neeta Sarta, Director, Digital Health Program Branch, Chief Digital Health Office,
Ministry of Health
Vivian Ng, (A) Director, Information Management Strategy and Policy Branch, Data
and Analytics Strategy Division, Ministry of Health

Appendix A

Ontario Health (OH), in its capacity as the prescribed organization (PO) under the *Personal Health Information Protection Act* (PHIPA), shall, in accordance with this Minister's direction, disclose the Relevant personal health information (PHI) as listed below to OH in its capacity as a prescribed entity (PE), for the purposes of analysis or compiling statistical information with respect to the management of, evaluation or monitoring of, the allocation of resources to or planning for all or part of the health system, including the delivery of services.

Relevant PHI

- i. Diagnostic Imaging Common Services (DICS)
 1. Health Card Number (HCN)
 2. Service Start Date
 3. Accession Number
 4. Document Status
 5. Document Relationship
 6. Imaging Procedure Code
 7. Source Imaging Procedure Code
 8. Anatomic Region
 9. Health Care Facility Code
 10. Organization ID
 11. Subject Document ID Imaging Date to Sequence Events and Link Reports for same Image
 12. Imaging Report

Conditions

OH, in its capacity as the PO, shall disclose the Relevant PHI listed above subject to the conditions in this letter and in accordance with the following additional conditions:

- a) Relevant PHI from the DICS shall be disclosed to OH as a PE using OH's shared, secure technology infrastructure that adheres to OH's set of information security standards, policies and practices.