helpmehear.ca

Position Statement

October 2026

Client Access to Records and Transfer of Client Records

Association of Hearing Instrument Practitioners of Ontario (AHIP)

1. Statement of Purposes

This advisory provides guidance to AHIP members regarding responding to client's requests for access to records regarding their hearing healthcare, and regarding the transfer of copies of client's records regarding their hearing healthcare by an AHIP member to another hearing healthcare provider at a client's request.

When a client requests that copies of records regarding their hearing healthcare be transferred to another hearing healthcare provider, the goal should be to support continuity of care by providing the receiving hearing healthcare provider with the relevant information needed to understand the client's hearing healthcare, including, for example, relevant hearing history, relevant previous services, and current hearing needs.

2. Context and Resources

This Position Statement is not legal advice; each AHIP members should consider seeking appropriate professional advice regarding the matters addressed in this document, including without limitation their compliance with privacy legislation applicable in the circumstances, which may include (without limitation) the *Personal Health Information Protection Act, 2004* (PHIPA).

Useful information regarding client access to records and transfer of client records can also be obtained by reviewing the website of the Information and Privacy Commissioner of Ontario (e.g., Resources | Information and Privacy Commissioner of Ontario).

3. Client Access to Records

Although a clinic may own the physical or electronic record system, the information about a specific client and their hearing healthcare contained within such system is the client's personal health information.

Under PHIPA, clients have a right to access their personal health information, subject to limited exceptions.

When a client provides authorization for copies of records regarding hearing healthcare to be transferred to another hearing healthcare provider, the transferring clinic should provide only copies of the information which the client has requested be transferred.

4. How Should a Client Request Their Records?

A client may request access to their personal health information directly from their hearing healthcare provider.

Requests should be made in writing and should clearly identify:

- The client's name and contact information; the client's identity should be verified before records are released or transferred (as the case may be)

- The information being requested (for example, hearing aid history, audiograms, specific documentation, or the client's complete record regarding their hearing healthcare)
- The name and contact information of the provider or clinic receiving the records, if the information is being transferred directly (at the client's request)
- The client's signature, or other verification of authorization, where required

Clinics may use their own record request or authorization forms to confirm the client's consent and ensure the information is disclosed appropriately.

5. What Should Be Included in a Client Record Transfer?

When a client provides authorization for copies of records regarding hearing healthcare to be transferred to another hearing healthcare provider, the transferring clinic should provide only copies of the information which the client has requested be transferred.

If a client requests the transferring clinic to transfer copies of the client's complete file to another hearing healthcare provider, it is important to note that:

(i) given the goal of supporting continuity of care by providing the receiving hearing healthcare provider with the relevant information needed to understand the client's hearing healthcare, including, for example, relevant hearing history, relevant previous services, and current hearing needs, consideration may be given to the number of years of information proposed to be provided (such as for example 3-5 years of information), provided that the client must be consulted regarding whether there is a need for more information being transferred; and

(ii) there is no single checklist under PHIPA identifying the documents that must be transferred. In such an instance, a member should provide the copies of the requesting client's personal health information relevant to their hearing healthcare which is contained within the record regarding that client.

Types of information which may be in a client's record regarding their hearing healthcare are listed in Appendix "A" to this Policy Statement.

6. How should a Client Record Transfer be Conducted?

If a client requests access to their personal health information directly from their hearing healthcare provider, the provided should respond to the request within thirty (30) days.

Transfers of copies of relevant portions of a client's records regarding their hearing healthcare should be done in a safe and secure manner (which, for example, may involve password protection where appropriate). Additionally, the transferring clinic should retain the records of which it has transferred copies (all in accordance with records retention requirements and/or practices).

If the transferring clinic plans to charge fees regarding a review of records prior to transfer, those fees must be reasonable and reflect the nature and reason for the review. If the transferring clinic plans to charge fees regarding copying and/or transferring records, those fees must be reasonable. The client should be notified in advance if any fees are to be charged.

Appendix "A"

List of Types of Information which may be in a Client's Record regarding their Hearing Healthcare

Clinical Information, where available:

- Case history information
- Audiograms and hearing assessments
- Test results, including:
    - Pure tone testing
    - Speech testing
    - Tympanometry or other diagnostic measures
- Hearing aid evaluations
- Clinical notes and progress notes

Hearing Device Information, where applicable:

- Hearing aid make and model
- Serial numbers
- Date of fitting
- Current programming information or fitting reports
- Verification results (such as real-ear measurement or speech mapping, when completed)
- Accessories associated with the hearing devices
- Warranty information

Funding and Third-Party Documentation, where applicable and maintained within the client record:

- ADP documentation
- WSIB documentation
- VAC documentation
- NIHB documentation
- Private insurance documentation
- Funding approvals or correspondence related to hearing device acquisition

Supporting Documentation, where applicable:

- Physician referrals
- Specialist reports
- Consent documentation
- Relevant correspondence with other healthcare providers

Manufacturer Invoices and Purchase Documentation

Before releasing a manufacturer's invoice and/or purchase documentation, careful consideration should be given as to whether any of it forms part of the client's record and whether any of it is necessary to support ongoing care.
In relation to this consideration, it may be that information such as:

- hearing aid manufacturer,
- model,
- serial numbers,
- purchase date,
- warranty information,

may be important for continuity of care, but each situation merits review. In this regard, where invoices contain business information unrelated to the client's care, such as confidential supplier pricing, clinics may wish to seek legal guidance regarding whether portions of the document should be redacted before release.