



PRIVACY IMPACT ASSESSMENT (PIA)

For the

Online Medical Education Platform (MedBridge)

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.

SECTION 2: PIA SUMMARY INFORMATION

a. Why is this PIA being created or updated? Choose one:

- New DoD Information System
- New Electronic Collection
- Existing DoD Information System
- Existing Electronic Collection
- Significantly Modified DoD Information System

b. Is this DoD information system registered in the DITPR or the DoD Secret Internet Protocol Router Network (SIPRNET) IT Registry?

- Yes, DITPR Enter DITPR System Identification Number
- Yes, SIPRNET Enter SIPRNET Identification Number
- No

c. Does this DoD information system have an IT investment Unique Project Identifier (UPI), required by section 53 of Office of Management and Budget (OMB) Circular A-11?

- Yes
- No

If "Yes," enter UPI

If unsure, consult the Component IT Budget Point of Contact to obtain the UPI.

d. Does this DoD information system or electronic collection require a Privacy Act System of Records Notice (SORN)?

A Privacy Act SORN is required if the information system or electronic collection contains information about U.S. citizens or lawful permanent U.S. residents that is retrieved by name or other unique identifier. PIA and Privacy Act SORN information should be consistent.

- Yes
- No

If "Yes," enter Privacy Act SORN Identifier

DoD Component-assigned designator, not the Federal Register number.
Consult the Component Privacy Office for additional information or
access DoD Privacy Act SORNs at: <http://www.defenselink.mil/privacy/notices/>

or

Date of submission for approval to Defense Privacy Office

Consult the Component Privacy Office for this date.

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.

A0040-66a DASG: 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).

A0040-66b DASG: 10 U.S.C. 3013, Secretary of the Army; 10 U.S.C. 1071-1085, Medical and Dental Care; 50 U.S.C. Supplement IV, Appendix 454, as amended, Persons liable for training and service; 42 U.S.C. Chapter 117, Sections 11131-11152, Reporting of Information; 10 U.S.C. 1097a and 1097b TRICARE Prime and TRICARE Program; 10 U.S.C. 1079, Contracts for Medical Care for Spouses and Children; 10 U.S.C. 1079a, CHAMPUS; 10 U.S.C. 1086, Contracts for Health Benefits for Certain Members, Former Members, and Their Dependents; E.O. 9397 (SSN); DoD Instruction 6015.23, Delivery of Healthcare at Military Treatment Facilities (MTFs); DoD Directive 6040.37, Confidentiality of Medical Quality Assurance (QA) Records; DoD 6010.8-R, Civilian Health and Medical Program of the Uniformed Services (CHAMPUS); Army Regulation 40-66, Medical Record Administration and Health Care Documentation.

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.

MedBridge is a web based platform that provides clinicians and health care organizations an all-in-one online education forum that positively impacts the knowledge of the clinicians and their patients. It provides access to unlimited continuing education units, patient education, and home exercises for a variety of disciplines to include physical therapy, occupational therapy, speech language pathology and athletic training. The health care organization subscribes with MedBridge to obtain access to its educational programs. After registering for an account, the clinician will have access to continuing education courses, clinical references, and injury education materials.

A secondary feature of MedBridge is the ability for the clinician to provide customized home exercise instructional materials to their patients. The clinicians will confirm participation with their patients and notify MedBridge that the designated patients have given them permission to send the home exercise program to their Email address. MedBridge will then contact the patient, on behalf of the provider, and provide instructions for accessing the home exercise program on the MedBridge Website. Patients must agree to the MedBridge Website Terms of Use and Privacy Policy to utilize this MedBridge service.

The types of PII collected include the name and Email address of the clinicians and patients who opt to utilize the MedBridge services.

(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 PII collected are unauthorized access and unauthorized disclosure. The security measures to reduce or mitigate these risks are addressed in Section 2k (MedBridge Privacy Policy) and Section 3d 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.

Authorized personnel within the US Army Medical Treatment Facility (MTF) using the MedBridge services.

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.

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.

Use of the online MedBridge services is voluntary for the clinicians and their patients. Individuals who fail to provide their PII and/or disagree with the MedBridge Website terms and policies posted in Section 2k below, will be denied access to the MedBridge services.

In addition, patients who opt to receive the MedBridge services must consent to Email communications with their health care provider by signing MEDCOM Form 756, Authorization To Send and Receive Medical Information by Electronic Mail. This form is placed in the patient's medical record and is also posted in Section 2k below.

(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.

Use of the online MedBridge services is voluntary for the providers and their patients. Individuals who fail to provide their PII and/or disagree with the MedBridge Website terms and policies posted in Section 2k below, will be denied access to its services. Use of the online MedBridge services is voluntary for the providers and patients.

In addition, patients who opt to receive the MedBridge services must also consent to Email communications with their provider by signing MEDCOM Form 756, Authorization To Send and Receive Medical Information by Electronic Mail. This form is retained in the patient's medical record and is posted in Section 2k below.

(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 type="checkbox"/> Privacy Advisory |
| <input checked="" type="checkbox"/> Other | <input type="checkbox"/> None |

Describe each applicable format.

MedBridge Inc. Website Privacy Policy.

I. General Policy

A. Acceptance of Terms

MedBridge Inc. ("MedBridge") is committed to protecting your privacy when you visit the MedBridge website located at the URL www.medbridgeeducation.com and www.medbridgeed.com ("MedBridge Site"). This Privacy Policy explains to you how we collect and use your information. This document should be read in conjunction with the MedBridge Terms and Conditions, and we reserve the right to append or otherwise modify this privacy statement at any time.

B. Term Definitions

1. The term "MedBridge Site" refers to the MedBridge website accessible through the URL www.medbridgeed.com or www.medbridgeeducation.com.
2. The term "Medbridge" refers to MedBridge Inc..
3. The term "User Profile" refers to a profile posted by a User on the MedBridge Site.
4. The terms "you", "your" and/or "User" refer to any individuals and/or entities visiting and/or otherwise accessing the MedBridge Site for any reason.
5. The term "Content" refers to all information, data, text, software, music, sound, photographs, graphics, video, messages, tags, or other materials posted and/or otherwise displayed on, to, or at the MedBridge Site.
6. The term "Personal Information" includes, but is not limited to, any information that identifies or describes an individual, including his or her name, professional licensing information, social security number, physical description, age, gender, marital status, health status, financial status, home address, home telephone number, education, financial matters, and medical or employment history. Personal Information also includes statements made by, or attributed to, a User.

II. Your Personal Information

A. Information Collected by MedBridge

Information such as your name and email address is collected at the MedBridge site when you: (i) register for any Course offered by or via the MedBridge Site; (ii) sign up for any e-mail alerts or communications. Personal Information may also be collected any time a User provides such information voluntarily to MedBridge via the MedBridge Site.

Personal Information is provided at your own risk. By providing your Personal Information, you are communicating your consent to MedBridge' collection, use and disclosure of such Personal Information for the purposes for which you provided the information to MedBridge, and as described in this Privacy Policy. MedBridge will not collect any Personal Information about you unless you agree to disclose such information personally.

B. Using your Information

Information is collected about you in order to establish and enhance our relationship with you. MedBridge's use of this information includes the following: (i) to personalize your experience, so we are better able to respond to your individual needs; (ii) improve our website through your feedback; (iii) more effectively responding to customer service requests and support needs and improve customer service; (iv) process transactions; (v) contacting you; (vi) conducting research and compiling aggregate data for internal and external business purposes (vii) any other purpose disclosed to you at the time we collect your information.

C. Updating your Information

On MedBridge you are able to correct, update, review, or delete information you have submitted by going back to the specific tool and making the desired changes. Remember that if you refuse to consent to, opt out of, or withdraw your consent, we may not be able to offer you certain services or benefits.

D. Information Sharing and Disclosure

We may share your information with trusted third parties who assist us in operating our website, conducting our business, or serving you, as long as those parties agree to keep this information confidential. We may also release your information when we believe it is needed to comply with the law, enforce our site policies, or protect ours or others rights, property, or safety.

Non-personally identifiable information may be provided to other parties for marketing, advertising, or other uses.

E. Changes in MedBridge Inc.

If MedBridge is sold, merged, or otherwise transferred, personal information may be transferred along with it.

F. Additional Information Use

We may use your email for transactional purposes, as well as for promotional purposes.

Transactional purposes include confirming reservations and notifying you about changes to your account. Promotional purposes include sending you newsletters about new features, special offers, promotional announcements, consumer surveys, and other items concerning our service. During registration at the MedBridge site, you will be signed up to receive promotional email newsletters from MedBridge. Email messages may contain code that enables our database to track your usage of the emails to determine whether the email was opened and what links, if any, were clicked. Should you prefer not to receive promotional emails from us, please edit the preferences in your account menu or click Unsubscribe at the bottom of any promotional emails.

III. Automatically Collected Information

A. Information Collected Via Technology As you use MedBridge, certain information may also be passively collected and stored on our or our service providers' server logs, including your Internet protocol address, browser type, and operating system. We also use Cookies and navigational data like Uniform Resource Locators (URL) to gather information regarding the date and time of your visit and the solutions and information for which you searched and viewed, or on which of the advertisements displayed on MedBridge you clicked. This type of information is collected to make MedBridge and solutions more useful to you and to tailor the experience with LivingSocial to meet your special interests and needs.

We engage in remarketing to market our sites across the web. When a user visits our site, a cookie is dropped on the user. Users with this cookie may be targeted across advertising networks to receive relevant advertisements. You may opt out of this ad serving using the Network Advertising Initiative (NAI) opt-out page (http://www.networkadvertising.org/managing/opt_out.asp).

An "Internet protocol address" or "IP Address" is a number that is automatically assigned to your computer when you use the Internet. In some cases your IP Address stays the same from browser session to browser session; but if you use a consumer internet access provider, your IP Address probably varies from session to session. For example, we, or our service providers, may track your IP Address when you access MedBridge to assist with ad targeting.

"Cookies" are small pieces of information that a website sends to your computer's hard drive while you are viewing a website. We may use both session Cookies (which expire once you close your web browser) and persistent Cookies (which stay on your computer until you delete them) to provide you with a more personal and interactive experience with MedBridge. Persistent Cookies can be removed by following your Internet browser help file directions.

We may also enable advertisers and ad servers to promote third-party products and/or services by placing advertisements on MedBridge. These advertisers and ad servers may use Cookies and/or "Web Beacons" (which are usually small, transparent graphic images) in order to monitor information related to served advertisements. Clicking on such advertisements will direct you to the website of a third-party and the advertiser. This Privacy Policy does not cover the privacy practices of any advertisers or ad servers.

IV. Safety Measures

A. Internet Security

We use a variety of security measures to maintain the safety of your personal information when you place an order or access your personal information: (i) A secure server. (ii) All sensitive/credit information is transmitted via Secure Socket Layer (SSL) technology and then entered into our Payment gateway providers database accessible only to those authorized who are required to keep the information confidential. (iii) All data stored on the MedBridge Site server(s) is stored in a

database "behind" a secure firewall. (iv) There is no permissible access to the database outside of the hosted environment. (v) After a transaction, your private information (credit card information) will not be stored on our servers.

B. Security Limitations Disclaimer

MedBridge cannot and does not guarantee that Personal Information you post on the MedBridge Site will not be accessed by unauthorized persons. Despite MedBridge's efforts to safeguard your personal information, there is always a risk of security breach. MedBridge is not responsible for circumvention of any privacy settings or security measures of the MedBridge Site. You understand and acknowledge that, even after removal, copies of Personal Information on User Profiles may remain viewable in cached and archived pages or if other Users have copied or stored your Personal Information.

The MedBridge site might be linked to other websites. Please be aware that MedBridge is not responsible for the privacy policies of those other sites. If users provide information directly to websites other than MedBridge, different rules may apply for the use of personal information. You are solely responsible for your privacy settings, and MedBridge is not and will not be responsible for Personal Information shared by you via a User Profile or the settings associated therewith.

C. Children's Privacy

In compliance with the requirements of COPPA (Children's Online Privacy Protection Act), MedBridge will not collect any information from anyone under 13 years of age. Our website and courses are directed at people who are older than 13 years.

Please direct additional Questions or Concerns to support@medbridgeed.com.

MEDICAL RECORD - CONSENT FORM

Authorization To Send And Receive Medical Information By Electronic Mail

For use of this form see, MEDCOM Supplement 1 to AR 40-66; the proponent agency is MCHO

SECTION I - PATIENT DATA

1. NAME (Last, First, Middle Initial)
2. DATE OF BIRTH (YYYYMMDD)
3. SOCIAL SECURITY NUMBER (Last four only)
4. E-MAIL ADDRESS
5. TELEPHONE NUMBER

SECTION II - CONDITIONS FOR USE OF E-MAIL

Health care providers cannot guarantee but will use reasonable means to maintain security and confidentiality of electronic mail (E-mail) information sent and received. You must acknowledge and consent to the following conditions:

1. E-mail is not appropriate for urgent or emergency situations. Healthcare providers will respond within . Contact the clinic telephonically if you have not received a response after .
2. E-mail must be concise. You should schedule an appointment if the issue is complex or sensitive precluding discussion by E-mail.
3. E-mail should not be used for communications regarding sensitive medical conditions such as sexually transmitted diseases, HIV/AIDS, spouse or child abuse, chemical dependency, etc.
4. Medical or dental treatment facility staff may receive and read your messages.
5. E-mails related to health consultation will be copied, pasted, and filed.

SECTION III - RISKS OF USING E-MAIL

Transmitting information by E-mail has risks that you should consider these include, but are not limited to the following risks:

1. E-mails can be intercepted, altered, forwarded. or used without authorization or detection.
2. E-mails can be circulated, forwarded and stored in paper and electronic files.
3. E-mail senders can easily type in the wrong E-mail address.
4. E-mail may be lost due to technical failure during composition, transmission, and/or storage.

SECTION IV - PATIENT GUIDELINES

To communicate by E-mail, the patient shall:

1. Place the category (topic) of the communication in the subject line of the E-mail (for example, appointment, prescription, medical advice, etc.)
2. Include the patient's name, telephone number, family member prefix, and the last 4 numbers of the sponsor's social security number (for example: 30/0858) in the body of the E-mail.
3. Acknowledge receipt of the E-mail when requested to do so by a health care provider.
4. Inform the medical or dental treatment facility of changes in E-mail address by completing a new consent form.
5. Notify the health care provider of any types of information considered by the patient to be

inappropriate for E-mail.

6. Take precautions to preserve the confidentiality of E-mail.

SECTION V - PATIENT ACKNOWLEDGEMENT AND AGREEMENT

I have read and fully understand the information in this authorization form. I consent to the E-mail conditions and agree to abide by the guidelines listed above. I further understand that this E-mail relationship may be terminated if I repeatedly fail to adhere to these guidelines.

I understand and accept the risks associated with the use of unsecure E-mail communications. I further understand that, as with all means of electronic communication, there may be instances beyond the control of the family and the health care provider where information may be lost or inadvertently exposed, such as during technical failures, acts of God, acts of war, and so forth.

I understand that I have the right to revoke this authorization, in writing, at any time.

By signing this form I acknowledge the privacy risks associated with using E-mail and authorize health care providers to communicate with me or any minor dependent/ward for purpose of medical advice, education, and treatment.

(Date) SIGNATURE of Patient or Parent/Guardian RELATIONSHIP (if other than patient)
PATIENT IDENTIFICATION (For typed or written entries note: Name-last, first, middle initial;
hospital or medical facility) Patient's Name Sex
Year of Birth Relationship to Sponsor Component/Status

Depart/Service Sponsor's Name
Rank/Grade FMP-SSAN (Last four only)
Organization
MEDCOM FORM 756, DEC 2004 MC PE v1.02

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.