



Adapted PRIVACY IMPACT ASSESSMENT (Adp-PIA)

Third-Party Website or Application Name:

Chronic Pain Impact Network (CPAIN™) Web Service

DoD Component Name:

US Army Medical Command - Defense Health Program (DHP) Funded Web Service

This Adapted PIA (Adp-PIA) Form 2930A is to be used when personally identifiable information (PII) is likely to become available via a third-party website or application (such as Facebook and YouTube). Refer to the Appendix for the definition of third-party websites or applications.

This Adapted PIA (Adp-PIA) is intended to support the management of risk to privacy. If it is likely that personally identifiable information (PII) will become available via a third-party website or application, complete this form.

(1) Describe the specific purpose of the DoD Component's use of the third-party website or application.

The International Network of Outcomes Research, Inc. (INOR) Patient Pain Profiler (Chronic Pain Impact Network (CPAIN™)) is a web application tool that captures data on pain treatments, patient reported outcomes, and clinician assessments. It also provides the ability to export summarized data in the form of individual Patient Profile Reports. Patients and providers at Army Medical Treatment Facilities will use this web site. CPAIN helps patient easily explain complex problems, set goals and track progress. It helps clinicians assess patients, document outcomes, adjust treatments, and improve care. This application will be hosted on a CPAIN Application Web Server and all data sent to and from the user will be transferred using a secure protocol. The patients will access the CPAIN application through a Defense Information Systems Agency (DISA) established Reverse Proxy web service. All user and site data is stored in a database on a CPAIN Database Server.

(2) Describe any personally identifiable information (PII) that is likely to become available to the DoD Component through public use of the third-party website or application.

PII that is likely to become available to the DoD Component includes health care provider and patient demographic data as well as patient medical information.

The Privacy Policy for this website is as follows:

INOR Website Privacy Policy

International Network of Outcomes Research, Inc. ("INOR") respects the privacy of visitors to the CPAIN website (www.cpain.com). We have adopted the following privacy policy to provide information about how we collect, use and share your personal information. By visiting and using our Site, you are accepting the practices described in this privacy policy.

The information we receive from you depends on what you do when visiting our site. If you visit our site to read or download information, we collect and store, without limitation, the following types of information about you: the Internet Protocol (IP) address through which you accessed our site; the date and time you access our site; the type of browser you are using to access our site; and the referrer to our site (for example, if you find us through Google™ or Yahoo!®, that information is passed to our servers). We use this and other internal server specific information to measure the number of visitors to different sections of our site, so that we can make our site more useful to our visitors. We sometimes share aggregate information, including without limitation the number of visitors using a particular Internet Explorer version or total number of visitors to a site or a web site page.

"Personal Information" is any information or set of information that is recorded in any form, pertains to or is about you, and can be linked to or used to identify you. Personal Information does not include information that is encoded, de-identified, or publicly available information that has not been combined with non-public personal information. Personal Information does not include information that pertains to or is about a specific person from which that person could not reasonably be identified.

The goals of CPAIN are to improve clinical outcomes in patients with chronic pain and to support the research efforts of the pain management community through the collection, evaluation and dissemination of clinically relevant and meaningful treatment and outcomes data. To that end, if you

a patient visiting our website to complete an assessment, the Personal Information that you provide about yourself may be shared with your healthcare provider (HCP). Additionally, if you consent to participate in the CPAIN Research Study, your information may be de-identified (all personally identifiable information is removed) and made available to researchers who may perform analyses of aggregate CPAIN data. If you are a HCP visiting our website to complete an assessment and you consent to participate in the CPAIN Research Study, your information may also be de-identified and made available to researchers who may perform analyses of the aggregate CPAIN data.

INOR may utilize independent contractors ("Contractors") to provide specific services related to CPAIN or the services provided on the CPAIN website, including but not limited to, website development, maintenance and statistical analysis. Contractors may have limited access to information collected on the website, including Personal Information, in the course of providing such services. With regard to INOR's use of Contractors and otherwise, INOR is compliant with the requirements of the Health Information Portability and Accountability Act of 1996, the Health Information Technology for Economic and Clinical Health ("HITECH") provisions of the American Recovery and Reinvestment Act of 2009, and the regulations promulgated thereunder ("HIPAA"). Except as required or permitted by law or otherwise stated herein, we do not share any Personal Information about you outside of INOR.

(3) Describe the circumstances under which PII will likely become available on the third-party website or application.

The PII becomes available when the users of this third-party website input their personal information.

(4) With whom will the DoD Component share PII?

The PII will be shared with health care providers and research personnel within the Madigan Healthcare System who are authorized access to this information.

(5) Will the DoD Component maintain PII? If yes, for how long, and under what circumstances?

Madigan Healthcare System and Walter Reed National Military Medical Center (WRNMMC) are participating jointly in the evaluation program for the implementation of CPAIN an electronic clinical pain assessment and tracking tool protocol, in one primary care Warrior Transition Clinics at each mentioned medical treatment facility. The PII for the Madigan Healthcare System patients will not be shared with the health care providers participating in this research endeavor at WRNMMC.

Each site has been approved in this collaborative, two site research project. PII will only be maintained for patients who voluntarily choose to participate in the internal review board (IRB) approved research protocol. PII will not be maintained on patients who are not enrolled in the protocol. The program's IRB determined and approved the five-year period for retaining PII collected by the program.

(6) Describe the means and steps by which the DoD Component will secure PII that it uses or maintains.

There are privacy risks that are not within the control of the Madigan Healthcare System. Some of the security measures in place to mitigate risks to the PII retained by the Madigan Healthcare System include:

- The PII will be used only for the intended purpose of this application. Only personnel with a need-to-know can access the data.
- The use of firewalls, authentication, and encryption will be used to secure information processed. Vulnerability assessments are conducted to ensure data is protected.
- While data is being processed, all available security best practices are adhered to. Security controls are in place to ensure data is stored, processed, and transmitted by approved secure methods.
- Individuals who access the PII must complete Information Assurance Awareness, Privacy Act, and Health Information Portability and Accountability Act (HIPAA) training on an annual basis.

(7) Describe what other privacy risks exist and how the DoD Component will mitigate those risks.

The risks associated with the collection, use, and storage of personally identifiable information (PII) and protected health information (PHI) are unauthorized access and unauthorized disclosure. There are administrative, physical, and technical security safeguards in place to mitigate these risks.

(8) Will the DoD Component's activities create or modify a "system of records" under the Privacy Act? If yes, describe.

No.

