



Adapted PRIVACY IMPACT ASSESSMENT (Adp-PIA)

Third-Party Website or Application Name:

Elsevier Health Education Systems Incorporated (HESI) Web Application

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 Elsevier Health Education Systems Inc. (HESI) web application provides diagnostic tests for nursing and allied health markets. Several of the US Army Medical Treatment Facilities are Phase 2 training sites for the US Army Practical Nurse Course (PNC). The HESI web application diagnostic tests provide the faculty with the tools to predict how their students will perform on the nursing licensure examination. The testing facilitator downloads the HESI diagnostic tests to a local server and administers the tests. The Server Exam Delivery Software Package (SEDS) is the middleware used to deliver and return the diagnostic tests to the Elsevier website. The completed tests are returned to the Elsevier web application for scoring and analysis. Students and instructors use this resource to develop individual and group training plans.

(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.

The PII that is likely to become available to the DoD Component through public use of this third-party web application is the student name, student number, and test results.

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

The PII becomes available on the third-party website when the testing facilitator submits the completed tests to the Elsevier HESIiNet for scoring and analysis. The Elsevier website policy statement is available at www.elsevier.com/legal/privacy-policy and is as follows:

Elsevier is committed to maintaining your confidence and trust with respect to the privacy of the personally identifiable information we collect from you. This privacy policy sets forth our practices regarding collection, use and disclosure of information collected through or in connection with the Elsevier corporate website and all other Elsevier websites that post a link to this privacy policy (each a "Site").

Collection and Registration of Personal Information

We may request users of this Site to provide personal information. The information collected directly from a user may include contact information such as the user's name, e-mail address, and postal address.

In order to access certain content and to make use of the full functionality and advanced personalization features of the Site we ask you to register by completing and submitting a registration form, which may request additional information, such as work setting or principal professional field.

Automatic Collection of Information

This Site automatically collects certain information from your web browser regarding your use of the Site. Examples of information collected automatically from all users include the Internet Protocol ("IP") address used to connect your computer to the Internet; computer and connection information such as browser type and version, operating system, and platform; and full Uniform Resource Locator ("URL") click stream data, including date and time, and content you viewed or searched for on the Site.

This Site also collects information through the use of "cookies" or similar technologies. Cookies are anonymous, unique alphanumeric identifiers sent to your browser from a website's computers and stored on your computer's hard drive. The type of information collected as a result of a cookie being stored on your computer is specific to your computer. "Session" cookies collect information about your use of the Site (e.g., whether you are logged in) and to give you a more personalized browsing experience and help you navigate the Site more efficiently from page to page. These cookies are temporary and are deleted when you close your browser. "Persistent" cookies gather statistical information about repeat usage from your computer or workstation. In general, cookies do not contain personally identifiable information, but when you furnish your personal information through the Site, this information may be linked to the non-personally identifiable data stored in cookies sent to your browser from the Site.

We and our affiliated group companies and service providers may use cookies, "web beacons" or clear . gifs, or similar technologies to collect and use this information for the purposes of usage analysis (including for the purposes of reporting and paying royalties and license fees to third-party providers, such as authors, societies and other copyright holders and content distributors as well as tracking and analyzing user preferences and trends), delivery and management of our advertising, promotions and surveys, quality control and administering, customizing and improving the Site.

You can prevent your browser from accepting certain cookies, have the browser require your consent before a new cookie is placed in your browser, or block cookies altogether by accessing your browser's privacy preferences menu. However, if you block cookies altogether, you may not be able to register, login to the Site, or make use of the full features and functionality of the Site.

How Personal Information Is Used

We use the personal information that you provide for such purposes as:

- Completion and support of the activity for which the information was provided, such as allowing access to or delivery of our products or services, processing or fulfilling an order, or responding to your requests or inquiries;
- Website and system administration, such as for the technical support of the Site and its computer system, including processing computer account information, information used in the course of securing and maintaining the Site, and verification of Site activity by the Site or its agents;
- Tailoring or customizing content or design of the Site during a single visit to the Site and individualized personalization of the Site on repeat visits;
- Research and development to enhance, evaluate and improve the Site and our products and services;
- Pseudonymous analysis to create a profile used to determine the habits, interests or other characteristics of users for purposes of research, analysis and anonymous reporting; and
- Communicating with you about changes or updates to the Site and our products and services and special offers, promotions or market research surveys.

We may on occasion also match or combine the personal information that you provide with information that we obtain from other sources or that is already in our records, whether collected online or offline or by predecessor or affiliated group companies, for such purposes.

Disclosure of Personal Information to Third Parties

Access to your personal information is restricted to our employees, agents, representatives, service providers, and entities for which we are acting as an agent, licensee or publisher, such as societies, for the purposes set forth above. Your personal information may be used by all of our trading names and affiliated group companies and transferred to other countries for processing. These countries may not have similar data privacy laws, but if we transfer your information in this way, we will take steps to ensure that your information continues to be protected.

We also may share your personal information with our affiliated group companies worldwide and/or with non-affiliated third parties that wish to send you information about their products and services that may be of interest to you. We will not pass your personal information to such third parties if you indicate that you do not wish us to do so.

If this site offers an online content database or learning service ("Service") and you access the Service through an institution-sponsored subscription, your personal information and certain usage data gathered through the Service, such as the number of items you downloaded, any non-subscribed items you accessed, and test scores, may be shared with your institution for the purposes of usage analysis, subscription management, course management, and testing and remediation. If your institution is a corporation or other business entity, additional usage data, such as the types of records you viewed and the number of searches you ran, also may be shared for the purposes of cost attribution and departmental budgeting.

We will not otherwise disclose any personal information without your consent except under the following circumstances:

- in response to subpoenas, court orders, or legal process, or to establish or exercise our rights to defend against legal claims;
- if we believe it is necessary to investigate, prevent, or take action regarding illegal activities, suspected fraud, safety of person or property, violation of our policies, or as otherwise required by law; and
- if Elsevier, this Site, or a related asset or line of business is acquired by, transferred to or merged with another company.

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

The PII may be shared with faculty who have a need-to-know this information.

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

The PII will be retained for a minimum of two years in accordance with the governing State Board of Nursing Rules and Regulations.

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

Some of the security measures in place to mitigate risks to the PII 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 and Privacy Act 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 PII 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.

The DoD Component activities will not require the creation or modification of a "system of records" under the Privacy Act. The Privacy Act system of records notice, A0040-66a DASG, authorizes the collection of PII for education and training files.