

Occupational Therapy Assessment Package (OTAP) and the Management of Personal Information

This document was last updated 18 October 2019.

1. Summary of the contents of this document

- The purpose of the OTAP software and **why the OTAP software is critical for occupational therapy practice**
- Where OTAP data are stored, and **how data storage takes into consideration right to privacy acts**
- Use of OTAP software in the **pseudonymous mode** whereby the name of the person tested is omitted from data stored
- Details about **what information is and is not stored in OTAP**
- How data that must be exported to the Center for Innovative OT Solutions (CIOTS) for the occupational therapist's completion of rater certification are managed, including, for occupational therapists exporting data from the European Union, **how data are managed so as to uphold adequate protection in compliance with the European Commission's Standard Contractual Clauses (processors) (2010/87/EU) (the "SCC") as outlined in our GDPR Data Processor Agreement**

2. Purpose of the OTAP software

- OTAP is a software program that is necessary for occupational therapists to perform complex mathematical modeling of ordinal, raw item test scores to create
 - Equal-interval, summary measures (i.e., test results) of a person's ability to perform daily life tasks (activities of daily living, social tasks, or schoolwork tasks)
 - Reports that summarize the person's test results and how they are interpreted
- CIOTS assessment tools that occupational therapists use with the OTAP software include the following:
 - **AMPS**: Assessment of Motor and Process Skills
 - **ACQ-OP**: Assessment of Compared Qualities — Occupational Performance
 - **ESI**: Evaluation of Social Interaction
 - **ACQ-SI**: Assessment of Compared Qualities — Social Interaction
 - **School AMPS**: School Version of the AMPS

3. Why the OTAP software is critical for occupational therapy practice

- Occupational therapists use the OTAP software for the following purposes that are critical to their professional role and provision of quality services:
 - Generate test results used to identify a person's need for occupational therapy services
 - Generate test results used to predict what intervention strategies might be most cost effective and beneficial for the person

- Generate test results used to evaluate the effectiveness of provided interventions, quality assurance, and program evaluation

4. Where OTAP data are stored

- OTAP data (e.g., test scores) are stored on the computer where the OTAP software is installed; see **Section 5** for more about what data are stored in the OTAP software
- The OTAP software is installed on the occupational therapist's computer or the employer's server computer
- The OTAP software never sends data to or stores data at CIOTS
 - For more information about what data are transferred by the occupational therapist to CIOTS for completion of rater certification and how those data are managed according to a *GDPR Data Processor Agreement*, see **Section 7**
 - The only purpose for which the OTAP software communicates with CIOTS is to check for software updates; visit www.innovativeotsolutions.com/software/download/#1354 for more information about how the OTAP software checks for software updates

5. Considerations related to right to privacy acts

- **Collection of the least amount of personal information necessary:** Only minimal data necessary for occupational therapy health care evaluations and interventions (i.e., generating test results related to a CIOTS assessment tool) are stored in OTAP
- **Use of data programs by health care professionals:** Given occupational therapists' professional obligation to maintain all information about their clients confidential, right to privacy acts allow for the limited use of data programs by health care professionals when used to store personal information required for provision of professional services
- **Data directly linkable to a living person:** No data directly linkable to a living person (e.g., name, hospital- or government-issued ID number) are stored in OTAP provided it is installed in the pseudonymous mode; if not installed in the pseudonymous mode, occupational therapists are allowed to enter into OTAP the names of the persons tested by the occupational therapist
- **Sensitive personal information:** No information is stored in OTAP related to a person's race, ethnic origin, religious or philosophical views, sexual orientation, political opinions, or membership in professional unions; minimal health-related information is stored; see **Section 5** for more about what types of information are stored in the OTAP software
- **Installation in pseudonymous mode**
 - The OTAP software must be installed in a pseudonymous mode to ensure that the person's name cannot be stored in the OTAP software
 - The installation mode is determined by the person (occupational therapist or information technology [IT] personnel) who installs the program
 - The selected installation mode applies to all occupational therapists who enter data into that OTAP installation
 - The selected installation mode cannot be changed after the OTAP software is installed
 - When the pseudonymous mode is used, the person is assigned a random OTAP ID number; OTAP ID numbers must be retained by occupational therapists and kept secure according to the established procedures within their work settings (the security of such procedures, that

also apply to code books and hard copies of test score forms, are judged to be outside the domain of concern that pertains to OTAP security issues)

- **Deletion, correction, and updating of stored data:** All information stored in the OTAP software can be deleted, corrected, or updated by the occupational therapist who tested the person and who entered that test data into OTAP
- **Data encryption and password protection:** All data stored in the OTAP software are encrypted and password-protected to ensure that only the occupational therapist who tested the person and who entered that test data into OTAP can access that data; occupational therapists have a professional obligation to maintain appropriately secure passwords and not share their passwords with others, including IT personnel, to ensure that all information about their clients remains confidential

6. Information stored in the OTAP software

- Information stored in the OTAP software is insufficient to be directly connected to a specific person. More specifically, only the following information is stored in the OTAP software:
 - **Gender:** required because the age norms may differ between genders
 - **Date of birth:** required to enable calculation of norm-referenced scores (i.e., z score, percentile rank, normalized standard score) as well as norm-referenced interpretations of the person's measure (i.e., determination of whether or not the person's test results were within the expected range in relation to people who are the same age)
 - **Date of evaluation:** required to identify when the evaluation was administered and the length of time that has passed between evaluations when tracking a person's progress/change over time
 - **Global category of the person's diagnosis(es), if any** (e.g., Cardiovascular, Developmental disability, Hip fracture/replacement, Schizophrenia, Right-sided cerebral vascular accident): required for rater certification (e.g., determining if the occupational therapist administers the test in a valid and reliable manner)
 - **Raw test item scores:** required to estimate the person's measures (i.e., test results) of the person's ability to perform daily life tasks
 - **Global baseline statement** (e.g., Making a sandwich: minimal effort, moderate inefficiency, independent): required to generate reports
 - **Skills of significance and/or goals:** optional (not required)
 - **Occupational therapy recommendations:** optional (not required)

7. Information not stored in the OTAP software

- **Person's name** (when the pseudonymous mode is used, this information is temporarily entered while generating reports, but is not stored)
- **Person's overall measure** (i.e., test results)
- **Person's official identification number** (e.g., the person's hospital- or government-issued identification number)
- **The specific International Classification of Disease (ICD) diagnostic codes** that apply to the person's diagnosis(es), if any

- **PDF reports:** test results summaries used for professional purposes (e.g., evaluating need for services, evaluation of progress); the occupational therapist uses the OTAP software to create these reports as needed and stores them in a separate location as deemed appropriate and secure by the occupational therapist and/or IT personnel

8. Management of personal information during rater certification

- Occupational therapists who are training to use one of CIOTS assessment tools must be certified by CIOTS to ensure that they are using the assessment tool in a valid and reliable way. Occupational therapists, therefore, who wish to become certified in that assessment tool must export from OTAP and transfer to CIOTS limited data for an initial group of people that they test. Occupational therapists are only permitted to transfer data to CIOTS for people who agreed to be tested and have their de-identified test data transferred to CIOTS. Data processing during the certification process are performed in accordance with the instructions given in a *Data Processor Agreement* with the occupational therapist, who remains the data controller. Read our standard *Data Processor Agreement* on our website: www.innovativeotsolutions.com/dpa
- **What data do we process?**
 - Only the age, gender, general diagnostic category (if any), and test scores of the persons tested are exported by the occupational therapist and transferred to CIOTS for data processing
 - **At no time can CIOTS identify any of the persons that the occupational therapist tested**
- **How do we receive your data and for what purposes do we process your data?**
 - Occupational therapists export from OTAP to a data file the de-identified test data only for people who agreed for their data to be sent to CIOTS
 - Occupational therapists then transfer the exported data file to CIOTS using a secure Internet connection
 - CIOTS uses the data to certify that occupational therapists are using the assessment tool in a valid and reliable way
 - After occupational therapists complete the certification process, the data are rendered irreversibly anonymous and aggregated with other anonymized test data for research and development purposes; the anonymized and aggregated data do not contain personal data and do not constitute personal data in format or contents
- **How do we secure an adequate level of protection for your data?** In order to uphold an adequate level of protection during the transfer of the de-identified personal data by an occupational therapist in the European Union to CIOTS, the European Commission's Standard Contractual Clauses (processors) (2010/87/EU) (the "SCC") applies together with our *Data Processor Agreement* throughout the term of the processing of personal data. The SCC stipulates the specific obligations about the transfer and processing of personal data. See the SCC with our standard *Data Processor Agreement*: www.innovativeotsolutions.com/dpa

For more information, contact

Center for Innovative OT Solutions

4223 S. Mason, Suite A

Fort Collins CO 80525 / USA

e-mail: info@innovativeotsolutions.com

Phone: +1 970 416 8612