### Way to Health Platform HIPAA/Privacy Documentation

### The purpose of this document is to describe how study data/PHI is managed with external partners by the Way to Health platform (described as “the platform”)

### Qualtrics

All studies are using online survey tool Qualtrics to collect answers to survey questions from participants. Survey answers are stored on the Qualtrics server before we retrieve them and save them on the platform. All interactions between a participant and the Qualtrics server are deidentified. Study staff members review the survey content to ensure that no questions in any of the surveys ask for patient identifiers. To ensure no patient identifiable data is stored by Qualtrics we use randomly generated 64 bit identifiers to link responses in Qualtrics to study events in our system. No PHI will ever be stored by our application in Qualtrics.

### MedApps

MedApps ( [http://medapps.com](http://medapps.com/)) biometric devices (e.g. scales, BP cuffs, glucometers) are being used in multiple studies being run on the Way to Health platform. Data collected by these devices are first transmitted to the MedApps server. We connect to MedApps with a secure certificate and retrieve the data with a unique participant serial number. All identifying information about the participant is encrypted on the MedApps server. MedApps is HIPAA compliant in its handling of PHI and a HIPAA Business Associate Agreement is in place.

### FitBit Pedometer

The FitBit is a pedometer designed for consumer use. When a participant receives the device, they create their own account on the FitBit website ( [http://fitbit.com](http://fitbit.com/)) which is where their pedometer/walking data will be collected. The participant must give some identifying information to the FitBit website to create an account (e.g. their full name and email address). The FitBit website also asks for various other health information such as height, weight and age. The FitBit website has its own detailed privacy policy available at <http://www.fitbit.com/privacy>.

Once a participant has a FitBit account, they authorize the Way to Health platform to access their FitBit data via an authentication protocol called OAuth

(<http://en.wikipedia.org/wiki/OAuth>). The platform collects their data over a secure connection, and makes it available to the Way to Health project via a secure connection.

### IncentaHealth Scale

The IncentaHealth scale is designed for use in studies and by large organizations who wish to improve the health of their employees. Participants weigh in at a centralized location and data is reported to IncentaHealth's secure servers, from which it is retrieved securely by the Way to Health platform. Data includes the participant's weight and a photo for verification. The participant logs in at the IncentaHealth scale with the same username and password they use to access the Way to Health platform site. A HIPAA Business Associate Agreement is in place.

### Respironics CPAP Machine

In order to be reequipped with a Phillips Respironics CPAP machine, a participant is first enrolled in a Phillips service called EncoreAnywhere ( [http://encoreanywhere.com](http://encoreanywhere.com/)). Like the FitBit pedometer, this service requires the entry of some identifying information about the participant. The privacy policy for EncoreAnywhere can be viewed at <http://rionline.respironics.com/hhs_privacy/>.

The CPAP machine reports data to EncoreAnywhere, after which it is provided to the Way to Health platform. The data is sent as an encrypted email attachment. Way to Health collects the email from the Penn email server (webmail.wharton.upenn.edu) via SSL and decrypts the file on the production server. No additional information about the participant is provided to EncoreAnywhere during this process.

### Vitality GlowCaps

Vitality’s GlowCaps measure adherence with prescription drug regimens (i.e. whether the drug was taken as prescribed). In most cases the data is deidentified and Vitality is provided only with a study ID and a "cap ID(s)" for each participant. However some projects may use additional GlowCap functionality in which case participant phone number, e-mail address and medication dosing schedule may be entered onto Vitality’s secure server. Data transfer from Vitality to Way to Health takes place via a secure connection (https). A HIPAA Business Associate Agreement is in place

### Messaging and Alerts

Most studies built on the platform employ some form of notifying participants and research coordinators either by email or text message. For text messaging, we use Twilio Cloud Communications ( [http://twilio.com](http://twilio.com/)). Twilio logs the contents of each message that passes through its system along with the phone number that the message was sent to. All messaging that could be distributed to participants through these channels is reviewed by study staff to ensure no PHI is included. If health information is to be communicated via text message (e.g. blood pressure readings), study staff will check off the following option in Way to Health, ‘Delete record of all text messages from Twilio servers?”. Once the message is received in the platform, the content will immediately be deleted from the Twilio servers.

### Quest Diagnostics

Quest Diagnostics is a clinical laboratory, licensed to perform laboratory testing under the Clinical Laboratory Improvement Amendments (CLIA) of 1988, and which performs testing in accordance with the CLIA regulations. The University of Pennsylvania and Quest Diagnostics has a services agreement in place that covers all studies using Quest Diagnostics Laboratory services. Quest Diagnostics laboratory data is linked to Way to Health in a similar manner as other external sources such as MedApps. Lab values are transferred using a secure link to a staging MySQL database running on the PMACS server. The Way to Health software has its own set of automated routines that incorporate these new data sets into the Way to Health platform.

**Nokia Scale and Blood Pressure device**

The Nokia scale and blood pressure device is designed for consumer use. When a participant receives the device, they download the application on a smartphone, which is where their weight and/or blood pressure data will be collected. Participants will then create their own account on the Nokia website (http://www.Nokia.com/en/api). The participant must give some identifying information to the Nokia website to create an account (e.g. their full name and email address). The Nokia website also asks for various other health information such as height, weight and age. The Nokia website has its own detailed privacy policy available at  http://www.Nokia.com/en/api.

Once a participant has a Nokia account, they authorize the Way to Health platform to access their weight data via an authentication protocol called OAuth

(<http://en.wikipedia.org/wiki/OAuth>). The platform collects their data over a secure connection, and makes it available to the Way to Health project via a secure connection.

**Moves Application**

Moves collects data from the participant’s phone to track movement. The participant downloads the application on their personal cell phone, which is where their walking data will be collected. The participant will also be given the option to create an account. In order to create an account, the participant must give some identifying information to the Moves application (e.g. email address and password). The Moves website has its own detailed privacy policy available at:

<http://moves-app.com/privacy>

Once a participant has a Moves account, they authorize the Way to Health platform to access their walking data via an authentication protocol called OAuth

(<http://en.wikipedia.org/wiki/OAuth>). The platform collects their data over a secure connection, and makes it available to the Way to Health project via a secure connection.

**MedSignals**

MedSignals’ pillbox measures adherence with prescription drug regimens (i.e. whether the drug was taken as prescribed). In all cases the data is deidentified and MedSignals is provided only with a study ID and a "device ID" for each participant. Data transfer from Vitality to Way to Health takes place via a secure connection (https).

**CleverCap**

CleverCap measures adherence with prescription drug regimens (i.e. whether the drug was taken as prescribed) and weight. In all cases the data is deidentified and CleverCap is provided only with a study ID and a "device ID" for each participant. Data transfer from CleverCap to Way to Health takes place via a secure connection (https). CleverCap is an approved vendor of the University of Pennsylvania.

**Adheretech**

The AdhereTech device measure adherence with prescription drug regimens (i.e. whether the drug was taken as prescribed). In all cases the data is de-identified and AdhereTech is provided only with a study ID and a "device ID(s)" for each participant. Data transfer from AdhereTech to Way to Health takes place via a secure connection (https).

**Misfit**

The Misfit is a pedometer designed for consumer use. When a participant receives the device, they create their own account on the Misfit website (http://misfit.com/) which is where their pedometer/walking data will be collected. The participant must give some identifying information to the Misfit website to create an account (e.g. their full name and email address). The Misfit website also asks for various other health information such as height, weight and age. The Misfit website has its own detailed privacy policy available at http://misfit.com/legal/privacy\_policy.

Once a participant has a Misfit account, they authorize the Way to Health platform to access their Misfit data via an authentication protocol called OAuth

(http://en.wikipedia.org/wiki/OAuth). The platform collects their data over a secure connection, and makes it available to the Way to Health project via a secure connection.

**Wisepill**

Wisepill medication adherence device measures adherence with prescription drug regimens (i.e. whether the drug was taken as prescribed). In all cases the data is de-identified and Wisepill will only be provided with a study ID and a "device ID" for each participant. Data transfer from Wisepill to Way to Health will take place via a secure connection (https).

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