Concussion Database System

Frequently Asked Privacy Questions for Patients

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1. Who should read this document?

Complete Concussion Management Inc. ("**CCMI**") has created this set of "frequently asked questions" to give patients and their families information about the services and safeguards CCMI employs with respect to our web-based EMR system called the CCMI Concussion Database System.

2. Who is Complete Concussion Management?

CCMI is a private organization. We analyze leading research to develop best-in-class approaches to concussion care. Our evidence-based training programs and integrated healthcare technologies empower multidisciplinary teams to implement standardized care for those impacted by concussions. Our network and CCMI Concussion Database System enables large-scale research to advance concussion management, and ultimately, the long-term health and well-being of concussion patients.

3. What is the CCMI Concussion Database System?

The CCMI Concussion Database System is a web-based Electronic Medical Record tool provided by CCMI to licensed healthcare providers (including clinics and the patient's family doctor, collectively "**Registered Care Providers**") specifically to assess and monitor patients' concussions and as a repository of patient health information.

The CCMI Concussion Database System also connects with a smartphone application ("**Concussion Tracker**") which allows patients to access some elements of their treatment plan, provide symptom severity updates to their associated Registered Care Providers, view their baseline testing results, and view other valuable resources about their care.

The Concussion Tracker also allows coaches, trainers, and teachers to report suspected concussion injuries directly to a patient's Registered Care Providers (including a patient's family doctor, if the family doctor is registered) as well as view permissions and restrictions for a given athlete/student so that all members within the circle of care remain on the same page.

In other words, the CCMI Concussion Database System and the related applications allows for the facilitation and communication of appropriate concussion care at all stages from pre-injury test results to injury reporting and post-injury assessment and care.

4. What type of information is collected via the CCMI Concussion Database System and for what purposes?

A Registered Care Provider collects your personal health information via the Concussion

Database System to create a profile, assess and track your recovery, and facilitate care. This information may include your name, health card number, symptoms you may be experiencing, the facility where you are being treated, and information about the health care provider assessing your symptoms.

You may also use the Concussion Tracker to enter information about the symptoms you are experiencing (e.g. my headache level is a "4" on a scale of 0 to 6). This information is primarily used by your Registered Care Providers to provide appropriate and timely care as well as track your recovery.

CCMI also collects this information to plan, manage, and improve concussion care within the CCMI program as well as conduct large research studies utilizing de-identified data.

5. Can I have access to my personal health information on the CCMI Database System?

Yes. Some information can be viewed through the Concussion Tracker smartphone application, however if you wish to have access to your entire file, please speak with your Registered Care Provider. While we cannot grant user-level access to the secure system, the Registered Care Provider can themselves grant you access, according to applicable privacy laws, by printing off the entirety of the file (note: fees may apply for printing the file). If you have no associated Registered Care Provider for any reason and wish to access your entire file, please contact CCMI's privacy officer.

6. Who accesses my personal health information and for what purpose?

There are three ways your personal health information may be accessed:
    a) by Registered Care Providers for the purposes of providing health care to you;
    b) by you, via the Concussion Tracker smartphone application;
    c) by select coaches, trainers, and/or teachers you choose to allow access (and access is only to limited information, via the Concussion Tracker smartphone application); and
    d) by a limited number of CCMI technical support staff, but only if such access is necessary to provide a particular instance of technical support.

Registered Care Providers involved in your care can access your personal health information in the CCMI Concussion Database System through a secure website and are only permitted to access information about patients they are treating. You facilitate that access by providing a Registered Care Provider with your account number and Concussion ID Card Number. This means that a health care provider who is not part of your healthcare team cannot view your record.

You may change your Registered Care Providers by attending another certified CCMI clinic. By providing a new CCMI clinic access to your file, this will you remove your previous care provider from your health care team, this means that they will no longer have access to any new information added to your EMR by other Registered Care Providers or by you. They will continue to have access to information in your EMR

prior to that change – as health care providers are under professional obligations to maintain medical records, and the CCMI Concussion Management Database provides record retention services to Registered Care Providers (in addition to providing the Concussion Tracker application to you).

The Concussion Tracker allows you as the patient to view certain information (i.e., baseline testing results, recovery stage, permissions and activity restrictions, etc.), and provide daily updates on symptom severity to your healthcare provider. The Concussion Tracker also allows coaches, trainers, and teachers whom you wish to allow access, the ability to report suspected injuries to your Registered Care Providers as well as follow up on your recovery progress (i.e., view recovery stage, permissions and activity restrictions). Only those coaches, trainers, and teachers who you provide direct access via the Concussion Tracker will be able to view this information. You can add or remove access to any of these people at any time.

CCMI as well as third-party technical support staff have access to the CCMI Concussion Database System in order to provide information technology support and to extract information to plan, manage, and improve services within the CCMI program. Researchers may also be granted access for the purpose of conducting research with de-identified aggregate data.

7. How is my personal health information protected by CCMI?

Your personal health information in the CCMI Concussion Database System is protected by administrative, technical, and physical safeguards.

- **Administrative Safeguards** – CCMI sets out the privacy practices that organization follows in its Privacy Policy located at completeconcussions.com/privacy. CCMI staff and third-party service providers must read and agree to adhere to those policies, as applicable. CCMI also provides privacy training sessions, which all staff must attend. Staff, third party service providers and Registered Care Providers sign agreements with CCMI verifying their understanding of their duties in protecting your personal health information and their pledge to adhere to CCMI's privacy practices.
- **Technical Safeguards** – Access to the CCMI Concussion Database System is protected by authentication and authorization mechanisms (usernames and passwords), network security controls and a monitoring system known as the CCMI Logging Monitoring and Auditing System, which tracks all access to and transfers of private health information throughout the system.
- **Physical Safeguards** – The data centre where the servers that support the CCMI Concussion Database System are housed is protected by various means which include:
    - access to doors and elevators are controlled through an entry point management system which requires entrants to have a security issued accessed card;

- o the facility is manned by security guards (24 hours a day, 7 days a week);
- o any personnel that access the data centre are required to undergo a personal security clearance/background checks prior to being granted approval to work on site; and
- o the location is monitored by video surveillance.

8. How can I help protect the personal health information in the CCMI Concussion Database System?

There are a number of additional ways that you can protect your personal health information when you use the CCMI Concussion Database System:
- Keep your Account number and Concussion ID Card Number confidential and secure
- Always log out of your Concussion Tracker when you are done
- Contact CCMI's Privacy Office to report any suspicious activity regarding your account, or if you suspect that the confidentiality and security of your account number or Concussion ID Card Number have been compromised

9. Are there any additional polices or information I can read about CCMI's handling of my personal health information?

Yes, you can read the following polices or guidelines which we provide to all participating clinics, physicians and specialists:

- CCMI HINP Privacy Policy
- HINP FAQs (This document)
- CCMI General Privacy Policy

10. Who can I speak to if I have questions about the privacy or security of the CCMI Concussion Database System?

If you have questions about the privacy or security of CCMI's Concussion Database System, please complete our Privacy Inquiries Form and send it to the CCMI Privacy Office:

Mail: Privacy Officer
Complete Concussion Management Inc,
2655 Bristol Circle
Oakville, Ontario, Canada
L6H 7W1

Email: privacy@completeconcussions.com