

	Scenario	IMA		ISA
		Vendor	Generic	
1	Using a billing agent, external transcription service.	X		
2	Using a storage firm for electronic or paper records.	X		
3	Using an application service provider (ASP), remote data storage.	X		
4	Sharing patient information between clinic sites.			X
5	Sharing information within the Primary Care Network (PCN), large clinic group setting for the purpose of patient care.			X
6	Individual clinics providing identifiable health information to PCN for purposes including quality improvement, performance metrics, and guiding PCN direction. Exceptions: <ol style="list-style-type: none"> 1. In the case of a centralized PCN, or a PCN with a small number of member clinics where the PCN is an affiliate acting under the clear documented direction of each custodian with respect to the ongoing use of the data, no IMA is required. 2. Individual clinics exchanging identifiable patient information within the clinic for these purposes do not require an IMA. 		X	
7	Providing health information to the Health Quality Council of Alberta.		X	
8	Pan PCN committee hires/contracts research analyst and provides clinic data collected by PCN.		X	
9	Centralized PCN staff collecting, coding and manipulating patient level data from all clinics.(non-health care related purposes)		X	
10	Completely non identifiable data at patient or clinic level is shared with third parties – member clinics, public, etc. for information purposes (non-health care related)	No agreement required		
11	Data identifiable at the clinic level is shared with third parties – member clinics, public, etc. for information purposes (non-health care related)		X	
12	Patient level identifiable data is exchanged with AHS. (Sharing identifiable data with other custodians for secondary purposes)		X	
13	Completely non identifiable data is exchanged with AHS.	No agreement required		
14	Disclosure to Minister or Department	No agreement required (HIA 46(1))		
15	Custodian is disclosing patient information to another custodian outside of his/her clinic for the purpose of continuity of care.	No agreement required		
16	Custodians sharing patient records within a clinic.			X