

March 12, 2017

Dr. David Morgan Chair, PHIA Review Committee Department of Health and Community Services Confederation Building St. John's, NL A1B 4J7

Dear Dr. Morgan:

Thank you for the opportunity to provide commentary on the *Personal Health Information Act (PHIA)*.

Stella's Circle has 125 staff with an \$8.2 million budget. Every year, we offer services to 1000 people who face many barriers in their community. These barriers can include mental health issues, addictions, homelessness, poverty and criminal justice involvement. Our mission is to transform lives by offering real homes, real help and real work. Our services include housing programs, counselling services both in institutions and in the community and employment services. Staff of Stella's Circle include social workers, case managers, mental health workers, housing support workers and employment counsellors.

Our commentary on PHIA is limited to a general observation of the lack of clarity around the application of this legislation to community groups. The community sector is not specifically referenced and while various definitions suggest that an organization like Stella's Circle would fall under the *Personal Health Information Act*, it requires reviewing a number of definitions before being able to determine whether or not this is the case.

As part of this observation, communication and education about the legislation specifically to community groups would seem to be required.

Thank you for the opportunity to provide input.

Yours sincerely,

Lisa Browne

CEO

Stella's Circle