

4. 2017 YEAR-END MFIPPA REPORT

RAPPORT DE FIN D'ANNÉE SUR L'APPLICATION DE LA LAIMPVP 2017

COMMITTEE RECOMMENDATION

That Council receive this report for information.

RECOMMANDATION DU COMITÉ

Que le Conseil municipal prenne connaissance de ce rapport.

DOCUMENTATION/DOCUMENTATION

1. City Clerk's report, Office of the City Clerk and Solicitor, dated 27 March 2018 (ACS2018-CCS-GEN-0001).

Rapport du Greffier municipal, Bureau du greffier municipal et de l'avocat général, daté le 27 mars 2018 (ACS2018-CCS-GEN-0001).

**Report to
Rapport au:**

**Finance and Economic Development Committee
Comité des finances et du développement économique
3 April 2018 / 3 avril 2018**

**and Council
et au Conseil
11 April 2018 / 11 avril 2018**

**Submitted on March 27, 2018
Soumis le 27 mars 2018**

**Submitted by
Soumis par:
M. Rick O'Connor, City Clerk and Solicitor / Greffier de la Ville et chef du
contentieux**

**Contact Person
Personne ressource:
Kiel Anderson, Manager, Policy and Technical Solutions / gestionnaire, Politiques
et Solutions technologiques
613-580-2424 ext. 13430, Kiel.Anderson@ottawa.ca**

Ward: CITY WIDE / À L'ÉCHELLE DE LA VILLE File Number: ACS2018-CCS-GEN-0001

SUBJECT: 2017 Year-End MFIPPA Report

OBJET: Rapport de fin d'année sur l'application de la LAIMPVP 2017

REPORT RECOMMENDATIONS

**That the Finance and Economic Development Committee recommend Council
receive this report for information.**

RECOMMANDATIONS DU RAPPORT

Que le Comité des finances et du développement économique recommande que le Conseil municipal prenne connaissance de ce rapport.

BACKGROUND

The changing technological landscape has contributed to an evolving understanding of privacy and records of both public institutions as well as private corporations. As the amount of information in the custody or under the control of “institutions” such as the City of Ottawa grows, people expect increased access to government records of decision-making, while at the same time trusting that privacy and confidential information will be protected. Therefore, the City and other institutions must ensure that records are preserved and maintained appropriately, that privacy is protected and that the public is provided access to information in accordance with the principles and purposes set out in the *Municipal Freedom of Information and Protection of Privacy Act* (MFIPPA). In other words, information should be made available to the public, with only limited and specific exemptions from the right of access.

MFIPPA applies to all local government “institutions” in Ontario, including municipalities, police service boards, public library boards, conservation authorities and boards of health as well as other “local boards”. The purpose of the legislation is to provide a balance between the right of access to information held by institutions, with the requirement to protect the privacy of individuals with respect to “personal information”. As such, MFIPPA sets out rules and regulations by which municipal institutions must abide in order to protect the privacy of an individual’s personal information in government records. This includes rules regarding the collection, use, disclosure and disposal of personal information in the custody and control of a municipal institution. As outlined above, these obligations are balanced with the right to access municipal government information, including most general records and records containing an individual’s personal information, subject to very specific and limited exemptions.

As an “institution” defined under MFIPPA, the City may appoint a “Head” of the institution who is responsible for overseeing the administration of and for decisions made under the statute. At the City of Ottawa, Council has, by by-law, designated the Mayor as the Head of Institution for these purposes. In turn, the Mayor has provided

his written delegation to the City Clerk and Solicitor to address all matters with respect to this *Act*.

In keeping with the general principles outlined in the City's Accountability and Transparency Policy that "every new delegation of power will have a corresponding accountability mechanism," the purpose of this report is to outline the operations and responsive metrics of the Access to Information and Privacy (ATIP) Office in the Office of the City Clerk and Solicitor.

City Council has made transparency and open government a priority, approving several related measures such as monthly public disclosure of individual office expenses for Members of Council and the Senior Leadership Team, an online Lobbyist Registry and a Gifts and Ticket Registry as well as Open Data initiatives. On July 17, 2013, Council approved a Routine Disclosure and Active Dissemination Policy that identifies a requirement for City departments to develop plans for routinely releasing or automatically making available certain records to the public. As such, the City of Ottawa is considered a leader in this field.

In 2017, the ATIP Office completed a total of 766 requests under MFIPPA for general records and personal information. In addition to the responsibilities under MFIPPA, the City Clerk and Solicitor also administers access requests related to the *Personal Health Information Protection Act, 2004* (PHIPA), which establishes rules for the collection, use and disclosure of personal health information for Health Information Custodians (e.g. Public Health, Paramedic Services, etc.) operating within the Province of Ontario. In 2017, the ATIP Office completed nine requests for personal health information under PHIPA.

Overall, the ATIP Office completed 775 access to information requests in 2017.

A summary of statistics is provided in Document 1, based on data included in the City of Ottawa's 2017 annual statistical report to the Information and Privacy Commissioner of Ontario (IPC), which was submitted on February 26, 2018, in accordance with statutory provisions.

DISCUSSION

Access to Information and Privacy Office Initiatives

Following the Organizational Alignment of October 5, 2016, the Access to Information and Privacy (ATIP) Office was positioned under the Manager, Policy and Technical Solutions Branch within the Office of the City Clerk and Solicitor

In 2017, an ATIP resource was established within the Business Support Services (BSS) branches of each department in order to reiterate the importance of ATIP's legislative function within the City. As described in the 2016 Year-End MFIPPA Report, the position in each BSS branch serves as the designated liaison and direct link between each department and the ATIP Office. The resource is accountable for tracking ATIP requests within the department and providing information such as search time and estimated number of pages. In addition, the BSS ATIP resource works with departmental service area experts to fulfill access requests and ensure departmental staff are aware of, and adhere to, the legislative obligations and timelines set out by MFIPPA, in consultation with the ATIP Analysts.

Further, the resource works in conjunction with the ATIP Office and the Policy Unit within the Policy and Technical Solutions Branch to develop and revise departmental plans for routine and proactive disclosure, as described below.

Routine Disclosure and Active Dissemination Policy

Routine Disclosure is the regular or automatic release of certain types of administrative and operational records in response to requests made informally and outside of the MFIPPA process. Active Dissemination is the periodic release of general records prior to, or in the absence of, a formal or informal request, and is usually applied to general records or statistics.

On July 17, 2013, Council approved the report titled, "Routine Disclosure and Active Dissemination Policy", which requires every City department to develop plans for routinely releasing or automatically making available certain records to the public. These plans, which are called Routine Disclosure and Active Dissemination (RD/AD) Plans, let the public know which information can be released without filing a formal request for information with the ATIP Office. RD/AD Plans also help City staff better understand the types of information that can be routinely disclosed to the public and staff's obligation to disclose such information, as well as the types of information that require formal access procedures and must be referred to the ATIP Office.

Following approval of this Policy, departmental plans were established for Building Code Services, Transit Services, Supply Services and Parks, Recreation and Cultural Services. In addition, ATIP staff worked with the Ottawa Paramedic Service to manage all requests for PHIPA information directly through its website. A new routine disclosure practice was established for the Community and Social Services Department, and is primarily attributed to a decrease in the number of requests for individuals seeking their personal information.

As noted in previous year-end reports, identifying records for routine disclosure and authorizing staff to make them available is a labour intensive and time-consuming process. In addition, the October 2016 Organizational Alignment, which saw several departments merge and branches restructured and repointed, means that existing departmental RD/AD Plans need to be reviewed and refreshed to reflect these new departmental structures.

In 2017, a direct page for the ATIP Office, Ottawa.ca/mfippa, was created. This page includes an overview of the access to information and privacy process as well as the proactive disclosure of past MFIPPA requests. In addition, the site includes the publication of refreshed departmental RD/AD Plans, which creates a convenient, accessible directory that allows members of the public to identify and obtain information directly from departments. Enhanced departmental RD/AD Plans will be developed and posted to the site throughout 2018.

Training and Awareness

The ATIP Office regularly offers MFIPPA training in order to raise awareness and reduce the risk of privacy breaches, as such incidents tend to result from human error due to a lack of guidance and knowledge about privacy and security. In 2017, eight training sessions were conducted for approximately 150 employees. In addition, an “Intro to ATIP” on-line training module was provided to managers across the corporation. The ATIP Office also provided advice on access and privacy implications for several departmental policies, procedures and services, including the development of the OC Transpo EquiPass form, release of personal information to police services, the Canadian Revenue Agency and the Ombudsman, cloud computing, and assistance reviewing and drafting collection notification statements.

In March 2017, to promote the City's annual Privacy Awareness Week, which raises awareness of ATIP and MFIPPA, the City Clerk and Solicitor published an article through "In the Loop," the City-wide employee e-newsletter, along with a corporate-wide e-mail message.

2017 ATIP Statistical Summary

A summary of statistics is provided in Document 1, based on data included in the City of Ottawa's 2017 annual statistical report to the Information and Privacy Commissioner of Ontario (IPC) that was submitted on February 26, 2018, in accordance with statutory provisions.

RURAL IMPLICATIONS

There are no rural implications associated with this report.

CONSULTATION

This is an internal information report and did not require public consultation.

COMMENTS BY THE WARD COUNCILLOR(S)

This is a city-wide report.

LEGAL IMPLICATIONS

There are no legal impediments to Committee and Council receiving this report for information. In accordance with Section 26 of the *Municipal Freedom of Information and Protection of Privacy Act* (MFIPPA), the Head of the Institution is mandated to provide an annual report to the Information and Privacy Commissioner of Ontario. In short, the annual report shall include a number of metrics, including the number of requests and refusals under the MFIPPA and the *Person Health Information Protection Act, 2004* (PHIPA); the amount of fees collected under Section 45 of the MFIPPA or under Section 54 of the PHIPA; and the number of cases for which personal information was disclosed.

RISK MANAGEMENT IMPLICATIONS

There are no risk management implications associated with this report.

FINANCIAL IMPLICATIONS

There are no financial implications associated with this report.

ACCESSIBILITY IMPACTS

There are no accessibility impacts associated with this report.

TERM OF COUNCIL PRIORITIES

There are no Term of Council priorities associated with this report.

SUPPORTING DOCUMENTATION

Document 1 – 2017 MFIPPA Statistical Summary

DISPOSITION

The City Clerk and Solicitor and the ATIP Office will implement any decisions made by Council in relation to this report.

Document 1 – 2017 MFIPPA Statistical Summary

Under the *Municipal Freedom of Information and Protection of Privacy Act* (MFIPPA), the “Head” of the institution is responsible for overseeing the administration of and for decisions made under the statute. At the City of Ottawa, Council has, by by-law, designated the Mayor as the Head of Institution for these purposes. In turn, the Mayor has provided his written delegation to the City Clerk and Solicitor to address all matters with respect to this *Act*. In addition to the responsibilities under MFIPPA, the City Clerk and Solicitor also administers access requests related to the *Personal Health Information Protection Act, 2004* (PHIPA). This legislation establishes rules for the collection, use and disclosure of personal health information for Health Information Custodians within the Province of Ontario.

Under Subsection 26(1) of MFIPPA, the Head of the Institution is required to submit an annual report to the Information and Privacy Commissioner of Ontario (IPC) that provides statistics related to requests for access to information. This document provides a summary of statistics included in the City of Ottawa’s 2017 annual report to the IPC, which was submitted on February 26, 2018. Data from 2016 and 2015 is also provided for comparative purposes.

As noted in previous year-end reports to Committee and Council, requests for access to general and personal information are received and processed pursuant to Part I of MFIPPA. Similarly, access to an individual’s own personal health information under the custody and control of one of the City’s Health Information Custodians (e.g. Public Health, Paramedic Services, etc.) is prescribed under Part V of PHIPA.

By way of background, there are two types of information requests captured in statistics pertaining to MFIPPA, as follows:

- “**General Records**”: Requester is asking for general information or information that includes personal information about someone else; and
- “**Personal Information**”: Requester or an authorized representative is asking for information about himself or herself (this document refers to such information as “own personal information”).

In addition, this document includes statistics related to requests for “**Personal Health Information**” under PHIPA.

MFIPPA provides the Head of the Institution the discretion to charge fees for processes related to access requests. Fee charges for MFIPPA requests are prescribed by Section 45 of MFIPPA and Section 6 of Regulation 823 made under the *Act*. A requester is required to pay an initial, mandatory application fee of \$5, with the possibility of additional fees depending on the nature of the request. For a Personal Information request, an additional fee will be assessed for photocopies if the cost of the copies requested exceeds \$5. For General Records requests, additional fees may be charged for Search Time, Record Preparation and Photocopying. In 2017, the ATIP Office recovered \$7,900. In keeping with the spirit of the *Act* to make records accessible to the public and the Information and Privacy Commissioner of Ontario's direction that "fees should never be used as a deterrent or barrier to access," the ATIP Office does not charge fees for requests that take under four hours to process, where under 50 pages of records will be provided, or in other circumstances where a fee waiver may be considered appropriate.

All Requests – MFIPPA

Table 1 – Number of new requests received (General Records and Personal Information)

Request Type	2017	2016	2015
General Records	756	784	721
Personal Information	56	44	86
Total	812	828	807

Number of Requests Completed

Each year, staff receives and completes new requests for general records while also completing requests that have been carried forward from the previous year. Requests are carried forward from a previous year for a variety of reasons, most often because the requests were received and entered in December and therefore have automatic legislative deadlines in the following year (i.e. January). However, this may also be due to matters such as the size and scope of a request, and consultations with internal staff and/or third parties. As a result, in any given year there may be a difference in the number of new requests received and the number of requests completed.

In 2017, the ATIP Office completed 766 requests made under MFIPPA, comprised of 715 requests for access to general records and 51 requests for access to own personal information. In addition, there were nine requests completed for access to own personal health information under PHIPA.

Table 2 – Number of requests completed

Request Type	2017	2016	2015
General Records (under MFIPPA)	715	773	774
Personal Information (under MFIPPA)	51	46	91
Sub-total (records requested under MFIPPA)	766	819	865
Personal Health Information (under PHIPA)	9	8	9
Total	775	827	874

Source of Requests

Requests made under MFIPPA for general records and personal information are received from a variety of sources, as indicated in the following table.

Table 3 – Source of requests – Overall (General Records and Personal Information)

Requester	2017	2016	2015
Individual/Public	396	366	426
Individual by Agent	13	0	0
Business	81	133	107
Academic/Researcher	2	0	1
Association/Group	22	7	8
Media	85	139	90
Government (All Levels)	31	26	20
Other (Lawyers)	136	148	213

Total Requests	766	819	865
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Time to Completion

The time required to complete requests can vary due to factors such as the complexity of a request, consultations that may be required and department retrieval times. The following table provides data with respect to the absolute amount of time that was required to complete requests made under MFIPPA, regardless of compliance with timelines set out in the legislation.

Table 4 – Time to completion – Overall (General Records and Personal Information)

Time to Complete	2017	2016	2015
30 days or less	509	657	678
31-60 days	174	108	121
61-90 days	45	29	39
91 days or over	38	25	27
Total	766	819	865

In addition to the factors set out above, the time it takes to complete requests can be particularly affected by staffing changes. This is due to the nature of the work required to review requests for information, apply specific legislative provisions, and correspond with departments and requesters.

Each Analyst within the ATIP Office works on multiple files at any given time. Should an Analyst leave the office, these files must be redistributed within the Office and resumed by another Analyst. This new Analyst must become familiar with the files, the parties involved and any outstanding issues or considerations relating to the request. Furthermore, any new employee hired to fill a vacancy requires extensive training with respect to the relevant legislation and its application within the context of the City of Ottawa. These staffing matters can affect completion times and compliance with the statutory timelines set out in MFIPPA.

In 2017, the ATIP Office experienced various organizational structure impacts that affected its operational performance. Retirement, leave and staff accepting temporary assignments in other areas of the corporation left the Office understaffed for periods of time during the year, and required the hiring and training of new employees. However, the Office stabilized towards the end of 2017.

Compliance with MFIPPA

MFIPPA provides timelines for the completion of requests made under the statute. There is a statutory timeframe of 30 days for completion of an access request (i.e. giving written notice to a requester regarding whether access to all or part of the record will be provided, and providing access if so), unless an exemption is applied under Subsection 20(1) and/or 21(1) of the legislation, as follows:

- Under Subsection 20(1) of MFIPPA, the Head of the Institution may extend the 30-day time limit (i.e. issue a “Notice of Extension”), “for a period of time that is reasonable in the circumstances, if,
 - a) the request is for a large number of records or necessitates a search through a large number of records and meeting the time limit would unreasonably interfere with the operations of the institution; or
 - b) consultations with a person outside the institution are necessary to comply with the request and cannot reasonably be completed within the time limit.”
- Under Subsection 21(1), the Head of the Institution must give written notice to the person to whom the information relates (i.e. a “Notice to Affected Person”) before granting a request for access to a record,
 - a) that the head has reason to believe might contain information referred to in subsection 10 (1) [a record that reveals a trade secret or scientific, technical, commercial, financial or labour relations information, supplied in confidence implicitly or explicitly] that affects the interest of a person other than the person requesting information; or
 - b) that is personal information that the head has reason to believe might constitute an unjustified invasion of personal privacy”

The written notice described above triggers extensions on the time period in which the request must be completed.

In 2017, 572 requests were completed within the statutory timeframe or time limits permitted under a Notice of Extension and/or a Notice to Affected Person, as indicated in the following table. It is important to note that a number of requests were completed within days of the 30-day statutory timeframe expiring, but a Notice of Extension was not issued because the request was often substantially complete near the end of the 30-day timeframe. In addition, the statutory 30-day timeline set out under MFIPPA includes weekends and statutory holidays.

Table 5 – Compliance with MFIPPA – Overall (General Records and Personal Information)

Requests Completed	2017	2016	2015
Number of requests completed within the 30-day statutory timeframe or time limits permitted under a Notice of Extension and/or a Notice to Affected Person	572	708	696
Number of requests completed in excess of the 30-day statutory timeframe or time limits permitted under a Notice of Extension and/or a Notice to Affected Person	194	111	169
Total	766	819	865

Disposition of Requests

MFIPPA provides for a Head to withhold some or all of a requested record by applying various exemptions based on the type of information contained within the record, as detailed in Sections 6 to 16 of the legislation. For example, information related to law enforcement, advice or recommendations, and economic and other interests may be exempt in particular situations. In 2017, the most common exemption applied with respect to general records was made under personal privacy provisions of Section 14 of MFIPPA. The following tables provide statistics related to the disposition of requests made under MFIPPA.

Table 6 – Disposition of requests – Overall (General Records and Personal Information)

Disposition	2017	2016	2015
All information disclosed	203	249	225
Information disclosed in part	297	391	400
No information disclosed	34	85	123
No responsive records exist	89	0	0
Request withdrawn, abandoned or non-jurisdictional	143	94	117
Total	766	819	865

The increased number of “no responsive records exist” in 2017 is the result of how the internal access to information reporting software. In 2016 and 2015, the reporting software was incorrectly categorizing files as “no information disclosed” rather than “no responsive records exist”. The “no information disclosed” disposition is for instances where records exist, but access is denied due to exemptions set out under the *Act*. The “no responsive records exist” disposition reflects instances where the requester was seeking records that do not exist. Staff corrected this anomaly in 2017.

Table 7 – Exemptions and Exclusions Applied – Overall (General Records and Personal Information)

Exemptions and Exclusions Applied	2017	2016	2015
Section 6 – Draft By-laws, etc.	1	1	0
Section 7 – Advice or Recommendations	28	30	20
Section 8 – Law Enforcement	57	64	80
Section 8(3) – Refusal to Confirm or Deny	0	0	0
Section 8.1 – <i>Civil Remedies Act, 2001</i>	0	0	0
Section 8.2 – Prohibiting Profiting from Recounting Crimes Act, 2002	0	0	0

Section 9 – Relations with Governments	1	0	0
Section 10 – Third Party Information	12	12	7
Section 11 – Economic/Other Interests	11	22	29
Section 12 – Solicitor-Client Privilege	17	29	17
Section 13 – Danger to Safety or Health	2	1	2
Section 14 – Personal Privacy (Third Party)	249	364	325
Section 14(5) – Refusal to Confirm or Deny	7	4	2
Section 15 – Information Soon to be Published	13	9	8
Section 20.1 – Frivolous or Vexatious	1	0	0
Section 38 – Personal Information (Requester)	0	1	3
Section 52(2) – Act Does Not Apply	0	0	0
Section 53(3) – Labour Relations and Employment Related Records	7	14	17
Section 53 – Other Acts	0	3	0
PHIPA Section 8(1) Applies	0	0	0
Total	406	554	510

The sections below provide additional details for each category of request under MFIPPA (general records and personal information) and PHIPA (personal health information).

General Records Request – MFIPPA

The ATIP Office completed 715 requests for general records in 2017, which follows the 2015 and 2016 trend of more than 700 requests per year.

The following table provides a summary of the absolute time to completion for general records, regardless of compliance with timelines set out in the legislation.

Table 8 – Time to completion – General Records

Time to Complete	2017	2016	2015
30 days or less	482	616	609
31-60 days	160	104	102
61-90 days	39	28	36
91 days or over	34	25	27
Total	715	773	774

With respect to compliance related to general records requests during the 2017 reporting year, 514 requests were completed within the initial 30-day statutory timeframe or within the time limits permitted under a Notice of Extension and/or a Notice to Affected Person.

It is important to note that a number of requests were completed within days of the 30-day statutory timeframe expiring, but a Notice of Extension was not issued because the request was substantially complete near the end of the 30-day timeframe. In addition, the statutory 30-day timeline set out under MFIPPA includes weekends and statutory holidays.

With respect to the 201 requests completed in excess of statutory time limits in 2017, some of these requests involved late retrievals from departments or complex files that crossed multiple departments and included large amounts of materials. Other requests required clarifications from the requester or secondary searches to locate additional records. In other cases, requesters agreed to go beyond the legislated deadline without a formal extension when working with the ATIP Office, or files were abandoned by requesters and extended beyond time limits before being formally closed. These situations are not reflected in the statistics provided to the IPC.

In addition to the factors set out above, the time it takes to complete requests can be particularly affected by staffing changes. This is due to the nature of the work required to review requests for information, apply specific legislative provisions, and correspond with departments and requesters.

Each Analyst within the ATIP Office works on multiple files at any given time. Should an Analyst leave the office, these files must be redistributed within the Office and resumed by another Analyst. This new Analyst must become familiar with the files, the parties involved and any outstanding issues or considerations relating to the request. Furthermore, any new employee hired to fill a vacancy requires extensive training with respect to the relevant legislation and its application within the context of the City of Ottawa. These staffing matters can affect completion times and compliance with the statutory timelines set out in MFIPPA.

In 2017, the ATIP Office experienced various organizational structure impacts that affected its operational performance. Retirement, leave and staff accepting temporary assignments in other areas of the corporation left the Office understaffed for periods of time during the year, and required the hiring and training of new employees. However, the Office stabilized towards the end of 2017.

The following table shows compliance with MFIPPA timelines for general records requests.

Table 9 – Compliance with MFIPPA – General Records

Requests Completed	2017	2016	2015
Number of requests completed within the statutory timeframe or time limits permitted under a Notice of Extension and/or a Notice to Affected Person	514	666	625
Number of requests completed in excess of the statutory timeframe or time limits permitted under a Notice of Extension and/or a Notice to Affected Person	201	107	149
Total	715	773	774

Personal Information Requests – MFIPPA

Personal information is defined in the statute as recorded information about an identifiable individual including, among other things, information related to race,

national or ethnic origin, colour, religion, age, sex, sexual orientation, marital or family status, as well as education, medical, criminal or employment history of an individual. Personal information files tend to be very voluminous and can range from hundreds to thousands of pages. The ATIP Office has been working with City departments to encourage the direct and automatic release of own personal information to individuals without the need for a formal access request.

Table 10 – Time to completion – Personal Information Records

Time to Complete	2017	2016	2015
30 days or less	27	41	69
31-60 days	14	4	19
61-90 days	6	1	3
91 days or over	4	0	0
Total	51	46	91

With respect to compliance with timelines set out in MFIPPA, 28 requests for personal information were completed within the initial 30-day timeframe or time limits permitted under a Notice of Extension and/or a Notice to Affected Person.

Table 11 – Compliance with MFIPPA – Personal Information Requests

Requests Completed	2017	2016	2015
Number of requests completed within the statutory timeframe or time limits permitted under a Notice of Extension and/or a Notice to Affected Person	28	42	71
Number of requests completed in excess of the statutory timeframe or time limits permitted under a Notice of Extension and/or a Notice to Affected Person	23	4	20
Total	51	46	91

Personal Health Information Requests under *the Personal Health Information Protection Act, 2004*

There were nine requests for information under PHIPA completed in 2017, which is consistent with 2016 and 2015.

With respect to compliance, eight of nine requests were completed within the statutory limit (30 days) and/or the limit permitted under a time extension and notice under Subsections 54(3) and 54(4) of PHIPA. The Act provides for an extension of up to 30 days if meeting the initial 30-day timeline would unreasonably interfere with the operations of the Health Information Custodian because the information consists of numerous pieces of information, locating the information would require a lengthy search, or if additional time is required to undertake necessary consultations.

Table 12 – PHIPA Requests

PHIPA Requests	2017	2016	2015
Number of requests completed within the statutory limit or the time limit permitted under a Time Extension Notice	8	8	7
Number of requests completed in excess of the statutory limit or the time limit permitted under a Time Extension Notice	1	0	2
Total	9	8	9