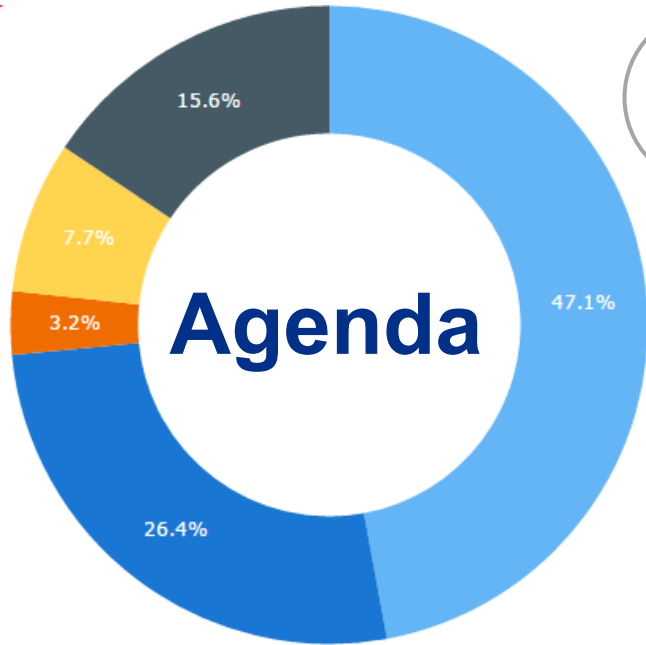**Breaking up with Google**

The Good, The Bad & The Not So Ugly

Denise Davis, Interim Vice President, Marketing, Emory Healthcare

Allyzon Zahorcak, Vice President, MarTech, Unlock Health

This is Us

Denise Davis
Interim VP, Marketing
Emory Healthcare

"My real title is Chief Marketing Mechanic, and I believe I was born for this. I have 30+ years of mass communications experience in several industries outside of healthcare. At Emory I've been steadily modernizing our tech stack – a project I fondly refer to as 'chipping my way out of Alcatraz with a plastic spoon.' This presentation details one of my chipping sessions."

This is Us

Denise Davis
Corp. Director, Mktg Tech & Ops
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Allyzon Zahorcak
Vice President, MarTech
Unlock Health

"I'm a marketing technology expert with over 10 years of experience in developing and marketing SaaS and health tech products. At Unlock Health, I lead web strategy, CRM, and data intelligence, driving solutions that enhance patient engagement and optimize digital marketing strategies. My team works hand-in-hand with product, development, and compliance teams to support health systems in their growth."

Three Key Take-Aways

Google alternatives are achievable and can be affordable

Navigating internal stakeholders & how to build relationships

Roadmap for acquisition, migration & implementation

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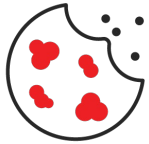# The Online Landscape: Then & Now

- Guidelines, law, and class action suits
- AHA lawsuit against HHS
- Google's anti-trust suits

Changes in data strategy

Regulatory Compliance
Opt-outs and OCR Guidance are impacting tools for customer insight and activation.
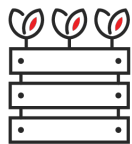
Third-Party Cookies Crumbling
The 'go to' means of data collection and tracking are in some cases fully lost to marketers.

Ad Blocking, Mobile & Browser Changes
ITP 2.x, IDFA, Google's same-site cookies, ad blockers, and more has reduced insight and data fidelity.
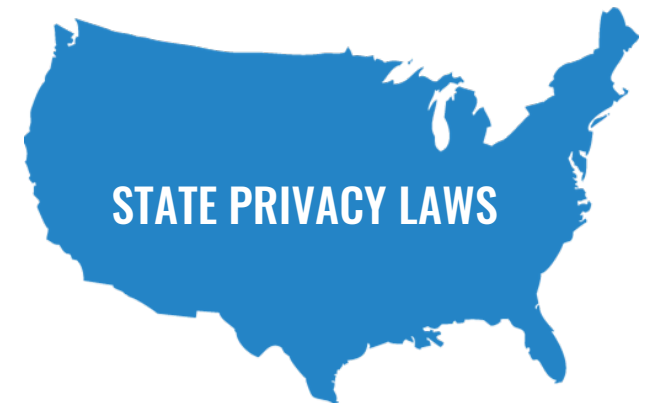
Walled Garden Expansion
Advertisers spend where the highest return is, and publishers want to maximize the yield of their traffic.

A change in privacy regulations

While nothing new in healthcare marketing, privacy and data security compliance has become a challenge in many healthcare marketing plans.

There are 18 identifiers considered Personal Health Information under HIPAA

HIPAA

- Names
- Dates, except year
- Telephone numbers
- Geographic data
- FAX numbers
- Social Security numbers
- Email addresses
- Medical record numbers
- Account numbers

- Health plan beneficiary numbers
- Certificate/license numbers
- Vehicle identifiers and serial numbers including license plates
- Web URLs
- Device identifiers and serial numbers
- Internet protocol addresses
- Full face photos and comparable images
- Biometric identifiers (i.e., retinal scan, fingerprints)
- Any unique identifying number or code

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Pixel Hunt

Facebook Is Receiving Sensitive Medical Information from Hospital Websites

June 16, 2022 06:00 ET
Updated July 19, 2023 09:29 ET

Anson Chan

Experts say some hospitals' use of an ad tracking tool may violate a federal law protecting health information
By Todd Feathers, Simon Fondrie-Teitler, Angie Waller, and Surya Mattu

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STAT

A tracking tool installed on many hospitals' websites has been collecting patients' sensitive health information—including details about their medical conditions, prescriptions, and doctor's appointments—and sending it to Facebook.

See our data here.

GitHub

The Markup tested the websites of Newsweek's top 100 hospitals in America. On 33 of them we found the tracker, called the Meta Pixel, sending Facebook a packet of data whenever a person clicked a button to schedule a doctor's appointment. The data is connected to an IP address — an identifier that's like

The article that launched 1,000 questions
June 16, 2022

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And then the other shoe …

Released Dec. 1, 2022

Myths & Misconceptions #1

The Online Tracking Technology Guidelines called for a total stop of online tracking

Actually:

Establishing a BAA with a tracking technology vendor that meets the definition of a "business associate" provides an accepted level of compliance.
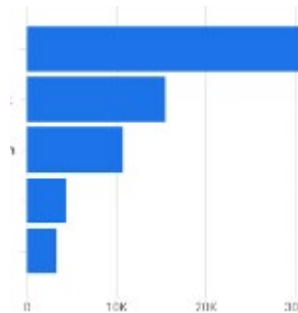
There is **nothing in HIPAA that prohibits the use of these tracking technologies**, but the HIPAA Rules apply when third-party tracking technologies are used, if the tracking technology collects individually identifiable information that is protected under HIPAA and if it transmits that information to a third party, be that the vendor of the tracking technology or any other third-party.

— The HIPAA Journal, Dec. 2, 2022

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Poll Question #1

When the OCR/HHS Guidelines for Online Tracking Technology dropped, what was your health system's reaction:

● Rip it out!! Rip it all out!

● Can't we rip some of it out?

● Kind of nervous, but let's ride this out

● So [Marketing Person], what's the sitch?

● We're good. Our Google solution is compliant.

The Now: Latest Ruling on HHS Web Tracking Technology

On June 20, a federal judge in Texas ruled that the guidance issued by the HHS' Office for Civil Rights on website tracking technologies was unlawful and vacated the guidance, ruling that OCR overstepped its authority.

Overview:

- This ruling invalidates OCR's guidance that collecting a **visitor's IP address** on a hospital's **unauthenticated** web page might result in a PHI disclosure that violates HIPAA.

- **The rest of OCR's tracking technology guidance remains intact** - the Court's analysis concerns _only_ the Proscribed Combination and the Revised Bulletin's attempt to apply HIPAA obligations to the new IIHI context.

- When the visitor's intent is known (i.e. information regarding the user's past, present or future condition, treatment or payment for treatment), care should be taken to continue to treat the data as PHI.

Update:

- **On August 19, the OCR filed a notice of appeal.** Unless a stay of the ruling is granted, the June 20 ruling will remain in place until the appeal is resolved.

Sources:
https://www.aha.org/news/news/2024-06-20-judge-rules-favor-aha-vacating-hhs-online-tracking-bulletin-unlawful-and-beyond-agency-authority
https://www.aha.org/system/files/media/file/2024/06/opinion-order-in-aha-et-al-v-xavier-becerra-et-al-6-20-2024.pdf
https://www.bankinfosecurity.com/court-hhs-overstepped-hipaa-authority-in-web-tracking-guide-a-25596

Judge rules in favor of AHA vacating HHS online tracking 'bulletin' as unlawful and beyond agency authority

Proscribed Combination:
Circumstances where an online technology connects:

(1) An individual's IP address _with_
(2) A visit to an Unauthenticated Public Webpage (UPW) addressing specific health conditions or healthcare providers

In 2024…

Legend:
- **Additional provisions** (green)
- **Signed** (light orange)
- **In committee** (orange)
- **In cross committee** (yellow)
- **Passed** (light green)
- **No bills introduced** (gray)
- **Introduced** (purple)
- **Inactive bills** (dark gray)
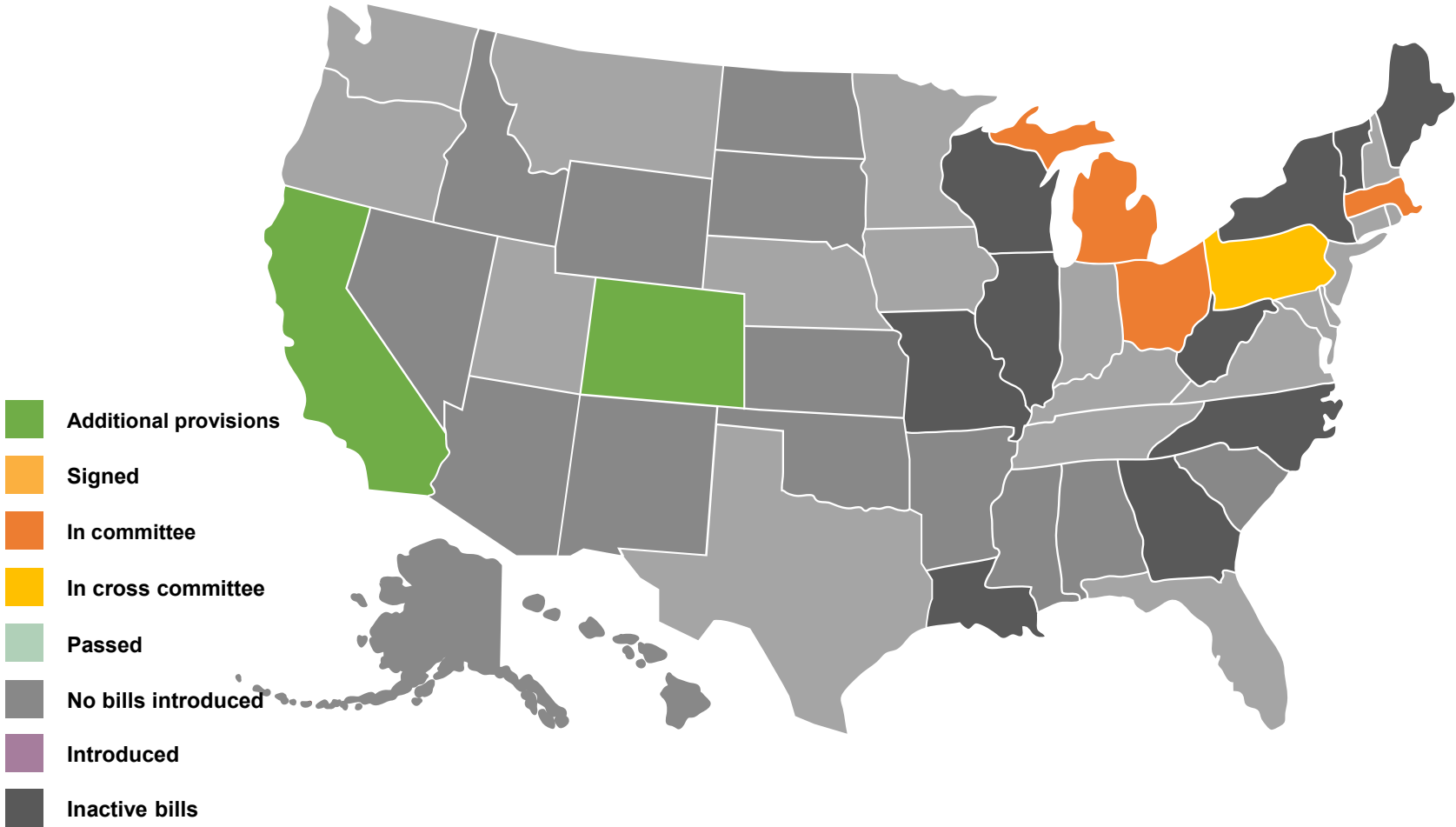
State	Effective
California*	29 Mar 2024
Colorado*	1 Jul 2024
Florida	1 Jul 2024
Montana	1 Oct 2024
Nevada	31 Mar 2024
Oregon	1 Jul 2024
Texas	1 Jul 2024
Washington	31 Mar 2024
Delaware	1 Jan 2025
Indiana	1 Jan 2026
Iowa	1 Jan 2025
Tennessee	1 Jul 2025
New Jersey	15 Jan 2025
New Hampshire	1 Jan 2025
Kentucky	1 Jan 2026
Maryland	1 Oct 2025
Minnesota	31 Jul 2025
Nebraska	1 Jan 2025
Rhode Island	1 Jan 2026

Federal timeline and overview

OCTOBER 2023	**Office for Civil Rights (OCR) Resource for Patients on Telehealth, Privacy, PHI**	Shared guidance to help patients understand their privacy and security risks when using telehealth services and ways to reduce risk through two resource documents
NOVEMBER 2023	**American Hospital Association (AHA) Sues Federal Government**	AHA leads the charge with Texas Hospital Association & other health systems to sue the government on recent guidance
DECEMBER 2023	**HHS Concept Paper**	The HHS released a concept paper outlining four major steps the department will take to advance healthcare cyber resiliency in 2024
	FTC Proposed Updates to COPPA	Would strengthen the current COPAA rule to further protect children's data
JANUARY 2024	**HHS Releases Voluntary Performance Goals for Cybersecurity**	Released voluntary health care specific cybersecurity performance goals (CPGs) and a new website to help health orgs implement best practices
MARCH 2024	**OCR Bulletin Update**	The OCR released revised guidance and provided clarifying examples on the disclosure of PHI; no net new changes
	FTC Releases 2023 Privacy & Data Update	FTC outlined the action it has taken action to address privacy and security threats areas such as AI, Health Privacy, Children's Privacy and Geolocation Data
APRIL 2024	**Proposal for American Privacy Rights Act (APRA)**	Proposal for Federal privacy law; this would preempt many (though not all) of the nearly 20 state consumer privacy laws
	American Hospital Association (AHA) Statement on 2025 Budget	The AHA stated its concerns for potential penalties for entities that do not meet cybersecurity standards outlined by the Biden administration's 2025 budget
JUNE 2024	**Federal court invalidates key part of HHS OCR Bulletin on AHA case**	Ruling invalidates OCR's guidance that collecting a visitor's IP address on an unauthenticated webpage violates HIPAA
AUGUST 2024	**OCR appeals Federal ruling on AHA case**	OCR filed an appeal on the June 20th ruling

Unlock

Partnerships with Legal and IT

It's not always what you know…

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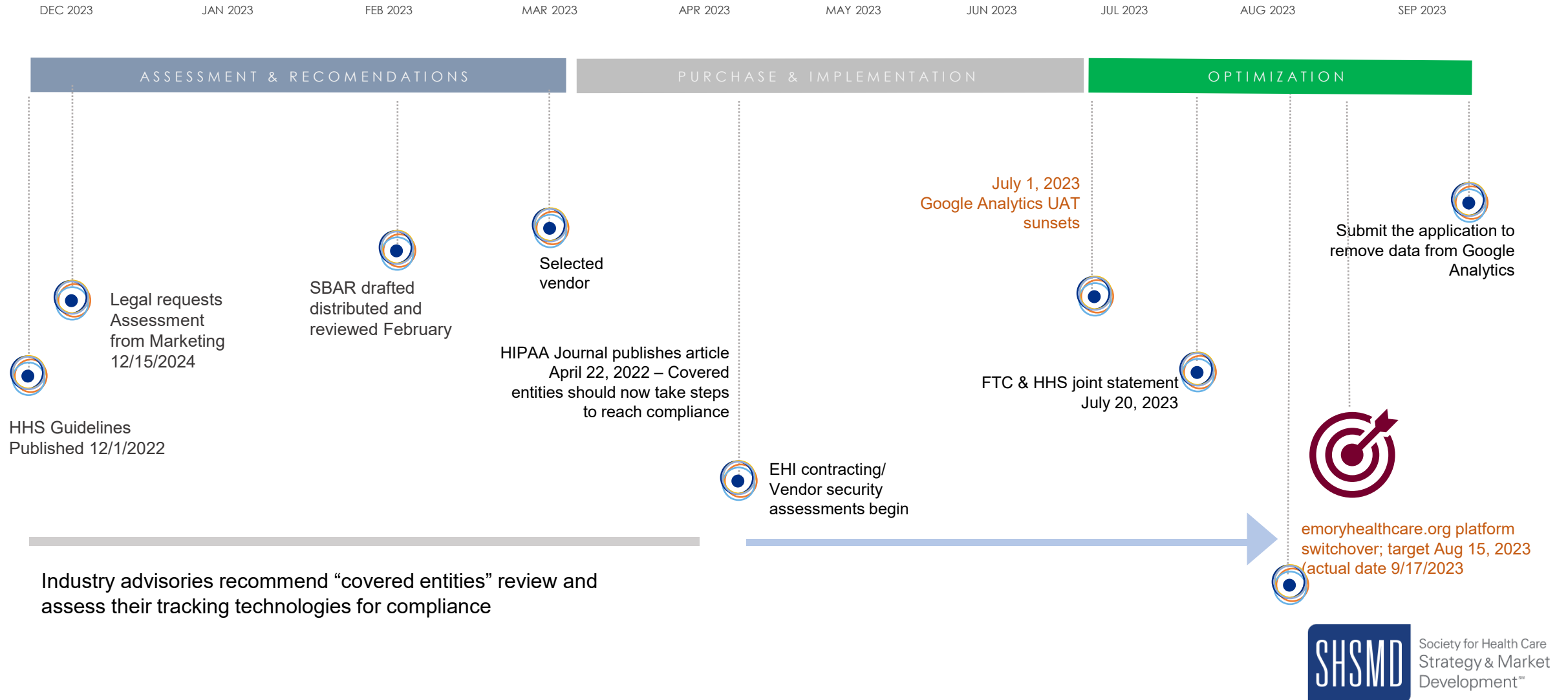
When marketing gets invited to a meeting with legal

What set the stage for us

A long (positive) history working with legal, compliance, and IT Security

- Data breaches
- Branding
- Copyright infringement (stock photography & fonts)
- MSA & BAA reviews
- Security reviews
- Governance & Guidelines

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Emory Healthcare's Timeline for Legal

DEC 2023   JAN 2023   FEB 2023   MAR 2023   APR 2023   MAY 2023   JUN 2023   JUL 2023   AUG 2023   SEP 2023

ASSESSMENT & RECOMENDATIONS | **PURCHASE & IMPLEMENTATION** | **OPTIMIZATION**

July 1, 2023
Google Analytics UAT sunsets

Selected vendor

Submit the application to remove data from Google Analytics

Legal requests Assessment from Marketing 12/15/2024

SBAR drafted distributed and reviewed February

HIPAA Journal publishes article April 22, 2022 – Covered entities should now take steps to reach compliance

FTC & HHS joint statement July 20, 2023

HHS Guidelines Published 12/1/2022

EHI contracting/ Vendor security assessments begin

emoryhealthcare.org platform switchover; target Aug 15, 2023 (actual date 9/17/2023

Industry advisories recommend "covered entities" review and assess their tracking technologies for compliance

Emory Healthcare's Audit

CRM PLATFORM

salesforce marketing cloud
salesforce health cloud
salesforce datorama
formstack
CallRail
Blackthorn

OTHERS

KYRUUS
gSight

HIPAA Compliant • Signed BAAs • Security Reviews Complete

Our Vulnerability Identified

- Will not sign BAAs
- Not HIPAA-compliant

Applies to all websites related to Emory Healthcare:
- Advancingyourhealth.org
- Winship
- AAE Development
- AAG
- Could affect WHSC (physician faculty pages)
- Emory Eye Center & Emory News Center as well, and any rogue sites

Poll Question #2

Grade your relationship with Compliance, IT & Security

A   B   C   D   F

How many people feel confident that their stack is well-papered and covered?

Choosing the Alternative

The why and the what behind our solution choice

Our Evaluation Criteria

Cost

Ease
of use

Ease of
implementation
and support

Feature Set

Customer
Reviews

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Our Evaluation Criteria

Cost

Ease
of use

Ease of
implementation
and support

Feature Set

Customer
Reviews

Robust
Security

UA > GA4 > Broader interest in alternatives

Additional web articles:

- **SEM Rush:** 15 Best Google Analytics Alternatives for 2023

- **Search Engine Land:** 15 Google Analytics 4 alternatives: Free and low-cost options

Server-side tagging helps

Client-side tagging
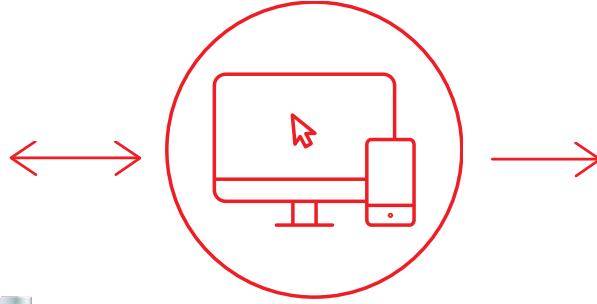
Example Data sent:
- Page path: /page
- User agent: Chrome
- Location: Los Angeles, CA
- Visitor ID: 34567
- User Email: larry.ricketts@gmail.com
- Phone: 323 425 0987
- Schedule ID: 678910
- SL: Ortho

A **server-side** implementation places a server in between the browser and vendor platform. The server intercepts data from the browser, modifies it to remove PHI, and then forwards the resulting clean data. This model allows for **control over data security** while also increasing site performance and reducing the impact of ad blockers.

Server-side tagging
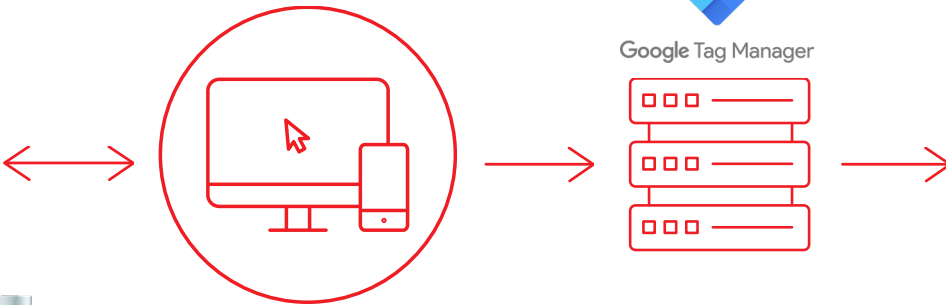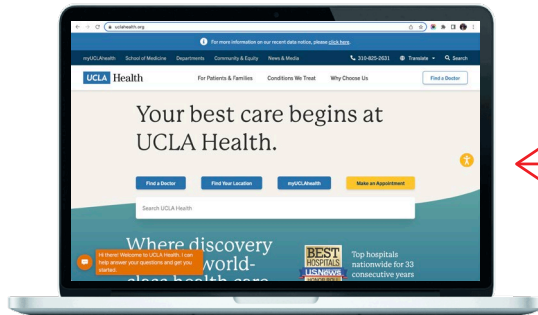
Google Tag Manager

Tagging server forwards data but removes:
- Page path: /page
- User agent: Chrome
- Location: Los Angeles, CA
- Visitor ID: 34567
- ~~User Email: larry.ricketts@gmail.com~~
- ~~Phone: 323 425 0987~~
- Schedule ID: 678910
- SL: Ortho

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… But isn't a standalone solve

You need to ensure your solution checks security, legal, and compliance checkboxes. A server-side platform itself is not an analytics product, rather a method to ensure you do not send PHI to your analytics stack.

Analytics stack is a term to describe the entire collection of products used when collecting and analyzing website data. It is typically comprised of a server-side platform (optional), a tag manger, and a reporting platform. Products are often bundled together, but you can mix and match. For example, an all-Google analytics stack could be GCP, GTM, GA4 and Looker.

Alternatively, a mixed stack of Tealium server-side, Tealium iQ Tag Manager, and PIWIK Pro and Tableau could also be viable.

Why bend over backward to limit what you can track just so you can continue with GA?

Server-Side Tagging: A Partial Fix	Sampling and Incomplete Data	You Don't Own Your Data
•GA4's server-side tagging gives you more control over how data is collected, but it's not a complete solution. It still sends some data back to Google, meaning privacy issues remain. •This setup might help avoid cookie issues and ad blockers, but it doesn't fully solve the privacy concerns we face in healthcare.	GA4 sometimes only analyzes a portion of your data instead of the full dataset. In healthcare, where details matter, this can lead to wrong conclusions about patient behavior.	Even with server-side, Google still has access to some of your data. In healthcare, we need full ownership and control over every bit of patient data for security and legal reasons.

So, what did we choose?

Without naming names…

- HIPAA & GDPR Compliant
- Dedicated Azure hosted (US East Coast)
- Pricing based on the number of events per month
- Digestible price tag
- Unlimited sites
- Unlimited users (flexible permissions)
- Onboard heat mapping
- Onboard consent manager
- Onboard tag manager (to replace GTM)
- Built-in video analytics
- Feels very similar to Google UAT
- Reports & Dashes – easy to build
- Allowed us to maintain same UTM format
- Google Ad Words & Google Console integration

Poll Question #3: What have you done so far?

What measures has your health system taken to mitigate online tracking exposure?

- Not much / still deciding

- Implemented CDP and/ or consent management

- Limited use of third-party tracking scripts and minimized data collection from web visitors

- Auditing and planning

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Implementation and Transition

- Interim measures
- Contracting & BAA
- Security Review
- Transition Planning & Backup
- Tagging & Events Migration
- Turning it On

Interim measures (pre-switch)

MEASURE	DIFFICULTY LEVEL	NOTES
Anonymize IP addresses in Google Analytics	●	Completed Jan. 2023. IP addresses one type of PHI specifically called out.
Set web pages with forms and thank you pages to noindex/nofollow	● ● ●	Completed May 2023
Remove Google Tag Manager event tracking from form submit buttons	● ●	Completed April 2023
Halt heat mapping software	●	Completed March 2023
Revise Web Privacy Policy	● ●	In progress. Drafted. Requires legal review.
Confirmed BAAs on other tracking technologies	● ●	Completed March 2023
Remove embedded YouTube videos	● ● ●	May 2023

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Additional security measures, cont'd

MEASURE	STATUS	NOTES
Educate Emory Healthcare and Emory University engaged in supporting EHC functions on risks, changes & updates.	●●●	In progress. Additional meetings to be scheduled through summer.
Continued vendor and agency compliance reviews	●●●	Completed April 2023
Develop governance documents with bi-annual reviews.	●●●	Target date for draft Sept 2023
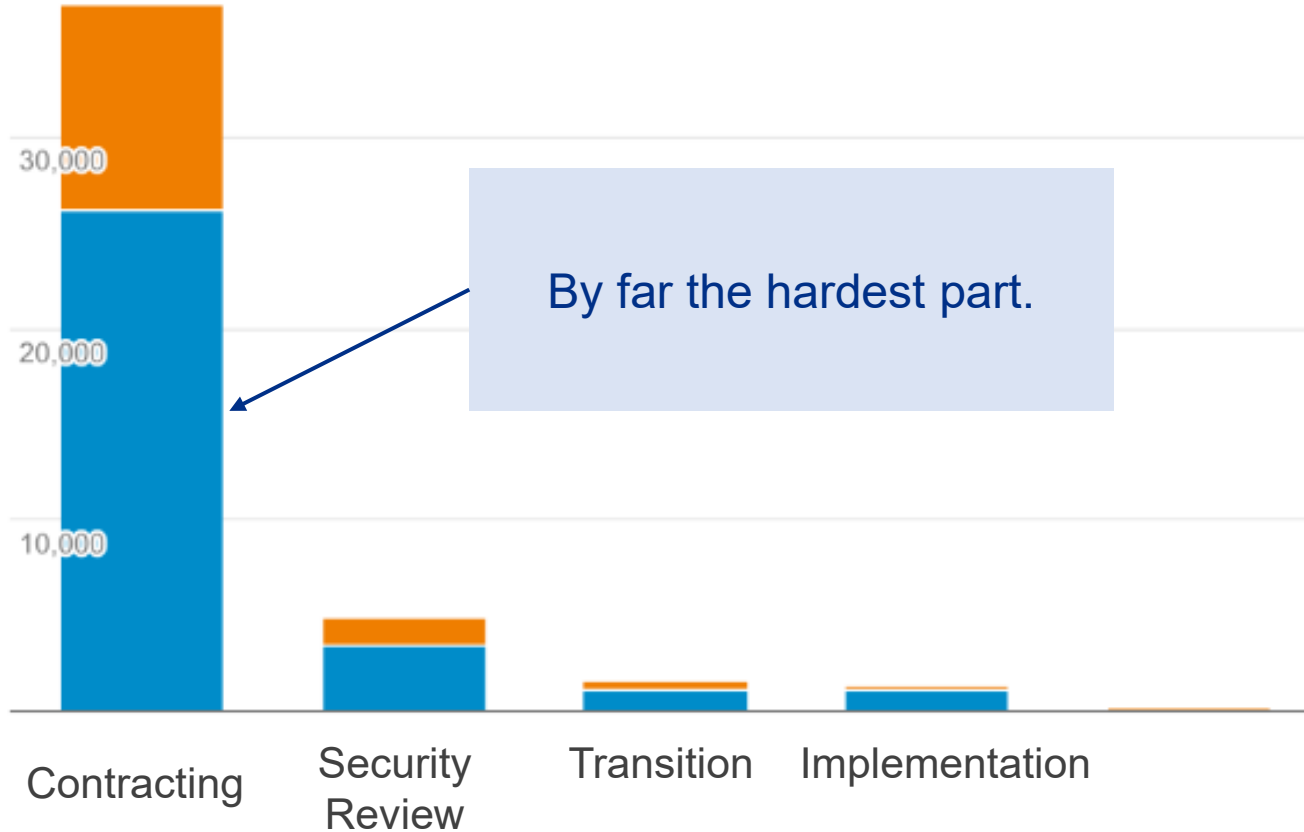
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Contracting and BAA Approval

By far the hardest part.

- Contracting
- Security Review
- Transition
- Implementation

- Natural timeline of software contracting

  +

  - Offshore vendor
  - Offshore vendor that likely saw the biggest single quarter sales spike in their existence
  - Some of the contract language took a while to reach joint approval
  - Started the purchasing process during a website re-platform and migration project

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Contracting and BAA Approval

By far the hardest part of our conversion.

30,000

20,000

10,000

Contracting   Security Review   Transition   Implementation

- Natural timeline of software contracting

+

- Offshore vendor
- Offshore vendor that likely saw the biggest single quarter sales spike in their existence
- Some of the contract language took a while to reach joint approval
- Started the purchasing process during a website re-platform and migration project

= Many facepalms

Contracting and BAA Approval

Not the worst I've been through, but…
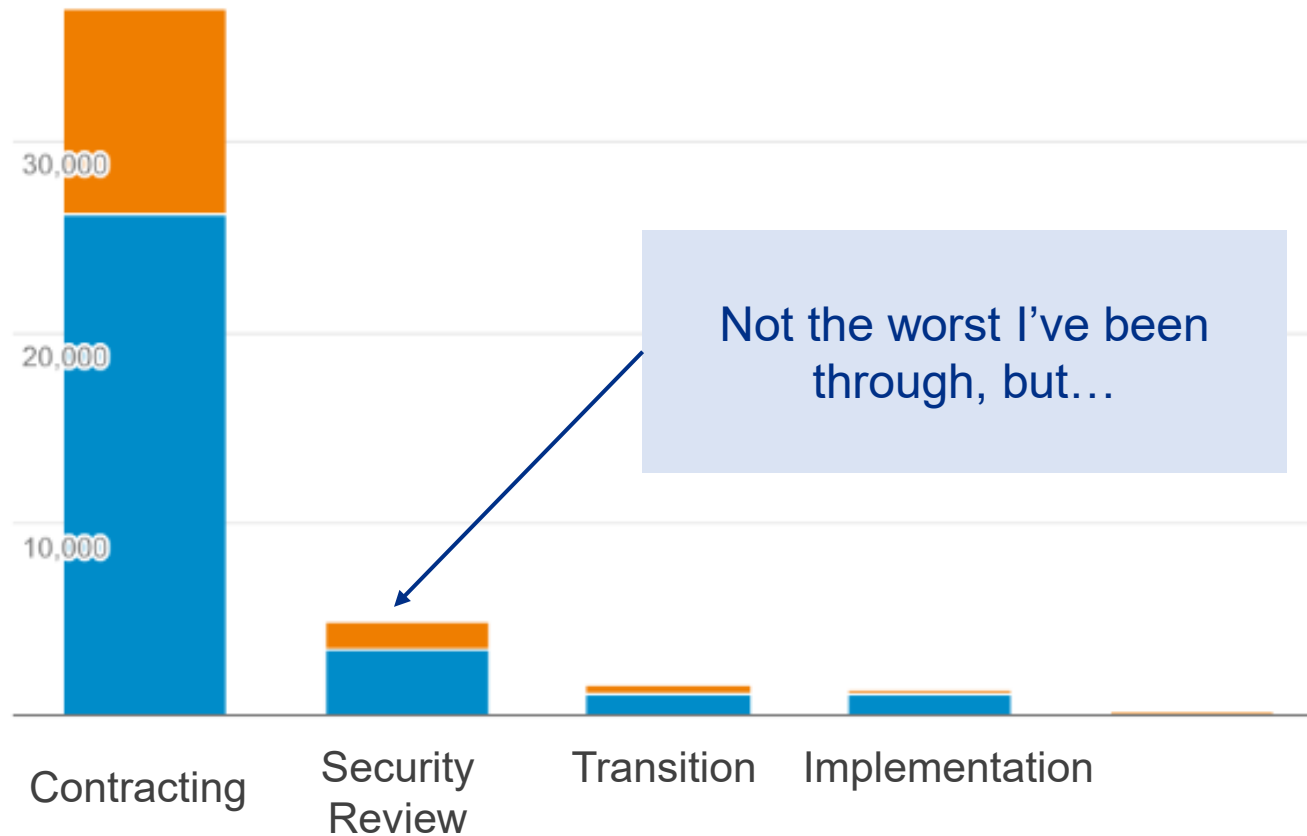
- Offshore vendor
- Hosted Azure environment
- A bit of "what are you doing?"

Big Plus: CIO and Chief Information Security Officer fully backed the move off Google

Contracting   Security Review   Transition   Implementation

Backups, Transition, Training and Final Switch
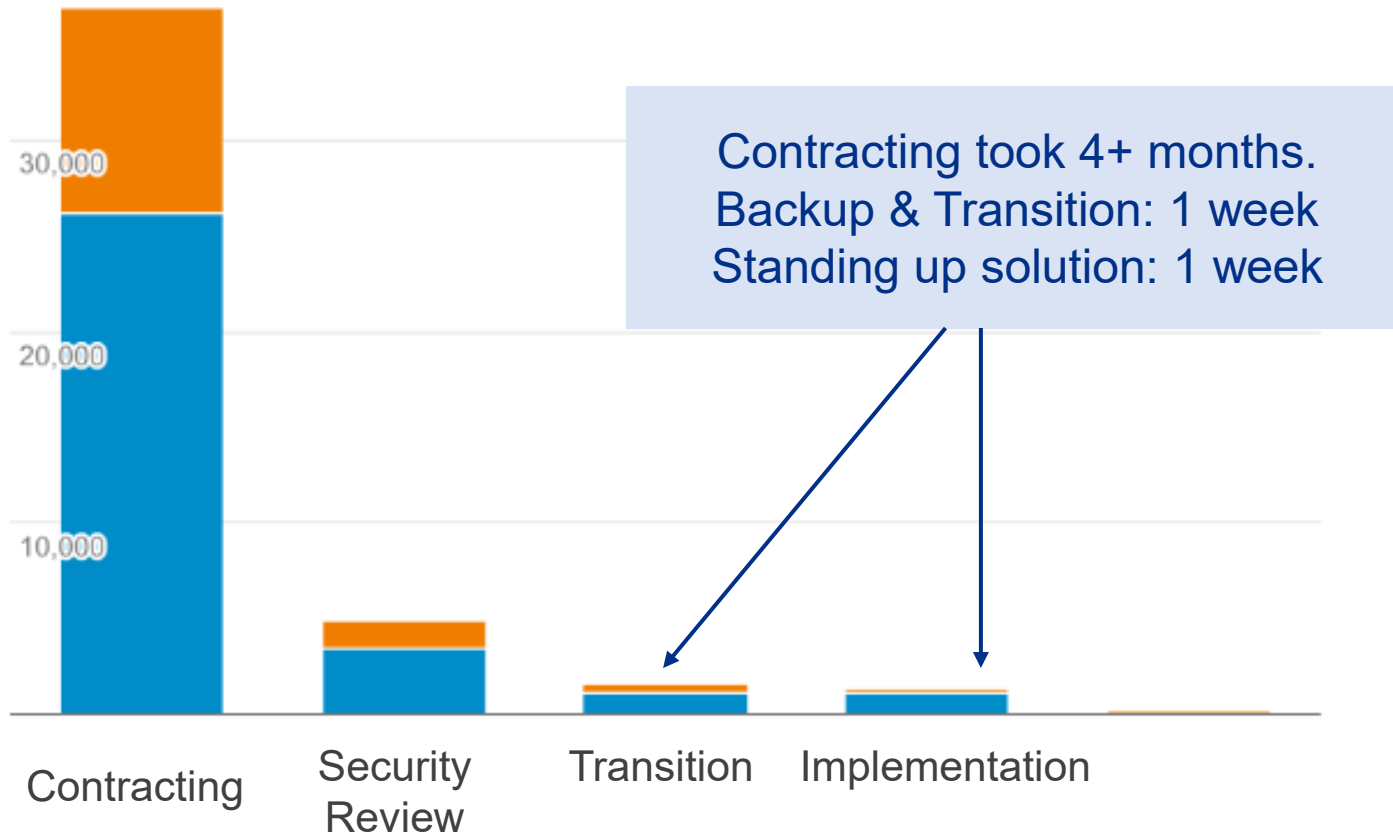
Contracting took 4+ months.
Backup & Transition: 1 week
Standing up solution: 1 week

- Offshore vendor
- Offshore vendor that likely saw the biggest single quarter sales spike in their existence
- Started the purchasing process during a website re-platform and migration project
- Natural timeline of software contracting

Poll Question #4: What have you done so far?

What are your concerns about choosing a vendor?

Free text

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True or False?

Switching from Google Analytics means we'll lose all our data, the work, and the insights we've built over time.

False

Switching from Google Analytics means we'll lose all our data, the work, and the insights we've built over time.

By using a HIPAA-compliant marketing technology stack, you can securely migrate and maintain your historical data. In fact, you gain the added benefit of enhanced privacy controls while continuing to leverage analytics tailored to your specific needs. The right tools will even allow for seamless integration and reporting continuity, ensuring no gaps in your marketing strategy. You can keep your historical data by exporting it from Google Analytics and using API integration to store it in a HIPAA-compliant database. Setting up a data warehouse, such as AWS, Azure, or Google BigQuery, ensures secure storage of large data volumes with easy access and retrieval, while custom migration tools can also help transfer insights to your new platform.

True or False?

We'll lose our audience and users by switching off Google Analytics

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False

We'll lose audience or users by switching from Google Analytics

Switching to a HIPAA-compliant analytics platform doesn't mean you'll lose your audience or users. Your audience data can still be tracked and analyzed effectively with a compliant solution, often providing deeper insights and improved privacy protections – with less noise in your metrics.

The key is to ensure proper integration of the new platform, allowing you to maintain user engagement and marketing effectiveness without disruption.

True or False?

All Google Analytics alternatives are extremely expensive (high costs).

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False

All Google Analytics alternatives are extremely expensive (high costs)

While some enterprise analytics platforms can be costly, there are HIPAA-compliant alternatives that offer scalable pricing and flexible plans, making them accessible and cost-effective for healthcare organizations.

Examples include:
- **Piwik PRO**: Provides tailored solutions for healthcare systems, with free and paid options designed for privacy compliance, including HIPAA, and offers a BAA.
- **Heap**: Offers healthcare organizations a HIPAA-compliant platform with competitive pricing tiers, and will sign a BAA for secure handling of health data.
- **Plausible Analytics**: A privacy-focused tool that offers scalable pricing and will sign a BAA, ensuring HIPAA compliance for health systems managing sensitive patient data.

True or False?

Removing Google Analytics will negatively impact Google Ads performance

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False

Removing Google Analytics will negatively impact Google Ads performance.

You can still effectively run and optimize Google Ads campaigns without relying on Google Analytics, keeping both your marketing efforts and patient data safe. Removing Google Analytics does not directly impact the performance of Google Ads (formerly known as AdWords)

While Google Analytics provides useful insights for ad campaign tracking, there are many HIPAA-compliant analytics alternatives that can integrate seamlessly with Google Ads for tracking and reporting without compromising data privacy.

True or False?

Removing Google will make integration and consent management difficult, with fewer integration options available.

False

Removing Google will make integration and consent management difficult, with fewer integration options available.

Removing Google services does not limit your integration and consent management options. Many HIPAA-compliant platforms provide robust integration capabilities, often offering more flexibility in handling healthcare data.

Solutions like **Piwik PRO** and **OneTrust** support extensive integrations with various marketing and analytics tools while providing advanced consent management features that meet strict healthcare regulations. These platforms offer a wide array of integration options and work seamlessly with other healthcare technology providers, ensuring compliance without sacrificing functionality.

You'll still have access to many integration and consent management tools tailored specifically for healthcare organizations.

One Year Later: What We Learned

- The pervasiveness of Google
- Other Google landmines
- The noise in the Google data
- Vendor readiness
- What we would have done differently

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The Pervasiveness of Google
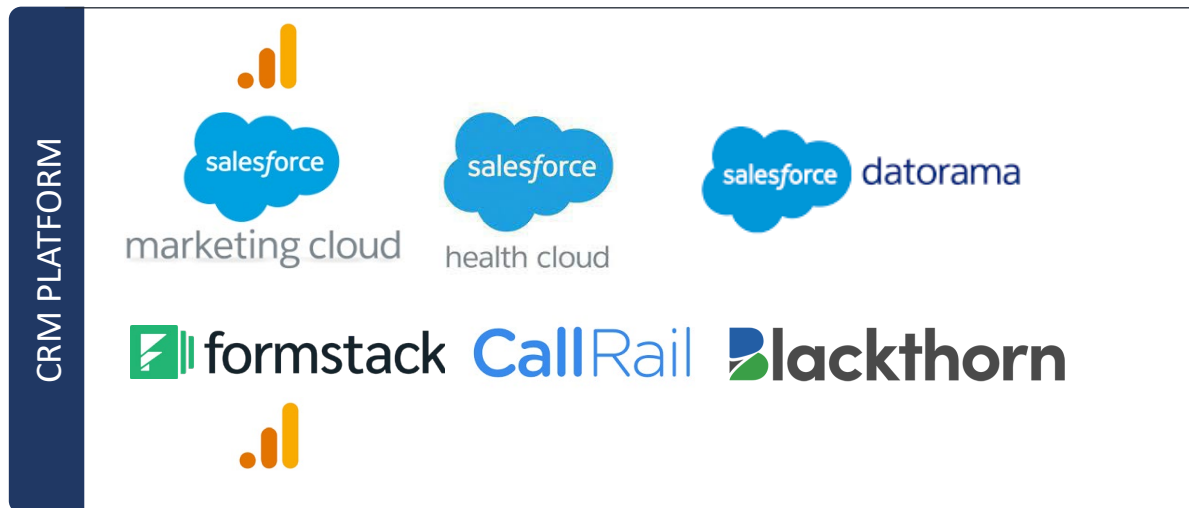
Other landmines: Analytics is all we should worry about, right?

Wrong! Web tracking isn't the only endpoint you'll want to secure.

YOUTUBE

Embeds on websites track interactions (clicks, views, location).
- **Risk:** Potential exposure of sensitive user behavior.
- **HIPAA Concern:** Unauthorized sharing of Protected Health Information (PHI), leading to compliance breaches.

GOOGLE MAPS API

Tracks user location data, which could reveal visits to healthcare providers.
- **Risk:** Exposure of user health status through location data.
- **HIPAA Concern:** PHI transfer without safeguards, compromising compliance.

GOOGLE TRANSLATE

Processes content externally; PHI included in translations can be exposed.
- **Risk:** Unauthorized exposure of sensitive data.
- **HIPAA Concern:** Violations without a Business Associate Agreement (BAA).

GOOGLE FLOODLIGHTS

Tracks user activity for marketing; healthcare-related behavior could be monitored.
- **Risk:** Behavioral data exposes PHI.
- **HIPAA Concern:** Breach of PHI without proper consent.

GOOGLE GEOLOCATOR

Pinpoints user locations; sensitive locations may be revealed.
- **Risk:** Exposes locations such as clinics or hospitals, etc.
- **HIPAA Concern:** Sharing or storing this data without safeguards.

YOUR OTHER VENDORS...

Many third-party tools, such as analytics or marketing automation services, collect and process user data. If these vendors are not HIPAA-compliant or do not sign BAAs, they may mishandle or expose PHI, leading to HIPAA violations. It's critical to ensure that all third-party tools used in healthcare environments comply with HIPAA standards to avoid breaches.

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Going Forward

Keep an eye on your state laws & changing legislation. Work with your legal & compliance teams on what your organization's comfort level is with any grey areas. Keep in mind future refinement and adaptability will be essential.

Build a strong data & governance foundation. Build upon this with the right technology, people and process.

Think about the data's journey. This will help both from a compliance standpoint and for the ability to create an end-to-end HIPAA-compliant data supply chain.

Take periodic inventory. Reviewing BAAs, vendors, web properties & data maps regularly can help you stay ahead of issues proactively.
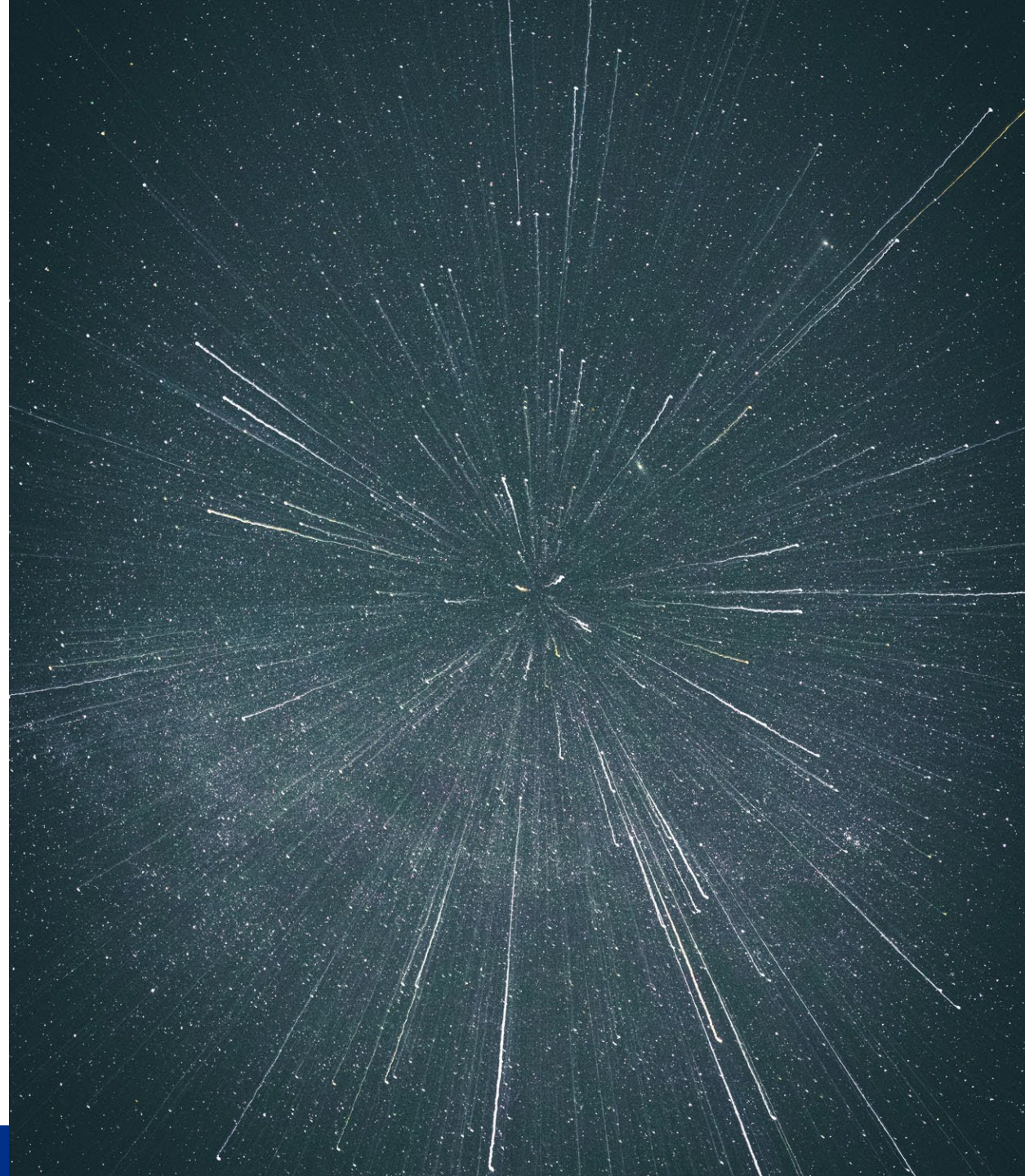
Summary: The Good, The Bad & The Not So Ugly

THE GOOD	THE BAD	THE NOT SO UGLY
6-month implementation	Original GA Account was a mess & not sure where the tracking code had been dropped (affected YOY analysis)	Overall, the analytics, heat mapping, tagging & YouTube Migration
No regrets on chosen platform		Transition analytics
No need to restructure UTMs/tracking codes	Protracted contracting period	Integrations
Dashboards & custom reports easy to build	The pervasiveness of Google extends past Google Analytics	YOY a bit manual, but doable for the first year
Executive & Legal Support		
No Adwords impact		

Unlock

Bibliography/References

- OCR/HHS Guidelines
- https://www.hipaajournal.com/
- Search engine land – low-cost alternatives to Google
- **SEM Rush:** 15 Best Google Analytics Alternatives for 2023
- Compliance map, Slide 15: https://iapp.org/, https://www.mwe.com/resource/global–privacy–cybersecurity–resource–center/#map

Questions?

Please be sure to complete the session evaluation on the mobile app!

Increased cybersecurity pressure

HHS Concept Paper

The HHS released a concept paper outlining four major steps the department will take to advance healthcare cyber resiliency.

- Establish voluntary cybersecurity goals for the healthcare sector to streamline confusion with numerous existing standards.
- Provide resources to incentivize and implement cybersecurity practices. HHS said it "will work with Congress" to impose financial consequences for hospitals that will help drive short- and long-term improvements.
- Implement a strategy to support greater enforcement and accountability.
- Propose new cybersecurity requirements for hospitals through Medicare and Medicaid.
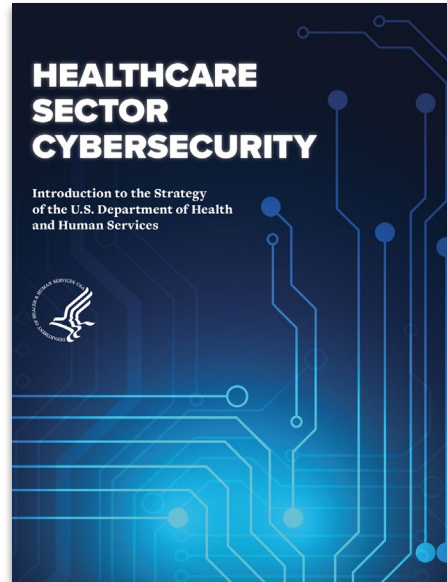
2025 Department of Health & Human Services Budget

The 2025 budget recommends new penalties for hospitals and health systems for not meeting what the Administration defines as essential cybersecurity practices.

- Beginning in FY 2029, the Administration proposes to enforce adoption of essential practices with hospitals failing to meet these standards with financial penalties.
- Critical access hospitals that fail to adopt the essential practices would incur a payment reduction.
- The American Hospital Association submitted a statement stating its concerns for potential penalties for hospitals and health systems that do not meet cybersecurity standards outlined by the Biden administration.
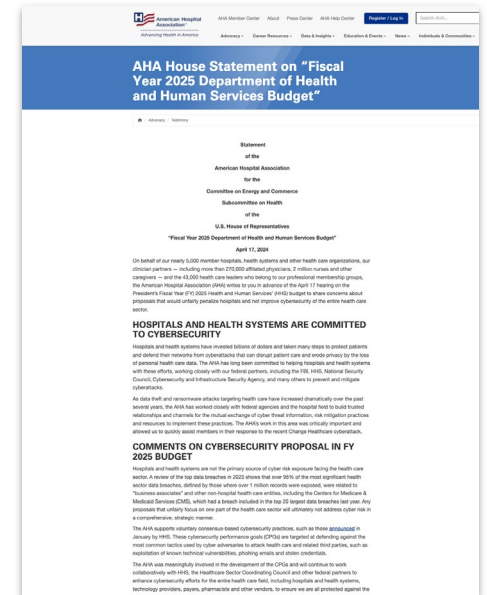
First party data

Now more important than ever.

- Chrome has started restricting third-party cookies by default for 1% of Chrome browsers

- A new feature called Tracking Protection, which restricts third-party cookies by default, began rolling out January 4th

- While Google has halted the Chrome cookie deprecation, first party data strategies are increasingly important.

Ensuring a strong first party data strategy *and* leveraging it will be important for building marketing efficiency.

Compliance maturity

STRATEGIC VALUE (vertical axis)

DATA MATURITY (horizontal axis)

Operational Efficiency
- Standardize data
- Initial data governance
- Data collection operational efficiency
- Privacy and security compliance

Organizational Agility
- Expanded data layer
- Data management operational efficiency
- Basic patient/HCP profiles
- Healthcare rules for core use cases
- Audience management across core destinations

Outcome Optimization
- Customer data supply chain, governance
- Flexible infrastructure
- Single view of patient/HCP integrated across stack
- Data orchestration
- Data quality visibility
- Consent management and transparency

Scale
- Customer data supply chain, governance
- Flexible infrastructure
- Single view of patient/HCP integrated across stack
- Data orchestration
- Data quality visibility
- Consent management and transparency