

July 23, 2020

Mr. Evan Mills
Director, Digital Health Program Branch
Ministry of Health
Digital Health Division
1075 Bay Street, 12th Floor
Toronto ON M5S 2B1

RE: Digital health interoperability - proposed amendments to O. Reg. 329/04 and draft Digital Health Information Exchange Policy

Dear Mr. Mills,

Thank you for your continued leadership to support the health and safety of Ontarians during the COVID-19 pandemic.

The OCC commends the Government of Ontario for its efforts to develop a more integrated health data system through the interoperability of digital health tools, as recommended in our recent report, [*In Data We Trust: Unlocking the Value of Data in Ontario*](#).

Sharing health data more efficiently is essential to improving patient outcomes along the continuum of care, both during the pandemic and as we recover. Meanwhile, allowing researchers to access health data with robust privacy protections can lead to new insights, operational efficiencies, and innovation in health care delivery. It also generates new intellectual property, which contributes to the competitiveness of Ontario's health and life sciences sectors.

To ensure the proposed policy achieves its intended outcomes, we recommend the following:

- Clarify which entities may access health data and under which conditions. Specifically, we recommend allowing manufacturers to access to aggregate and/or anonymized patient-level data under certain circumstances (e.g. to address key research questions, to improve quality of care and research associated with quality care metrics, to verify data for innovative contracting agreements, etc.).
- Align review requirements with similar organizations such as the Institute for Clinical Evaluative Sciences (ICES) to ensure consistency.
- Align data interoperability with other provinces, where possible, to facilitate standardization across Canada and allow for compilation of pan-Canadian data.
- Ensure multi-stakeholder engagement throughout all phases of policy development and roll-out. This should include patient groups, industry, and health information custodians.

Thank you for the opportunity to provide input on this important policy development. We look forward to continued modernization of Ontario's health system.

Sincerely,



Rocco Rossi
President and CEO
Ontario Chamber of Commerce

CC:
The Honourable Christine Elliott, Minister of Health
Helen Angus, Deputy Minister of Health