

# Performed an Online Tracking Assessment?

OCR Mandate for HIPAA Compliance



## Objectives

- ✘ Identify 3rd-party resources across websites.
- ✘ Evaluate 3rd-party resources using fingerprinting or tracking technology.
- ✘ Establish actionable recommendations.
- ✘ Ensure HIPAA compliance with OCR guidance for online tracking.

## Online Tracking HIPAA Compliance

Regulated entities are not permitted to use tracking technologies in a manner that would result in impermissible disclosures of PHI to tracking technology vendors or any other violations of the HIPAA Rules.

OCR Guidance

## Project Scope

Crawl the in-scope websites to identify calls to 3rd-party resources.

Review 3rd-party resources to identify those implementing tracking or fingerprinting technologies.

Provide report on websites employing tracking or fingerprinting technologies, including identifying the specific 3rd-party resources on each crawled page potentially providing those features.

### The ecfirst HIPAA Ecosystem



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