

**POLICY:** Immunization – Management of School Class Lists

**Program Area:** Public Health-Healthy Living

**Section:** General

**Reference Number:** CLI.6210.PL.003

**Approved by:** Regional Lead – Community & Continuing Care

**Date:** Issued 2017/Nov/01  
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**PURPOSE:**

To ensure safe and secure transmission and management of personal health information contained in school class lists for the purpose of coordinating school-based immunization programs.

**BOARD POLICY REFERENCE:**

Executive Limitation (EL-2) Treatment of Clients  
Executive Limitation (EL-1) Treatment of Staff  
Executive Limitation (EL-7) Asset Protection and Risk Management

**POLICY:**

Public Health-Healthy Living requests the sharing of class lists from School Divisions/Schools in a manner that complies with The Personal Health Information Act (PHIA) and maintains safety and security of student information contained in class lists.

**DEFINITIONS:**

**School-Based Immunization Program:** Manitoba Health supports and funds specific immunization programs for targeted grades or birth cohorts that are offered solely through Public Health as per Recommended School Immunization Schedule eligibility criteria.

**IMPORTANT POINTS TO CONSIDER:**

Public Health Nurses offer the school-based immunization program every year in schools throughout Manitoba. In order to facilitate the timely implementation of this service, schools are asked to share with us detailed class lists for the specific grades dependent on the funded immunization programs for that year as determined by Manitoba Health.

Southern Health-Santé Sud is a trustee of personal health information and as a provider of health care is authorized under the Personal Health Information Act (PHIA) 13(1) (a) (b) to collect personal health information required for the provision of health care and may use that information for that purpose or a purpose closely related to the reason it was collected. Further,

section 14(2) (c.1) of PHIA permits the trustee to collect this information without whereby it may be disclosed to the trustee under section 22(2) of the Act.

PHIA 22(2) states that a trustee may disclose personal health information without the consent of the individual the information is about if the disclosure is:

- (h) to a computerized health information network established by a body specified in subsection (2.0), in which personal health information is recorded for the purpose of:
  - (i) providing health care;
  - (ii) facilitating the evaluation or monitoring of a program that relates to the provision of health or payment for health care, or;
  - (iii) facilitating research and planning that relates to the provision of health care or payment for health care.

The Freedom of Information and Protection of Privacy Act (FIPPA) 36(1) (b) and 37(1) (e) authorizes Southern Health- Santé Sud to collect personal information whereby: “the information relates directly to and is necessary for an existing service, program or activity of the public body: and the information may be disclosed to the public body under Division 3 of this Part;” A public body may disclose Personal Information: “44 (1) (f.1) to an officer or employee of a public body, for the purpose of delivering a common or integrated service, program or activity, if the information is necessary to deliver the service, program or activity and the officer or employee to whom the information is disclosed needs the information to carry out his or her responsibilities.

#### **PROCEDURE:**

1. On an annual basis, utilizing a standard letter template posted on Public Health-Healthy Living collaborative work site, School Divisions/Schools are asked to provide the class lists in electronic format (MS Excel) that will meet Public Health Information Management System (PHIMS) specifications. As per direction from Manitoba Health, the schools are permitted to share the class lists for those students that will be part of the school immunization program and should include the PHIN of each student (but not the family Manitoba Health Services registration number).
2. Transmission of class lists containing personal health information is protected through the use of encryption and password protected email or digitally approved encrypted vaulted USB for courier delivery or pick-up at the School Division or School Office.
3. The password for the encrypted document is communicated separately by phone rather than send it via email. If sent by email or fax it is not to be included with the file transmission.
4. Once data is entered into PHIMS for the purpose of mass immunization event planning, the personal health information received in electronic format is deleted from flash drives or RHA network hard drives.

#### **REFERENCES:**

Personal Health Information Act (PHIA)

[ORG.1411.PL.404](#) Security and Storage of Confidential Information Including Transportation

[ORG.1411.SG.001](#) Emailing Confidential Information