



PRIVACY IMPACT ASSESSMENT (PIA)

For the

Endoscopic Medical Simulator and Training Management System
(GI Mentor™ and MentorLearn™)

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

SECTION 1: IS A PIA REQUIRED?

a. Will this Department of Defense (DoD) information system or electronic collection of information (referred to as an "electronic collection" for the purpose of this form) collect, maintain, use, and/or disseminate PII about members of the public, Federal personnel, contractors or foreign nationals employed at U.S. military facilities internationally? Choose one option from the choices below. (Choose (3) for foreign nationals).

- (1) Yes, from members of the general public.
- (2) Yes, from Federal personnel* and/or Federal contractors.
- (3) Yes, from both members of the general public and Federal personnel and/or Federal contractors.
- (4) No

* "Federal personnel" are referred to in the DoD IT Portfolio Repository (DITPR) as "Federal employees."

b. If "No," ensure that DITPR or the authoritative database that updates DITPR is annotated for the reason(s) why a PIA is not required. If the DoD information system or electronic collection is not in DITPR, ensure that the reason(s) are recorded in appropriate documentation.

c. If "Yes," then a PIA is required. Proceed to Section 2.

e. Does this DoD information system or electronic collection have an OMB Control Number?

Contact the Component Information Management Control Officer or DoD Clearance Officer for this information.

This number indicates OMB approval to collect data from 10 or more members of the public in a 12-month period regardless of form or format.

Yes

Enter OMB Control Number

Enter Expiration Date

No

f. Authority to collect information. A Federal law, Executive Order of the President (EO), or DoD requirement must authorize the collection and maintenance of a system of records.

(1) If this system has a Privacy Act SORN, the authorities in this PIA and the existing Privacy Act SORN should be the same.

(2) Cite the authority for this DoD information system or electronic collection to collect, use, maintain and/or disseminate PII. (If multiple authorities are cited, provide all that apply.)

(a) Whenever possible, cite the specific provisions of the statute and/or EO that authorizes the operation of the system and the collection of PII.

(b) If a specific statute or EO does not exist, determine if an indirect statutory authority can be cited. An indirect authority may be cited if the authority requires the operation or administration of a program, the execution of which will require the collection and maintenance of a system of records.

(c) DoD Components can use their general statutory grants of authority ("internal housekeeping") as the primary authority. The requirement, directive, or instruction implementing the statute within the DoD Component should be identified.

10 U.S.C. 3013, Secretary of the Army; 10 U.S.C. Chapter 55, Medical and Dental Care; Army Regulation 40-66, Medical Record Administration and Health Care Documentation; Army Regulation 40-68, Clinical Quality Management, Army Regulation 40-5, Preventive Medicine, and E.O. 9397 (SSN).

g. Summary of DoD information system or electronic collection. Answers to these questions should be consistent with security guidelines for release of information to the public.

(1) Describe the purpose of this DoD information system or electronic collection and briefly describe the types of personal information about individuals collected in the system.

The GI Mentor™ simulator, along with MentorLearn™ web service, comprise the only approved platform to conduct the Society of American Gastrointestinal and Endoscopic Surgeons (SAGES) Fundamentals of Endoscopic Surgery (FES) examination. All surgical residents are required to pass the examination. The medical treatment facility submitting this PIA has been approved by SAGES to become a FES Testing Center. The following provides a description of the applications used in this testing program:

- GI Mentor is a top of the line endoscopic medical simulator for the training of gastrointestinal upper and lower endoscopic procedures, offering a comprehensive library of modules with more than 120 tasks and virtual patient cases. The simulator runs certain virtual 3D surgical tasks on the laptop, and tracks the movements of the haptic device used by a test taker, much like a video game. The simulator provides multiple training opportunities with true to life patient cases offering realistic scenarios of clinical situations. It provides an excellent environment for practicing clinical procedures in a safe and realistic manner.
- MentorLearn integrates the GI Mentor simulator and educational content into a web based simulator curricula management system to help training programs incorporate the simulators into their curriculum and demonstrate efficient and effective training for accreditation and certification purposes. PII is collected by Mentor Learn when the designated FES examination proctor registers individuals for an account. The types of records in MentorLearn include surgical residents at the military treatment facility (MTF) using this application as well as surgical residents from the civilian medical community who use this application at the military test site.

No PII is collected by GI Mentor. MentorLearn collects user's name, surgical specialty, training institution, and work contact information.

(2) Briefly describe the privacy risks associated with the PII collected and how these risks are addressed to safeguard privacy.

The risks associated with the collection, use, and storage of PII are unauthorized access and unauthorized disclosure. Appropriate technical, administrative, physical safeguards are in place to minimize these risks as indicated in Section 3d and 3f below.

h. With whom will the PII be shared through data exchange, both within your DoD Component and outside your Component (e.g., other DoD Components, Federal Agencies)? Indicate all that apply.

Within the DoD Component.

Specify.

PII will be shared with the Surgical Residency Program Director and the designated FES examination proctors who administer the examinations at the MTF test site.

Other DoD Components.

Specify.

Other Federal Agencies.

Specify.

State and Local Agencies.

Specify.

Contractor (Enter name and describe the language in the contract that safeguards PII.)

Specify.

Other (e.g., commercial providers, colleges).

Specify.

PII for the civilian surgical residents using this application may be shared with their training institution in accordance with provisions in the training agreement. There are clauses in this agreement requiring the protection of personal information.

i. Do individuals have the opportunity to object to the collection of their PII?

Yes

No

(1) If "Yes," describe method by which individuals can object to the collection of PII.

Individuals must accept and agree to the MentorLearn terms of use and privacy policy outlined in Section 2k below. If individuals object to the collection of their PII, they will not be able to use this application.

(2) If "No," state the reason why individuals cannot object.

j. Do individuals have the opportunity to consent to the specific uses of their PII?

Yes

No

(1) If "Yes," describe the method by which individuals can give or withhold their consent.

Individuals must accept and agree to the MentorLearn terms of use and privacy policy outlined in Section 2k below. If individuals object to the use of their PII, they will not be able to use this application.

(2) If "No," state the reason why individuals cannot give or withhold their consent.

k. What information is provided to an individual when asked to provide PII data? Indicate all that apply.

- | | |
|---|---|
| <input type="checkbox"/> Privacy Act Statement | <input checked="" type="checkbox"/> Privacy Advisory |
| <input checked="" type="checkbox"/> Other | <input type="checkbox"/> None |

Describe each applicable format.

MentorLearn Terms of Use and Privacy Policy

We are committed to protecting your privacy and developing technology that gives you a safe online experience. This Privacy Policy applies to the "mentorlearn.com" web page and simulator training curricula management platform (collectively, "MentorLearn"), which is owned or operated by Symbionix USA Corporation or its affiliates (collectively, "Symbionix"). By using MentorLearn, you consent to the data practices described in this Privacy Policy.

The Training Center

MentorLearn is an online simulator training curricula management platform. MentorLearn is licensed by Symbionix to hospitals, training centers or companies (each the "Training Center") that, in turn, provide you with use of MentorLearn. As such, all information provided on MentorLearn is controlled by the Training Center and all information gathered by MentorLearn, including your use of the educational materials on MentorLearn and use of simulators, is provided to the Training Center and its appointed administrators. We can not control use of your information by the Training Center or its administrators and are nor responsible for such use.

In order to operate MentorLearn we require your information such as user name and email address. MentorLearn allows you to anonymize that information.

When you become a registered user (a "User") of MentorLearn, you voluntarily provide personal information to Symbionix. Users voluntarily provide identifiable information such as their user name, specialty, institution, and email address. We require Users to submit a valid email address so that we may contact them about changes to MentorLearn and other important matters. All such information may be collected by MentorLearn. However, if you so agree with the Training Center, MentorLearn allows you to anonymize this information so that the user name you will provide need not be your real name and the email address you provide may be a non identifiable address designated by the Training Center. We urge you to discuss anonymizing your information with the Training Center. In addition, there is also information about your computer hardware and software that is automatically collected by Symbionix. This information can include your IP address, browser type, access times, and referring Web site addresses. This information is used by Symbionix to operate, and to maintain the quality of, its services, and to provide general statistics regarding use of MentorLearn. Use of MentorLearn does not require disclosing sensitive personal information, such as race, religion, or political affiliations, and you are encouraged not to share such information on MentorLearn.

Protection and use of your Personally Identifiable Information

Simbionix does not sell, rent or lease its Users lists to third parties. We will not share with anyone, other with the Training Center's administrator, any information (such as name or email address) that can identify a User personally, or allow a third party to contact a User, except under the special circumstances described below. Simbionix collects and uses your personal information to operate MentorLearn and deliver the services you have requested. Simbionix may also contact you via surveys to find out about your opinion concerning MentorLearn and other matters. Simbionix keeps track of MentorLearn and pages that its Users visit within MentorLearn in order to determine what content and services are most popular. This data is used to deliver customized content to Users whose behavior indicates that they are interested in a particular subject area.

Special circumstances under which we may share personally identifying information outside of the MentorLearn platform. Simbionix may share personally identifying information with a User's direct, explicit permission. We also contract with other companies and individuals to help us provide services. For example, we may host some of MentorLearn on another company's computer, such as Amazon, or we may hire a company to answer customer questions about our products and other services. In order to perform services to MentorLearn, these other companies may have limited access to some of the information we maintain about you. We require all such companies to comply with the terms of our Privacy Policy, to limit their access to any personal information to the minimum necessary to perform their obligations, and not to use the information they may access for purposes other than fulfilling their responsibilities to us. Simbionix may share personally identifying information in other special cases when we have good reason to believe that sharing this information is necessary to identify or bring legal action against someone who may not be following the Terms of Use, or may be causing injury to (either intentionally or unintentionally) other Users, Simbionix itself, or anyone else that could be harmed by such activities. Simbionix will disclose your personal information, without notice, if required to do so by law or in the good faith belief that such action is necessary to: (a) conform to the edicts of the law or comply with legal process served on Simbionix; (b) protect and defend the rights or property of Simbionix; or (c) act under exigent circumstances to protect the personal safety of users of Simbionix, or the public. Finally, we reserve the right to, transfer and assign customer contact and site usage information collected on MentorLearn as part of a sale, merger, recapitalization, or similar business transaction while maintaining a similar policy.

Uploading materials onto MentorLearn

Simbionix allows the Training Center's administrators to upload data onto MentorLearn. If you are an administrator, please remember that any information uploaded on MentorLearn is visible to MentorLearn's Users or administrators and that you should exercise caution when deciding to disclose any personal information. In addition, you should exercise caution and be aware of professional ethical guidelines and laws that restrict the disclosure of certain personal and health information about patients. Any information (including personal and medical information) that Users reveal on MentorLearn is not subject to this Privacy Policy and might be seen by Users and administrators not under the control of Simbionix.

Anonymous Information. Simbionix uses non-identifying and aggregate information to better design the MentorLearn platform and to share with third parties for the purposes of product development, research or statistical analysis. This information does not personally and specifically identify you but is derived from your use of MentorLearn. For example, Simbionix may tell a researcher that a specific number of Users viewed practiced a simulator, however, we would not disclose any personal information that could be used to identify those Users.

Security of your Personal Information. Simbionix secures the personally identifiable information you provide on computer servers in a controlled, secure environment, protected from unauthorized access, use or disclosure. Although Simbionix makes every reasonable attempt to secure your information, there is always some risk in transmitting information over the Internet. There is always a risk that thieves could find some way to circumvent our security systems. Although we take appropriate measures to protect your information, we cannot guarantee that the personal information that we collect will never be disclosed in a manner that is inconsistent with this Privacy Policy.

Protect your privacy. Please keep in mind that if you directly disclose personally identifiable information or personally sensitive data through MentorLearn, this information may be collected and used by others. If you are a User or administrator of MentorLearn, it is solely your responsibility to

control any and all access to your username and password, to log out when you leave MentorLearn, and to immediately inform Simbionix of any reason to disable your username and/or password.

Links to other sites. The MentorLearn platform and materials uploaded on MentorLearn by the training Center or its administrators may contain links to other sites. Simbionix is not responsible for the privacy practices of such other sites. Simbionix encourages you to be aware when you leave the MentorLearn.com domain and to read the privacy statements of each and every website that collects personally identifiable information. This Privacy Policy applies solely to information collected by MentorLearn.

Use of Cookies. MentorLearn does not use "cookies" to store personally identifying sensitive information. MentorLearn does use "cookies" to help you personalize your online experience. A "cookie" is a text file that is placed on your hard disk by a Web page server. Cookies cannot be used to run programs or deliver viruses to your computer. Cookies are uniquely assigned to you, and can only be read by a Web server in the domain that issued the cookie to you. One of the primary purposes of cookies is to provide a convenience feature to save you time. The purpose of a cookie is to tell the Web server that you have returned to a specific page. For example, if you personalize MentorLearn, register on the Simbionix Web sites, or sign up to receive Simbionix services, a cookie helps Simbionix to recall your specific information on subsequent visits. When you return to MentorLearn, the information you previously provided can be retrieved, so you can easily use the features that you customized. You have the ability to accept or decline cookies. Most Web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. If you choose to decline cookies, you will not be able to fully experience the interactive features of MentorLearn.

Log Files. Simbionix uses IP addresses (an identifier for computers on the Internet) to analyze trends, administer the site, gather broad demographic information for aggregate use, and comply with applicable laws. IP addresses are not linked directly to personally identifiable information.

Simbionix Employees. At Simbionix, any employee access to personal information is authorized for business purposes only and is based on the sensitivity of the information and our employees' or agents' need to know. Simbionix reminds employees regularly of their responsibility for using personal information. Disregard of this responsibility will result in disciplinary action, including termination in appropriate cases.

Changes to this Policy. This Privacy Policy was last updated on June 28, 2011. Simbionix reserves the right to modify or update this Privacy Policy in its sole discretion in order to, among other things, reflect Simbionix' and customer feedback. Simbionix encourages you to periodically review this Privacy Policy to be informed of how Simbionix is protecting your information. Your continued use of MentorLearn following these changes will constitute your consent to the Privacy Policy, as changed. If any change to the Privacy Policy is unacceptable to you, your only recourse is to terminate your use of MentorLearn.

NOTE:

Sections 1 and 2 above are to be posted to the Component's Web site. Posting of these Sections indicates that the PIA has been reviewed to ensure that appropriate safeguards are in place to protect privacy.

A Component may restrict the publication of Sections 1 and/or 2 if they contain information that would reveal sensitive information or raise security concerns.