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WHITEPAPER:

HIPAA Compliant Analytics Options

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The Guidance

In December 2022, the Office for Civil Rights (OCR), which oversees HIPAA regulations, released new guidance shedding light on how to avoid sharing individually-identifiable personal health information with tracking platforms or technologies like Google Analytics, the Meta Pixel and more.

Many healthcare organizations are well aware of how HIPAA regulations impact their operational practices, but these guidelines and best practices can be overlooked by organizations big and small when it comes to their marketing.

This new guidance has created a lot of uncertainty for healthcare organizations, leading to some organizations deciding to remove Google Analytics from their marketing mix entirely and seek out new ways to preserve a data-based approach to marketing. In this whitepaper, we give an overview of the issues and the options available!

What's Google got to do with it?



What does HIPAA have to do with platforms like Google Analytics?

Anytime you view, collect or store data about patients or potential patients — connecting some form of "protected health information" to information that may indicate that person's medical conditions — you have a special responsibility to protect that information. This new guidance seems to indicate that an IP address or a user ID, two commonly-collected data points, may become PHI whenever they are paired with a specific website page where that individual is seeking out medical care.

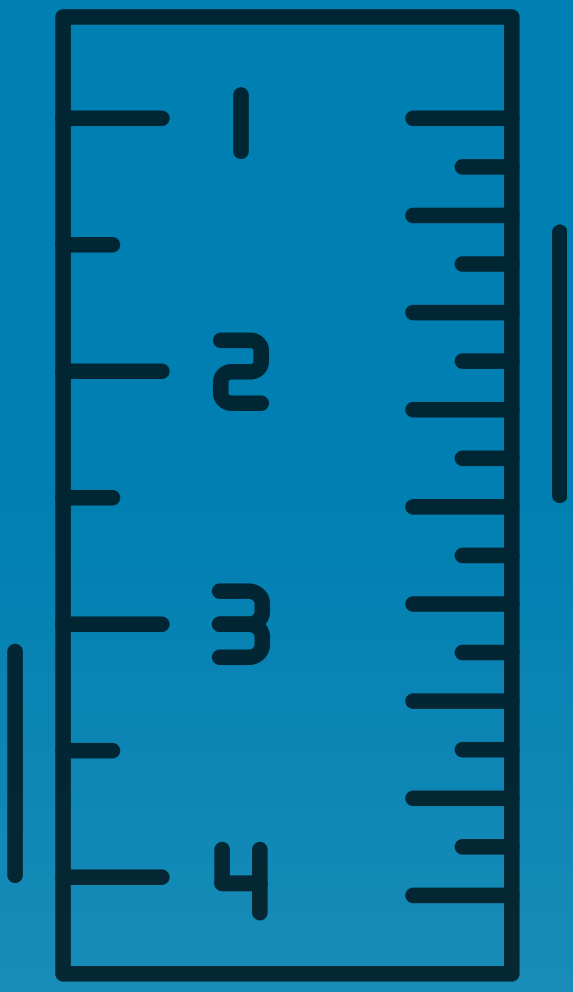
Does Google Analytics collect and store IP addresses or user IDs?

Google Analytics 4 does not collect or store IP addresses, but it does use IP addresses and user IDs to infer a user's general location and other details. That information is then stored in the platform alongside information like what page they viewed or what type of device they were using.

Can you get a BAA with Google or Meta or other online tracking platforms?

Google Analytics, Google Ads and Meta Ads do not offer a BAA at this time, nor do they purport to offer HIPAA compliance.

What should your organization do?



At this time, the question primarily depends on your organization's risk tolerance.

- **Conservative approach**

  If you want to make sure your website is air-tight, it's time to remove Google Analytics 4 and identify a new solution. You may also want to audit other technologies you are using on your website.

- **Middle of the road approach**

  Your organization may want to educate itself about the laws, audit its tracking technologies and take action on the areas of highest risk. You can take your time identifying and rolling out new platforms.

- **Least-concerned approach**

  If your organization has a higher risk tolerance or is less concerned, you may decide to update your privacy policy and keep an ear to the ground for updates.

Google Analytics 4 Alternatives



Server-side Google Tag Manager (GTM)

Swap out your Google Analytics 4 code with an upgraded code that transmits your data through a secure server controlled by your organization. Then send on the data to GA4, Google Ads, Meta Ads & more, but without IP address, user ID or other parameters included.

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HIPAA Compliant Analytics

Migrate to an entirely new analytics platform that will ensure HIPAA compliance and will sign a BAA. Some of these options include Piwik Pro, Mixpanel, Matomo, Heap & Adobe Analytics.

PIWIK PRO

Heap

mixpanel

Customer Data Platform

Sign an agreement with a Customer Data Platform (CDP), which will collect the data on your website, then send only the data you prefer on to other platforms, like GA4, Google Ads, Meta Ads & more.

Freshpaint



Product Comparison

Product	1 GA4	2 Piwik Pro	3 FreshPaint	4 Server-side GTM
Type of product	Analytics Tool	Analytics Tool	Customer Data Platform	Analytics Proxy
User-friendly	●●●●	●●●	●●●●	●●●●
Ease to implement	●●●	●●	●●●●	●●●
Prevent disruption to current processes	●●●●	●	●●●	●●●
Will sign a BAA	No	Yes	Yes	Yes
Pricing	Free	$$	$$$$	$ - $$

How Full Media Can Help

Full Media offers a high degree of expertise in privacy-first digital analytics and the ability to help consult your organization on the best way to maintain a data-driven approach to your marketing, while staying in line with the regulations.



Privacy-Focused Analytics Setup & Management

By default, Full Media sets up our client's accounts in a privacy-focused way. We will inform you of the different options and help keep you abreast of changes in industry standards or the law. If you decide to migrate to an alternative analytics platform or a CDP, we can also help!



Server-side GTM

Through our advanced healthcare digital analytics expertise and engineering skillset, we have a turnkey process to help implement server-side Google Tag Manager for your website. This option is often painted as excessively cumbersome from a technical standpoint, but it's actually pretty straightforward! We'll take care of the heavy lifting and you can feel more secure in your analytics.



Client Consulting

If your organization needs help interpreting the latest guidance and laws, communicating with attorneys or compliance directors, or determining the best option for you, we can help!



Informed by Attorneys

Full Media works with our own legal counsel in the healthcare data privacy space. This ensures that our approach is vetted and we can share whatever insights we have with you!

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Thank you.



For more information

+770.534.2515 ext. 303

rsauceman@fullmedia.com

www.fullmedia.com