



How To Read Your Web Tracker Report

Learn how to use Freshpaint's Web Tracker Manager to monitor and manage risky web trackers on your website. This will help you maintain HIPAA compliance and ensure your healthcare website protects patient information.



Third-party web trackers are at the heart of HHS's guidance about online tracking technologies. Web trackers, like the Google Analytics tracker, are installed on many healthcare websites and automatically collect protected health information (PHI) from your website visitors.

Unfortunately, there is no easy way to find and remove these trackers. As Baptist Health's Lauren Anderson says, "People don't realize it's not just a button that you can turn off to get these trackers off your site."



That's why Freshpaint built Web Tracker Manager. It helps you monitor and manage third-party trackers installed on your website so you can quickly make decisions that keep you HIPAA-compliant.

How It Works

Web Tracker Manager scans your entire website, starting from the home page and following links to explore from there. It explores all pages on your website, including subdomains, but excluding patient portals. For example, Web Tracker Manager will follow a link from example.com to my.example.com.

When Web Tracker Manager visits a page on your website, it waits for the third-party web trackers to load. Once loaded, it logs all web trackers and assigns a risk level based on if the tool collects PHI.

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Tracking tool	Pages detected	Risk	First detected	
Google Analytics	6	HIGH RISK	11/1/2023	\rightarrow
YouTube	5	HIGH RISK	11/1/2023	\rightarrow
Google Fonts	127	LOW RISK	11/1/2023	\rightarrow
Google Tag Manage	r 127	LOW RISK	11/1/2023	\rightarrow
graph.facebook.con	n 84	UNKNOWN RISK	11/1/2023	\rightarrow
pixel.wp.com	127	UNKNOWN RISK	11/1/2023	\rightarrow

Freshpaint automatically sends its customers a report every week that lists any new web trackers added to their website during that week.



How To Read Your Web Tracker Manager Report

Your report comes in a spreadsheet with several tabs and columns.

The first tab you'll see is the overview tab. This tab shows the total number of web trackers on your site, arranged from highest to lowest risk.

Risk Level	First Detected	Last Detected	Category	Name	Example Domain	Description
high	2024-04-02	2024-04-02	advertising / social media	Facebook	www.facebook.com	This is either the Facebook Pixel or an embedded Facebook Post. Facebook Pixel is high risk because it captures what pages a user visits along with the user's IP address. Embedding a facebook post on your site can be high risk if the post contains health information.
high	2024-04-02	2024-04-02	analytics	Google Analytics	www.google-analytics.com	Google Analytics captures what pages a user visits along with the user's IP address
medium	2024-04-02	2024-04-02	analytics	Siteimprove Analytics	site improve analytics.com	Siteimprove Analytics captures what pages a user visits along with the user's IP address
medium	2024-04-02	2024-04-02	developer tooling	New Relic	js-agent.newrelic.com	New Relic can be HIPAA compliant if a BAA is signed. Confirm whether your organization has a BAA with New Relic
low	2024-04-02	2024-04-02	developer tooling	Adobe Fonts	use.typekit.net	Adobe Fonts does not collect PHI
low	2024-04-02	2024-04-02	tag management	Google Tag Manager	www.googletagmanager.com	Google Tag Manager captures only IP address and no other information

Freshpaint bases the risk level on its database of web trackers known to collect PHI from website visitors. <u>Google Analytics</u>, for example, is rated as high-risk because, in its basic configuration, the tool is known to collect PHI from website visitors.

Moving left to right on the Overview tab, you'll see columns labeled **First Detected** and **Last Detected**. These columns will help you understand when a tracker was identified and whether it is still a risk on your website. If you think you removed the Google Analytics tracker from your website, but it's still showing a last detected date of today, you'll have the confidence to know the risk is not resolved and the tracker is still on your website.

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high	2024-04-02	2024-04-02	analytics	Google Analytics	www.google-analytics.com	Google Analytics captures what pages a user visits along with the user's IP address
medium	2024-04-02	2024-04-02	analytics	Siteimprove Analytics	site improve analytics.com	Siteimprove Analytics captures what pages a user visits along with the user's IP address
medium	2024-04-02	2024-04-02	developer tooling	New Relic	js-agent.newrelic.com	New Relic can be HIPAA compliant if a BAA is signed. Confirm whether your organization has a BAA with New Relic
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The **Category** column gives you direction on who in your organization you might ask for help finding the tracker. Look at the New Relic tracker as one example. It's a medium-risk tracker. If your organization has signed a <u>Business Associate Agreement</u> (BAA) with New Relic, it's low risk. But if you're unsure, you can use the category column to see that it's a developer tool – meaning it's most likely installed by someone on your IT or development team. From there, you can contact your IT, or development department, to find out if a BAA has been signed.

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The next two columns, **Name** and **Example Domain** will help you identify the tracker. Name is the common name used for each tracker, while Example Domain is the actual domain used in the tracker snippet that is installed on your website. Some trackers, like Facebook, might have multiple domains used for tracking. Web Tracker Manager will catch all of those.

The last column on this spreadsheet is **Description**. This description of each tracker comes from Freshpaint's Web Tracker Manager database to help users understand what kind of data each tracker collects.

Risk Level	First Detected	Last Detected	Category	Name	Example Domain	Description
						This is either the Facebook Pixel or an embedded Facebook Post. Facebook Pixel is high risk because it captures what pages a user visits along with the user's IP address. Embedding a facebook post on
high	2024-04-02	2024-04-02	advertising / social media	Facebook	www.facebook.com	your site can be high risk if the post contains health information.
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medium	2024-04-02	2024-04-02	analytics	Siteimprove Analytics	site improve analytics.com	the user's IP address
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Moving on to the other tabs on the spreadsheet, you'll notice tabs labeled with the names of web trackers.



Each of these tabs contains a list of all the pages each tracker is installed on. These tabs will help you ensure that all risky trackers have been removed from all pages on your website.

If you click into any of these tabs, you'll see three columns: **Page Title**, **Page URL**, **Tracker URL**. Page Title exapls in the page on your website where the tracker was found. The Page URL column gives you the URL of the page on your website where the tracker was found. Finally, the Tracker URL column will help you find that tracker in the source code of each individual page on your website where the tracker was found.

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Page Title	Page URL	Tracker URL
Example University School of Medicine	https://medicine.example.com/	https://connect.facebook.net/en_US/fbevents.js
		https://www.facebook.com/tr/?id=772204360383608&ev=PageView&dl=https%
		7A%2F%2Fmedicine.example.com%2F&rl=&if=false&ts=2812079026733&sw=60
		0&sh=400&v=2.2.151&r=stable&ec=0&o=4126&fbp=fb.1.1692076026731.14200
Example University School of Medicine	https://medicine.example.com/	9159&cs_est=true&ler=empty⁢=177076026619&coo=false&rqm=GET
		https://www.facebook.com/tr/?id=772201260383608&ev=PageView&dl=https%
		4A%2F%2Fmedicine.example.com%2help%2getting-treatment&rl=&if=false&ts=
		1712079063876&sw=400&sh=300&v=2.6.151&r=stable&ec=0&o=4196&fbp=fb.
Getting Treatment Example University	https://medicine.example.com/help	1.1712096026731.163409159&cs_est=true&ler=empty⁢=1712076263792&coo
School of Medicine	/getting-treatment	=false&rgm=GET

Together, these tabs on your Web Tracker Manager spreadsheet will help you identify and remove risky trackers from your website.

What To Do After Finding Risky Trackers

Once Web Tracker Manager identifies risky trackers, you have three action options:

- 1. Put a **Business Associate Agreement** (BAA) in place with the risky web tracker. BAAs are legal documents that outline how the tracker will securely handle and protect PHI in compliance with privacy laws. Work with your legal and compliance team to get this in place.
- If you cannot get a BAA, which is often the case with analytics and ad platforms, use <u>an HHS-approved tool like Freshpaint</u> to replace risky trackers. This way, you control data flow and stop PHI from reaching them.
- 3. If you cannot get a BAA and cannot govern the flow of PHI, work with IT and any other relevant partners to remove the tracker from your website.

Managing third-party web trackers on healthcare websites is critical to maintaining HIPAA compliance and protecting patient information. Freshpaint's Web Tracker Manager offers a proactive solution by identifying and assessing the risk of web trackers.

Book a demo of Freshpaint's Healthcare Privacy Platform, which includes Web Tracker Manager, by <u>clicking here</u>.

