

January 21, 2026

Re: Minister Direction under s. 55.10 of PHIPA for disclosure of personal health information from the Provincial Client Registry to Ontario Health's registry of chronic diseases

Dear Dr. Zahn,

Thank you for submitting your request to the Ministry of Health on November 4, 2025, under section 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 section 55.10 of PHIPA.

Ontario Health, as a prescribed person who compiles or maintains a registry of personal health information under section 39(1)(c) of PHIPA, is requesting that the Minister direct the disclosure of certain personal health information (PHI) from the provincial Electronic Health Records Provincial Client Registry for the purposes of facilitating or improving the provision of health care through the registry of cardiac and vascular services that is operated by Ontario Health.

As a prescribed person under PHIPA, Ontario Health helps to plan, coordinate, implement, and evaluate cardiovascular care, and is responsible for its registry of cardiac and vascular services. This registry is used by Ontario Health to maintain a provincial wait times system for cardiac care services, which is used by health care providers to facilitate timely, equitable, and appropriate patient access to cardiac services.

Since the Minister's direction dated January 22, 2025, Ontario Health has confirmed the effectiveness of its operations in respect of its registry of cardiac and vascular services by using certain data from the Provincial Client Registry in the provincial Electronic Health Record (EHR). Ontario Health has been able to access more complete and accurate data to support the management of waitlists for cardiac services, thereby supporting the delivery of more-efficient, higher-quality patient care.

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

- The request has been submitted by a prescribed person;
- The disclosure of PHI would be in accordance with PHIPA s. 39(1)(c);
- Other information (e.g., de-identified data) would not serve the purpose of the disclosure;
- 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 and 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 the Minister approve OH's request for the Minister to direct the continued disclosure of the PHI set out in Appendix A attached hereto (Relevant PHI) from the Provincial Client Registry in the EHR to OH's registry of cardiac and vascular services; and to review this request on an annual basis in consultation with the Advisory Committee in accordance with s. 55.10.

Pursuant to the delegation instrument dated April 15, 2025, the Minister of Health has delegated her authority under s. 55.10 to me. As such, I have considered OH's request as well as the recommendations of the Advisory Committee and have determined that: (i) the request was submitted by Ontario Health in its capacity as a prescribed person, (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 subsection 39(1)(c) of PHIPA; and (iv) in accordance with subsections 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 delegated authority under s. 55.10 of PHIPA, for a period of three years from the date of this letter, I am directing the disclosure of the Relevant PHI from the Provincial Client Registry in the EHR, by Ontario Health in its capacity as the prescribed organization, to Ontario Health's registry of cardiac and vascular services, in Ontario Health's capacity as a prescribed person, in accordance with the conditions specified in Appendix A attached hereto. This disclosure of the Relevant PHI is to be reviewed annually by the OHDC during the three-year period.

Further, as you know, on August 29, 2025, Ontario Regulation 329/04 (General) under PHIPA was amended to establish a new authority for Ontario Health to compile and maintain a registry of chronic diseases. The registry of chronic diseases will incorporate two existing registries currently managed by Ontario Health: the registry of cardiac and vascular services, and the Ontario Cancer Screening Registry into an expanded registry of chronic diseases. While the registry of cardiac and vascular services currently exists under Ontario Regulation 329/04, on October 31, 2026 this registry will be revoked and assumed within the registry of chronic diseases. As of October 31, 2026, the disclosure of the PHI set out in Appendix A attached hereto (Relevant PHI) by OH's prescribed organization from the Provincial Client Registry in the EHR may continue to OH's registry of chronic diseases.

If OH, in its capacity as a prescribed person, wishes for the Direction to be extended beyond this three-year period, the request must be resubmitted for review and reconsideration, in consultation with the Advisory Committee, in accordance with s. 55.10.

Thank you for your ongoing work on OH's registry of cardiac and vascular services.

Sincerely,

A handwritten signature in black ink, appearing to read "M. Hillmer", written in a cursive style.

Michael Hillmer
Assistant Deputy Minister
Data & Analytics Strategy Division
Ministry of Health

- c. Matthew Anderson, President and Chief Executive Officer, Ontario Health
 - Sylvia Jones, Deputy Premier and Minister of Health
 - Deborah Richardson, Deputy Minister, Ministry of Health
 - Dafna Carr, Chief Digital Health Officer, Chief Digital Health Office, Ministry of Health
 - Anna Greenberg, Executive Vice-President & Chief Operating Officer, Ontario Health
 - Stephanie Lockert, Chief, Strategy, Planning, Privacy and Analytics, Ontario Health
 - Nadia Remtulla, Chief Privacy Officer, Ontario Health
 - Neeta Sarta, Director, Digital Health Program Branch, Chief Digital Health Office, Ministry of Health
 - Christine Sham, Director, Information Management Strategy

APPENDIX A

Ontario Health (OH), in its capacity as the prescribed organization under PHIPA, shall, in accordance with this Minister's direction, disclose the Relevant PHI as listed below to OH in its capacity as a prescribed person, for the purposes of facilitating or improving the provision of health care through its registry of cardiac and vascular services.

Relevant PHI

i. Provincial Client Registry (PCR) Source:

1. PCR Enterprise Record Number

ii. Patient Demographics:

1. First Name
2. Last Name
3. Middle Name
4. Date of Birth
5. Date of Death
6. Death Indicator
7. Gender
8. Health Card Number (HCN)
9. HCN Issuing Authority
10. Medical Record Number(s) (MRN)
11. MRN Issuing Authority
12. Phone Type (Home)
13. Phone Number (Home)
14. Phone Type (Work)
15. Phone Number (Work)
16. Phone Type (Mobile)
17. Phone Number (Work)
18. Address Type (Home)
 - a. Street Address 1
 - b. Street Address 2
 - c. City
 - d. Country Code
 - e. Postal Code
 - f. Province
19. Address (Mailing)
 - a. Street Address 1
 - b. Street Address 2
 - c. City
 - d. Country Code
 - e. Postal Code
 - f. Province
20. Address Type (Temporary)
 - a. Street Address 1
 - b. Street Address 2
 - c. City
 - d. Country Code
 - e. Postal Code
 - f. Province

Conditions

OH, in its capacity as the prescribed organization, 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 PCR shall be disclosed to OH's registry of cardiac and vascular services using OH's shared, secure technology infrastructure that adheres to OH's set of information security standards, policies and practices.
- b) Relevant PHI from the PCR shall be disclosed to OH's registry of cardiac and vascular services as part of every patient/client search conducted by users of this registry.