Privacy Report 2

WEBSITES FOR OPIOID ADDICTION TREATMENT AND RECOVERY SERVICES: DATA SHARING AND PRIVACY RISKS

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Date: November 14, 2022
**Opioid Policy Institute**
The Opioid Policy Institute is a research think tank that uses a multi-pronged approach to better understand the gaps in treatment and recovery services. Our current areas of focus include technology and stigma/discrimination. To learn more about our work, visit us at: opioidpolicy.org.

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Founded in 1973, the Legal Action Center (LAC) uses legal and policy strategies to fight discrimination, build health equity, and restore opportunity for people with arrest and conviction records, substance use disorders, and HIV or AIDS. To learn more, visit us at: lac.org.

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**Disclosures**
*Potential conflicts of interest include the following: Jonathan JK Stoltman served as an external consultant for Confidant Health (July 2020 – January 2021). To avoid bias, this service was included in the analysis. Jonathan JK Stoltman is also CEO of Regista Health, a consulting service designed to support privacy and security-centered design for mHealth services.*

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Executive Summary

Addiction treatment and recovery services are increasingly delivered online and through mobile apps. The websites for these services handle multiple functions, including: to screen and enroll patients; to receive patient referrals from providers; to provide a telehealth platform; a destination for online advertising; to inform potential patients and providers about the services offered; or to direct potential patients to install the mobile app. Current and prospective patients, as well as providers, interact with these services’ websites in order to learn more or to access help. Virtual care platforms for addiction treatment and recovery services are commonly presented and perceived as being more private than in-person treatment.

Privacy is an essential component of addiction treatment and recovery due to the various risks associated with disclosing drug use, and due to persistent stigma and discrimination against people with substance use disorders. Concerns about confidentiality frequently rank among individuals’ most common reasons for not accessing substance use disorder treatment. Many addiction treatment providers follow strict federal confidentiality requirements, and many recovery support services and harm reduction services operate on the central premise of anonymity. Privacy rights are inherently bound with individuals’ right to bodily autonomy and self-determination – issues which are currently in the spotlight following the Supreme Court’s Dobbs decision and the wave of state laws criminalizing abortion. The privacy features of these virtual care platforms’ websites, however, are not well studied.

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2 42 USC § 290dd–2; 42 CFR Part 2.

3 Our previous study analyzed the privacy issues with 10 apps for opioid use disorder treatment and recovery services; see Report 1: Privacy and Security of Digital Opioid Addiction Treatment and Recovery Apps in the Google Play Store.
Using the publicly available Blacklight tool developed at The Markup, we analyzed the websites of 12 virtual care platforms for opioid use disorder (OUD) that provide treatment or recovery services (hereinafter referred to as “OUD mHealth websites”) at four timepoints over 16 months. We assessed various data collection practices, including the use of ad trackers, third-party session cookies, session recording, key logging, Meta (Facebook) Pixel, and Google Analytics. These 12 websites averaged 57,000 website visits each in June 2022, and their respective companies have received a combined $795 million in public and venture capital funding.

**Key Findings**

- All 12 OUD mHealth websites hosted tracking technology to share identifying information with third parties over the 16-month observation period.
- Over time, the number of trackers *generally increased*.
- The potential data collection and sharing varied greatly *between* and *within* services over the 16-month observation period, potentially complicating patients’ and providers’ ability to evaluate these services’ privacy standards.
- At least four OUD mHealth websites shared identifying information with Meta (Facebook), despite Meta’s policy not to receive sensitive, health-related information.
- Most (10/12) used Google Analytics at some point during the observation period, despite Google’s policy that Google Analytics should not be used to collect data with personally identifiable information or protected health information.
- Many of the OUD mHealth websites marketed themselves as “private,” “secure,” or “100% confidential.”

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4 “The Markup is a nonprofit newsroom that investigates how powerful institutions are using technology to change our society.” About Us, The Markup, [https://themarkup.org/about](https://themarkup.org/about) (last visited Aug. 17, 2022).
To our knowledge, this is among the first attempts to document the actual privacy practices on websites for virtual care platforms for addiction treatment and recovery services using multiple time points.

By shining a light on these issues, we hope that legislators and other policy makers take necessary measures to protect individuals who need treatment and recovery support. In order to fulfill their promise of expanding access to quality care, virtual care platforms for OUD treatment and recovery should meet or exceed the privacy and security standards for in-person care.

Full data set is available here: https://airtable.com/shrqOLXVnzYrV6H0m
Introduction

Addiction treatment and recovery services are increasingly delivered online and through mobile apps. This new modality has the potential to shift the paradigm around substance use disorders by dramatically expanding access to care, saving lives and improving health overall. Private financing\(^5\) and government funding\(^6\) to accelerate digital health services have soared during the COVID-19 pandemic and the surging overdose epidemic. Legislation and regulatory oversight, however, have lagged behind the pace of funding, particularly for protecting the privacy and security of sensitive, addiction-related health information.

Addiction Treatment and Recovery: A Tradition of Confidentiality

Multiple federal and state health privacy laws apply to addiction treatment information. The central example of these privacy laws is “Part 2,” or Section 290dd–2 of Title 42 of the U.S. Code and its accompanying regulations at 42 CFR Part 2.\(^7\) These federal protections guarantee the confidentiality of treatment records and protect patients from having their substance use disorder (SUD) used against them. In the fields of recovery support and harm reduction, where Part 2 and HIPAA may not necessarily apply, the power of anonymity and confidentiality are both central touchstones as well: Alcoholics Anonymous, Narcotics Anonymous, harm reduction centers that offer syringes and safe supplies for drug use, and overdose prevention sites all operate on the foundational premise of anonymity.

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\(^7\) 42 USC § 290dd–2; 42 CFR Part 2.
For nearly 50 years, Part 2’s strict privacy rule has sought to protect confidentiality so that patients are not made more vulnerable to arrest, prosecution, or discrimination because of seeking treatment for their addiction. Nearly all addiction treatment providers must also comply with the HIPAA Privacy and Security Rules. Both laws protect the privacy of information related to an individual’s health or treatment, including identifiers like name or date of birth, but also any information reasonably could identify an individual. Both laws prohibit covered providers from unilaterally sharing protected information with third parties for marketing purposes, among many other protections. The HIPAA Privacy Rule also requires written patient authorization before a covered entity sells protected health information for any reason, including any disclosure that results in direct or indirect payment from a third party.

Given the sensitive and criminalized information elicited in SUD treatment and recovery support — including criminalized substance use — confidentiality protections act as a safeguard to encourage people to seek help despite facing criminal prosecution, deportation, loss of child custody, or discrimination in housing, employment, benefits, or more. There are also potential national security risks for sensitive health data, particularly for government officials or family members who seek or receive addiction treatment and may be vulnerable to blackmail. Moreover, patients identify confidentiality as a major concern, especially online: according to a recent

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8 Health Insurance Portability and Accountability Act (HIPAA), 45 CFR Parts 160, 162, and 164.
9 See 42 CFR § 2.11 (definition of “patient identifying information”); 45 CFR § 160.103 (definition of “individually identifiable health information”).
10 See 42 USC § 290dd-2(a) (“Records of the identity, diagnosis, prognosis, or treatment of any patient which are maintained in connection with the performance of any program or activity relating to substance use disorder education, prevention, training, treatment, rehabilitation, or research, which is conducted, regulated, or directly or indirectly assisted by any department or agency of the United States shall . . . be confidential and be disclosed only for the purposes and under the circumstances expressly authorized under subsection (b) [permitting disclosures with patient consent and limited other cases].”); see also 45 CFR §§ 164.501, 164.508(a)(3) (requiring an individuals’ written authorization before a HIPAA-covered entity may use or disclose protected health information for marketing purposes).
study by the American Medical Association, “more than 92% of patients believe privacy is a right and their health data should not be available for purchase.” In this same study, patients expressed that they were least comfortable with “big tech” or social media companies receiving access to their health data.

**About Virtual Care Platforms for Addiction Treatment and Recovery Services**

Virtual care platforms for addiction treatment and recovery services offer a range of services, including everything from social networks for people in recovery to telehealth visits with a doctor who can prescribe buprenorphine for OUD. The websites for these services handle a range of functions, including: to screen and enroll patients; to receive patient referrals from providers; to provide a telehealth platform; a destination for online advertising; to inform potential patients and providers about the services offered; or to direct potential patients to install the mobile app. Current and prospective patients, as well as providers, interact with these services’ websites in order to learn more or to access help.

Consistent with the long-standing tradition of privacy and anonymity in the field, many virtual care platforms for addiction treatment and recovery services market themselves as “private,” “secure” or “100% confidential.” The promise of confidentiality appears prominently on many of the OUD mHealth websites we studied and associated advertising on Meta (Facebook) directing individuals to the websites. See [Appendix 5 (Privacy Mentions on OUD mHealth Websites)](https://www.ama-assn.org/press-center/press-releases/patient-survey-shows-unresolved-tension-over-health-data-privacy) and [Appendix 6 (Privacy Mentions in Meta (Facebook) Advertising)](https://www.ama-assn.org/press-center/press-releases/patient-survey-shows-unresolved-tension-over-health-data-privacy) for select examples. The reality, however, is that these websites may not be as private or confidential as users might expect.

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Specific Aims

This report aims to describe actual data collection practices by websites for major virtual care platforms for addiction treatment and recovery services. We hope this report can be used by legislators and other policymakers to better understand the need for additional legal oversight and enforcement of privacy protections in this field.

This report builds on our previous work (Report 1: Privacy and Security of Digital Opioid Addiction Treatment and Recovery Apps in the Google Play Store), which highlighted privacy issues with ten mobile apps marketed as opioid addiction treatment or recovery supports, and available in the Google Play Store. This previous report found that many of the apps collected information that was unrelated to treatment and shared identifying information with third-party advertising and tracking services, including in ways that potentially violate federal health privacy laws like HIPAA and Part 2.
Methodology

We identified 12 websites for companies that offer a major virtual platform for addiction treatment or recovery services:

<table>
<thead>
<tr>
<th>Services</th>
<th>URL</th>
</tr>
</thead>
<tbody>
<tr>
<td>Bicycle Health</td>
<td><a href="http://www.bicyclehealth.com">www.bicyclehealth.com</a></td>
</tr>
<tr>
<td>Boulder</td>
<td><a href="http://www.boulder.care">www.boulder.care</a></td>
</tr>
<tr>
<td>Bright Heart Health</td>
<td><a href="http://www.brighthearthelth.com">www.brighthearthelth.com</a></td>
</tr>
<tr>
<td>Confidant Health</td>
<td><a href="http://www.confidanthealth.com">www.confidanthealth.com</a></td>
</tr>
<tr>
<td>DynamiCare Health</td>
<td><a href="http://www.dynamicarehealth.com">www.dynamicarehealth.com</a></td>
</tr>
<tr>
<td>Kaden</td>
<td><a href="http://www.kadenhealth.com">www.kadenhealth.com</a></td>
</tr>
<tr>
<td>Loosid</td>
<td><a href="http://www.loosidapp.com">www.loosidapp.com</a></td>
</tr>
<tr>
<td>Ophelia</td>
<td><a href="http://www.ophelia.com">www.ophelia.com</a></td>
</tr>
<tr>
<td>PursueCare</td>
<td><a href="http://www.pursuecare.com">www.pursuecare.com</a></td>
</tr>
<tr>
<td>reSET-O</td>
<td><a href="http://www.resetforrecovery.com/patient">www.resetforrecovery.com/patient</a></td>
</tr>
<tr>
<td>SoberGrid</td>
<td><a href="http://www.sobergrid.com">www.sobergrid.com</a></td>
</tr>
<tr>
<td>Workit Health</td>
<td><a href="http://www.workithealth.com">www.workithealth.com</a></td>
</tr>
</tbody>
</table>

About the websites and their companies. These 12 OUD mHealth websites and their companies cover a range of approaches to addiction treatment and recovery services. Most websites have a corresponding mobile app that provides additional services. Most services offer access to medical providers who prescribe medication for opioid use disorder (MOUD), and many services also offer behavioral therapy and coaching. Two of the services offer peer-to-peer social networks for people in recovery. See Appendix 1 for more information about the services offered by each website and its company.

Selection criteria. We selected these 12 websites for study because (a) their companies have received significant venture capital or funding from the National Institutes of Health (NIH) or (b) they enabled us to compare with
services that received this funding. On average, the companies have raised $66.3 million in funding (approximate total funding: $795.1 million; range: $6.6 million – $409 million). Five services received public funding from the National Institutes of Health. In June 2022, the homepages averaged 57,000 visits (approximate total visits: 683,900; range: <5,000 – 214,300). See Appendix 2.

**Primary Privacy Analysis: Blacklight**

In order to conduct the primary privacy analysis, we used a free tool called Blacklight, developed in 2020 by researchers and journalists at The Markup to provide the public with a real-time privacy inspector for websites.14 Blacklight performs an automated inspection of a website to reveal the specific user-tracking technologies on the site and the recipients of the data; it does not provide a definitive investigation of all privacy issues.15 We focused our analysis on ad trackers, third-party cookies, session recording, Meta (Facebook) Pixel, and Google Analytics. *Blacklight analysis does not show whether the OUD mHealth websites affirmatively installed all the tracking technologies.*

**Jonathan JK Stoltman captured data collection practices at four time points:** March 15, 2021; October 3, 2021; June 27, 2022; and July 28, 2022. The first analysis occurred before the release of our report on privacy and security issues for OUD mHealth apps. The final two analyses occurred after the release of the Supreme Court’s ruling in *Dobbs,*16 in an environment with elevated attention about the importance of health privacy.17

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Secondary Privacy Analysis: Related Meta (Facebook) Data

To further understand whether Meta (Facebook) actually received data from these websites, we used an approach similar to the investigation led by Grace Oldham and Dhruv Mehrotra at Reveal: 18

- On August 25, 2022, Jonathan JK Stoltman created a new Facebook profile ("Bill Wilson") and Chrome profile (no plugins, clean browser, and clean cache) to use exclusively for data collection related to this analysis.

- On August 25, 2022, they logged in to the new Facebook profile and left the tab open, then visited the 12 OUD mHealth websites in this report. They simulated the behavior of a potential patient or provider by clicking through various portions of the website. They filled out provider and patient forms when available.

- On August 27, 2022, they used Meta’s Privacy Center to download and review the “Off-Facebook Activity” to analyze what data Meta (Facebook) indicated was associated with these companies.

Results

Summary

- 12/12 websites used ad trackers that identify people who visit these sites and use the data for advertising purposes; the average number of ad trackers increased during the observation period and was highly variable.

![Figure 1. Summary Table](image)

- 11/12 websites used third-party cookies that identify people who visit these sites and track them across other websites to serve ads based on their web history; the average number of third-party cookies increased during the observation period and was highly variable.
- 4/12 websites used session recording during the observation period.
• **6/12** websites used the **Meta (Facebook) Pixel**; **4/12** websites appeared in “**Off Facebook**” Activity log.
• **10/12** websites used **Google Analytics**, which can be used to track people who visit these sites for targeted advertising across the internet.
• **12/12** websites sent some data to advertising technology (ad tech) companies that buy and sell user data for advertising.

See **Appendix 3** for more information about broken down by service.

Full data set is available here: [https://airtable.com/shrqOLXVnzYrV6H0m](https://airtable.com/shrqOLXVnzYrV6H0m)
Ad Trackers

About Ad Trackers (from Blacklight): Ad trackers are technologies that identify and collect information about users. These technologies usually (but not always) appear with some level of consent from the website owners. They are used to collect website user analytics, for ad-targeting, and by data brokers and other information collectors to build user profiles.

- **12/12** websites used some form of ad trackers at each time point.
- The average number of ad trackers *increased* during the 16-month observation period (4 → 5 trackers per site).
- The number of ad trackers used by each service was highly variable (range: 1-10).

Figure 2. Ad Trackers

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Third-Party Cookies

About Third-Party Cookies (from Blacklight)²⁰ Third-party cookies are a small piece of data that tracking companies store in your web browser when you visit a website. This bit of text – usually a unique number or string of characters – identifies you when you visit other websites that contain tracking code from the same company. Third-party cookies are used by hundreds of companies to build dossiers about users and deliver customized ads based on their behavior.

- 11/12 websites used some form of third-party cookies at each time point.
- The average number of third-party cookies increased during the 16-month observation period (3 → 5 cookies per site).
- The number of third-party cookies used by each service was highly variable (range: 0–21).

Figure 3. Third-party Cookies

![Graph showing the number of third-party cookies used by various health-related websites](image)

Session Recording

About Session Recording (from Blacklight): Session recording is technology that allows a third party to monitor and record all of a user’s behavior on a webpage — including mouse movements, clicks, scrolling down the page, and anything you type into a form even if you don’t click submit. Websites that use the technique compile this data into videos and heat maps that website owners can watch to see how users interact with the site.

Research has shown these practices are insecure and make sensitive user data such as passwords and credit card information more vulnerable to leaks.

- 4/12 websites used session recording technology some point during the study period.
- 1/12 website did so during each observation time point.

<table>
<thead>
<tr>
<th>Table 2. Use of Session Recording</th>
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<tr>
<td>Services</td>
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<td>Bright Heart Health</td>
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<td>SoberGrid</td>
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<td>Workit Health</td>
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Meta (Facebook) Pixel

About Meta (Facebook) Pixel (from Blacklight).

The Facebook [now: Meta] pixel is a piece of code Facebook created that allows other websites to target their visitors later with ads on Facebook. Common actions that can be tracked by pixel include viewing a page or specific content, adding payment information, or making a purchase.

The Pixel connects advertisers with ad services across Meta’s other technologies including Facebook, Messenger, Instagram, WhatsApp, Quest, and Audience Network (which facilitates displaying ads in non-Meta apps). Pixel communicates with Meta even if you are not signed into a Meta account (e.g., Facebook or Instagram), do not have an account with any Meta service, or block cookies.

Privacy researchers have shown how websites can de-anonymize visitors using data collected through Pixel.

It takes approximately 20 steps to install Pixel on an existing website.

Meta policy says that it will filter data that it categorizes as potentially sensitive health-related data, to prevent that data from being used in ads ranking and optimization systems.

Sensitive information includes health-related data about medical conditions, treatment, mental health, and places of treatment or counseling, among others.

It is unclear how Meta filtering of this data occurs.

- 6/12 websites used Meta (Facebook) Pixel at one or more observation timepoints.
- 3/12 websites used Meta (Facebook) Pixel during all observation timepoints.
- Use of the Meta (Facebook) Pixel was variable between and within services.

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25 Giridhari Venkatadri et al., Privacy Risks with Facebook’s PII-based Targeting: Auditing a Data Broker’s Advertising Interface, 2018 IEEE SYMPOSIUM ON SECURITY AND PRIVACY (2018), https://doi.org/10.1109/SP.2018.00014.


- **4/12** websites appeared in the Off-Facebook Activity section: Bicycle Health (through third-party plug-ins Calendly and Typeform); Bright Heart Health; DynamiCare Health; and PursueCare.

- **Most (3/4)** websites that appeared in the Off-Facebook Activity section also had installed the Meta (Facebook) Pixel; **(1/4)** one website was not found to have the Meta (Facebook) Pixel installed but appeared in Off-Facebook Activity.

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<th>6.27.22</th>
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See **Appendix 4** for more information about the Off-Facebook Activity.
Google Analytics

About Google Analytics (from Blacklight): Google Analytics is the most popular website analytics platform in use today. . . . While most of the functionality of this service is to provide developers and website owners with information on how their audience is engaging with their website, the tool also allows the website to make custom audience lists based on user behavior and then target ads to those visitors across the internet using Google Ads and Display & Video 360. Blacklight examines inspected sites for the presence of the tool, not how it is used. Google Analytics policy says that “you may not use Google Analytics for any purpose or in any manner involving Protected Health Information.”

- **10/12** websites used Google Analytics at one or more observation timepoints.
- **7/12** websites used Google Analytics during all observation timepoints.
- Use of Google Analytics was mostly stable within services, and had some variability between services.

<table>
<thead>
<tr>
<th>Table 4. Use of Google Analytics</th>
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<td>SoberGrid</td>
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<tr>
<td>Workit Health</td>
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</tbody>
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30 Best Practices to Avoid Sending Personally Identifiable Information, Google Analytics Help, [https://support.google.com/analytics/answer/6366371?hl=en#zippy=%2Cin-this-article](https://support.google.com/analytics/answer/6366371?hl=en#zippy=%2Cin-this-article) (last accessed October 10, 2022).
About Ad Tech Companies (from Blacklight): The inspected website contacted some well-known actors in the ad-tech industry. Not all of these loaded trackers, so they may be different from those listed in the tests section above. Ad tech companies are used to buy and sell ads and optimize advertising efforts.

- 12/12 websites sent data to Alphabet (Google) at all observation timepoint.
- On average, websites sent data to two ad tech companies.

Figure 4. Ad Tech Companies Sent Data

For more information, see, e.g., What is adtech? ORACLE, https://www.oracle.com/cx/advertising/adtech/ (last accessed Sept. 7, 2022).

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32 For more information, see, e.g., What is adtech? ORACLE, https://www.oracle.com/cx/advertising/adtech/ (last accessed Sept. 7, 2022).
Discussion

The results clearly show that all 12 mHealth OUD websites used technologies capable of collecting and sharing individually identifiable information, including information that someone is seeking or receiving treatment for an opioid use disorder, or is currently in recovery for an opioid use disorder. The potential data collection and sharing varied greatly between and within services over the 16-month observation period, potentially complicating patients’ and providers’ ability to evaluate these services’ privacy standards. Our research is not able to elucidate what information was sent or how the information is being used.

Through further analysis of the Meta (Facebook) Pixel, our research shows that at least four of the 12 websites (or their third-party add-ins, like a scheduling website and form tool used for patient screening) appeared in Off-Facebook Activity. This includes three websites that used the Meta (Facebook) Pixel and one that did not. While our Off-Facebook Activity results show some data, it may not capture the full scope of what data were sent, how the data are used, or if Meta (Facebook) received data other than what was observed in Off-Facebook Activity. We are left with similar questions about the data sent or potentially used by Google Analytics, ad tech companies like Amazon or LinkedIn, or the various companies associated with the third-party cookies installed on these sites.

**While our research was not able to show exactly what information was shared or how it was used, these are important questions to answer.** Notwithstanding the companies’ claims to be private, secure, and confidential, more information is needed to identify exactly whether, how, and why information is being collected and shared with third parties.

More information is also needed about whether and how these OUD mHealth websites and their services comply with existing federal health privacy laws. HIPAA generally prohibits covered healthcare providers, including addiction treatment providers, from sharing information that reasonably identifies an individual and relates to their health – subject to limited exceptions. The stricter privacy protections in Part 2 prohibit covered addiction treatment providers from sharing any information that reasonably identifies someone as seeking or receiving treatment –
subject to even more limited exceptions than HIPAA. Data collection and sharing also violates the principle of anonymity that forms the core of recovery groups like Narcotics Anonymous as well as harm reduction service providers like syringe services programs and overdose prevention sites. Individuals seeking support for addiction or recovery-related services deserve the same standards of confidentiality, privacy, and security regardless of whether they are seeking services online or in person. And they deserve transparency about those standards.
When reached for comment, nine companies did not respond: Bicycle Health; Bright Heart Health; Confidant Health; DynamiCare Health; Kaden; Loosid; Ophelia; SoberGrid; and Workit Health.

**Boulder** responded that it “will never share data about our patients with any third parties, except with the written request and consent of our patients, or otherwise in accordance with HIPAA, 42 CFR Part 2, our privacy policies, and our mission . . . .”
- “We have made the intentional decision as a company to avoid reporting back to, e.g., Google or Meta, on any actions (either on our website or secure app) that might be indicative of actual treatment an individual receives from Boulder (i.e., their status as a Boulder patient).”
- “We limit the use of ad tracking software to website visitors and inquiries only, and all data is anonymized to the greatest extent possible.”

**reset-O’s company, Pear**, responded that “[w]ith respect to Pear websites, we monitor usage but we do not seek and collect personally identifiable information, or PII, from website users, including through the Meta pixel or via Google Analytics.”
- “Any data collected by these pixels is reported on an aggregated and de-identified basis and used for measurement and user experience purposes.”

**PursueCare** responded that its website “does not collect, store, or forward PHI from its visiting users, and patients do not receive care directly on PursueCare’s website.”
- “The website does collect information through HIPAA-compliant third-party web services that we carry Business Associate Agreements (as that is defined by HIPAA) with for initiation of treatment.”
- “Our website does utilize Meta Pixel and Google Analytics for internal reporting purposes. However, we do not share PHI about the users of our website with third parties. ”
- “We do not collect information about people who visit our site to use for advertising purposes, nor do we send user data to ad tech companies or other third parties.”
Conclusion

Our analysis shows that 12 major OUD mHealth websites, hosting thousands of visitors per month, are sharing individually identifying information with third-party advertisers. Information that identifies someone as seeking or receiving treatment for addiction or recovery support is highly sensitive and traditionally subject to strict privacy protections. These privacy protections exist because this information can be used against the individual’s best interest, including in criminal investigation or prosecution, deportation proceedings, family surveillance and child welfare investigations, or discrimination in housing, employment, or benefits. These same privacy considerations apply for information collected by OUD mHealth websites, but despite marketing themselves as private and confidential, they are not meeting the same standard of confidentiality. In order to fulfill their promise of expanding access to quality care, virtual care platforms for OUD treatment and recovery should also meet or exceed the privacy and security standards for in-person care. By shining a light on these issues, we hope that legislators and other policy makers take necessary measures to protect individuals who need treatment and recovery support.
# Appendix 1

## Table 5. OUD mHealth Website Descriptives

<table>
<thead>
<tr>
<th>Services</th>
<th>Mobile App available</th>
<th>Mobile App available</th>
<th>Talk or Behavioral Therapy</th>
<th>MOUD</th>
<th>“Coaches”</th>
<th>MOUD</th>
<th>“Coaches”</th>
<th>MOUD</th>
<th>“Coaches”</th>
<th>MOUD</th>
<th>“Coaches”</th>
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<th>MOUD</th>
<th>“Coaches”</th>
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</tbody>
</table>

*n.b. OUD = Opioid use disorder; MOUD = medication for opioid use disorder; “coaches” covers a range of health coaches and peer recovery coaches, some have certifications associated with them, others do not; <sup>1</sup>an FDA Approved Prescription Digital Therapeutic; <sup>2</sup>Connects people with FDA approved prescription digital therapeutics, but is not one*
## Table 6. OUD mHealth Website Descriptives (continued)

<table>
<thead>
<tr>
<th>Services</th>
<th>Date Founded*</th>
<th>Website Visits (June 2022)</th>
<th>Total Disclosed Funding* (August 2022)</th>
<th>NIH/NIDA Funding (Any; August 2022)</th>
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<tr>
<td>Bicycle Health</td>
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<tr>
<td>Boulder</td>
<td>2017</td>
<td>31.9k</td>
<td>$50.1 mil</td>
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<tr>
<td>Bright Heart Health</td>
<td>2015</td>
<td>24.4k</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Confidant Health</td>
<td>2019</td>
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<td></td>
<td></td>
</tr>
<tr>
<td>DynamiCare Health</td>
<td>2016</td>
<td>&lt;5k</td>
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<tr>
<td>Kaden</td>
<td>2018</td>
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<td>$19.1 mil</td>
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<td>Loosid</td>
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<td>14.4k</td>
<td></td>
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</tr>
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<td>Ophelia</td>
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<td>$67.7 mil</td>
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<td>&lt;5k</td>
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<td>2015</td>
<td>214.3k</td>
<td>$138.2 mil</td>
<td>X</td>
</tr>
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</table>

n.b. OUD = Opioid use disorder; Website visit data from Similarweb (https://www.similarweb.com/); NIH = National Institute of Health; NIDA = National Institute of Drug Abuse; NIH funding through Small Business Innovative Research grants (https://www.sbir.gov/); * Total funding disclosed and date founded data from Crunchbase (https://www.crunchbase.com/); Detailed data for each service available: https://airtable.com/shrqOLXVnzYrV6H0m
Appendix 3

Privacy Analysis: Per Service Results

Bicycle Health

Privacy Summary
- Ad Trackers: Yes
- 3rd-Party Cookies: Yes
- Session Recording: No
- Meta (Facebook) Pixel: Yes
- Google Analytics: Yes
- Some ad tech companies this website interacted with:
  - Alphabet
  - Amazon
  - Microsoft
Boulder

Privacy Summary

- Ad Trackers: Yes
- 3rd-Party Cookies: Yes
- Session Recording: No
- Meta (Facebook) Pixel: No
- Google Analytics: Yes
- Some ad tech companies this website interacted with:
  - Adobe
  - Alphabet
  - Amazon

Graph showing trends from 3.15.21 to 7.28.22:
- Ad-trackers
- 3rd Party Cookies
Privacy Summary

- Ad Trackers: Yes
- 3rd-Party Cookies: Yes
- Session Recording: No
- Meta (Facebook) Pixel: Yes
- Google Analytics: Yes
- Some ad tech companies this website interacted with:
  - Alphabet
Privacy Summary

- Ad Trackers: Yes
- 3rd-Party Cookies: Yes
- Session Recording: Yes
- Meta (Facebook) Pixel: Yes
- Google Analytics: Yes
- Some ad tech companies this website interacted with:
  - Alphabet
  - Amazon

Confidant Health
Privacy Summary

- Ad Trackers: Yes
- 3rd-Party Cookies: Yes
- Session Recording: Yes
- Meta (Facebook) Pixel: Yes
- Google Analytics: No

Some ad tech companies this website interacted with:
- Adobe
- Alphabet
- HotJar
Privacy Summary

- Ad Trackers: Yes
- 3rd-Party Cookies: Yes
- Session Recording: No
- Meta (Facebook) Pixel: No
- Google Analytics: Yes
- Some ad tech companies this website interacted with:
  - Alphabet
LOOSID

Privacy Summary

- Ad Trackers: Yes
- 3rd-Party Cookies: No
- Session Recording: No
- Meta (Facebook) Pixel: No
- Google Analytics: No

(Some ad tech companies this website interacted with:
  • Alphabet
  • Amazon)
Privacy Summary

- Ad Trackers: Yes
- 3rd-Party Cookies: Yes
- Session Recording: Yes
- Meta (Facebook) Pixel: Yes
- Google Analytics: Yes
- Some ad tech companies this website interacted with:
  - Alphabet
  - Amazon
  - LinkedIn
Privacy Summary

- Ad Trackers: Yes
- 3rd-Party Cookies: Yes
- Session Recording: No
- Meta (Facebook) Pixel: Yes
- Google Analytics: Yes
- Some ad tech companies this website interacted with:
  - Alphabet
  - LinkedIn
Privacy Summary

- Ad Trackers: Yes
- 3rd-Party Cookies: Yes
- Session Recording: No
- Meta (Facebook) Pixel: Yes
- Google Analytics: Yes
- Some ad tech companies this website interacted with:
  - Adobe
  - Alphabet
  - Microsoft
Privacy Summary

- Ad Trackers: Yes
- 3rd-Party Cookies: Yes
- Session Recording: No
- Meta (Facebook) Pixel: No
- Google Analytics: Yes
- Some ad tech companies this website interacted with:
  - Alphabet
### Privacy Summary

- Ad Trackers: Yes
- 3rd-Party Cookies: Yes
- Session Recording: Yes
- Meta (Facebook) Pixel: No
- Google Analytics: Yes
- Some ad tech companies this website interacted with:
  - Alphabet
  - Amazon
  - Microsoft
Appendix 4

Off-Facebook Activity

Data Summary

Generated by Bill Wilson on Saturday, August 27, 2022 at 1:56 PM UTC 04:00
Contains data from August 25, 2022 at 9:46 AM to August 27, 2022 at 1:51 PM
A Typeform survey was used by Bicycle Health to capture patient screening/enrollment data. Interacting with the survey software triggered a notification to Meta [Facebook] through the integrated Pixel. The survey asks for personal health information including: state, insurance, readiness to start Suboxone (a medication for opioid use disorder), and a link to book an enrollment call.

*This event was triggered because of selecting “book an enrollment call” on the Bicycle Health homepage.
**Bicycle Health (part 2)**

See description above.

---

**Your Off-Facebook Activity**

Your activity from the businesses and organizations you visit off of Facebook

<table>
<thead>
<tr>
<th>Activity received from calendly.com</th>
</tr>
</thead>
<tbody>
<tr>
<td>ID</td>
</tr>
<tr>
<td>Event</td>
</tr>
<tr>
<td>Received on</td>
</tr>
</tbody>
</table>

Generated by Bill Wilson on Saturday, August 27, 2022 at 1:56 PM UTC-04:00
Contains data from August 25, 2022 at 9:46 AM to August 27, 2022 at 1:51 PM

---

Bicycle Health

*This event was triggered because of selecting “book an enrollment call” on the Bicycle Health homepage.*
Your Off-Facebook Activity
Your activity from the businesses and organizations you visit off of Facebook

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</table>

Generated by Bill Wilson on Saturday, August 27, 2022 at 1:56 PM UTC-04:00
Contains data from August 25, 2022 at 9:46 AM to August 27, 2022 at 1:51 PM
Your Off-Facebook Activity
Your activity from the businesses and organizations you visit off of Facebook

Activity received from pursuecare.com

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<th>ID</th>
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<tbody>
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Generated by Bill Wilson on Saturday, August 27, 2022 at 1:56 PM UTC-04:00
Contains data from August 25, 2022 at 9:46 AM to August 27, 2022 at 1:51 PM
Appendix 5

Select images featuring “privacy”, “security”, or “confidentiality” mentions on the websites covered in this report

Bicycle Health
Get safe and secure online treatments right at home.

We believe addiction treatment should be available to everyone who needs it. And with our technology-driven approach, we work to reach as many people as possible.

Access your medical team via video calls. Lab testing can even be done at your home.
Why Bicycle Health?

Accessible Care team
Our Clinical Support Specialists offer guidance and encouragement every weekday from 9 am to 7 pm via phone, text, or chat on our secure app.

Online Appointments & Easy Communication
Get quick advice from your medical provider on a video call or online chat. No travel or waiting rooms required, and it’s all completely confidential.

Prescription Refills
We promptly send prescriptions via email to a pharmacy near you.

Online support groups
Experiences are more powerful when shared. Our online meetings are a safe space for patients to connect with others in recovery.

Bicycle Health
How does Bicycle Health work?

**A Quick, Free Call**

We'll chat with you about your situation and make sure our program is a good fit for you.

- **Private and secure:** All communication with our care team is completely confidential.
- **Judgment-free:** We've helped thousands of people just like you. We know it's tough, and we're here to support you.
- **Available 24/7:** Call us now, or schedule a future call at a time that's best for you.

**Your First Appointment**

You'll meet your provider and receive your full treatment plan.

- **Convenient:** You don't have to take time off work, travel to a clinic, or sit in a crowded waiting room. We make it easy.
- **Trustworthy:** Our expert clinicians focus solely on treating opioid use disorder. They are the best in their field.
- **Customized:** Your care plan is designed specifically for your needs and goals. It's tailor-made just for you.

**Suboxone, the Same Day**

If you and your medical provider decide Suboxone is the appropriate treatment, pick up your prescription the same day from a nearby pharmacy.

- **Affordable:** We work with your insurance and providers to ensure you pay as little as possible for your medication.
- **FDA-approved:** Suboxone, the gold standard for treating opioid use disorder, is proven to be safe and effective in treating opioid use disorder.
- **Full care:** We can also prescribe comfort meds to ease discomfort during withdrawal.

Get Started
The medicine and support you need, when you need it

No more waiting rooms or long trips to the clinic. We offer whole-person, coordinated outpatient care, including prescriptions for Suboxone and other medications for addiction treatment (MAT), delivered entirely through a secure, private app on your phone.

Learn more about our services →
Partners on the road to your recovery.

*vMAT: Based on the proven Medication Assisted Treatment (MAT) model, Kaden's vMAT™ is virtual. Now treatment is much more accessible so you can stay on track. Each individual care plan is delivered via online sessions by a care team of experienced professionals dedicated to making you feel safe and putting you back in control of your life.

- Secure, password protected
- Facial recognition login
- Ongoing support via talk or text
- Personal care plan timeline tracking
- One-click to online counseling session
- A real path to Recovery
Receive better care, with Kaden.

At Kaden, we take great care in matching you with the right healthcare providers, knowing that the strength of this relationship is essential for your successful recovery.

WHEN SHOULD YOU GET HELP?

**Your Care Team**
Your dedicated care team create your care plan, schedule your appointments, answer your questions and monitor your progress. Recovery is a team effort.

**The Tools**
Custom built, simple to use, digital tools make it easier for you to stay in touch with your care team, track your journey and manage your medication.

**Ongoing Support**
We work with you to make sure you get the help that is right for you. Our counselors help guide and support you on your journey to long-term recovery.

**Our Commitment**
We are committed to delivering a successful treatment plan that respects your privacy, is easily accessible and helps create the life you want to live.
Frequently asked questions

Does Ophelia accept insurance?

What medications does Ophelia prescribe?

Is Ophelia private?

Ophelia is 100% committed to your privacy and confidentiality. We will never share your information with anyone without your permission, including your employer. Read more about our Notice of Privacy Practices here.

For more information, text us at (216) 586-2144
A future free of addiction is in your hands

Recover from addiction at home with medication and online therapy—from the leader in virtual addiction care.

Sign up today

Science-backed care without waiting rooms or waitlists

Workit brings personalized treatment and seamless care to you in the privacy of home. Recover at home, on your own terms and on your own schedule, without spending time away from work and family.
Helping you find a path that works

How does virtual care work?

How do I meet with my doctor?

Do you accept insurance?

How do I get started?

Is the Workit Health program confidential?

Yes, just like your in-person doctor’s office, at Workit Health we take your privacy seriously. Workit Health’s HIPAA-compliant, HITRUST-certified, WCAG-accessible, and SOC 2 Type II compliant program is an industry leader in telehealthcare. We will never release your information to anyone without your permission.
Appendix 6

Meta (Facebook) advertisement mentions of privacy, security, or confidentiality

The Meta (Facebook) Ad Library “provides advertising transparency by offering a comprehensive, searchable collection of all ads currently running from across Meta technologies.” 33

Bicycle Health

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Bicycle Health

Active
Started running on Aug 10, 2022
Platforms
ID: 599654224628937

2 ads use this creative and text
See ad details

Bicycle Health
Sponsored
Suboxone prescribed online in Washington
- Major insurances accepted
- 100% at-home treatment (no waiting rooms, no travel)
- 100% Secure
- Confidential & private

Recovery is about more than getting past withdrawals. We...

“This is what helped me get through my opioid addiction”
Ophelia

Active

Started running on Aug 22, 2022

Platforms  

ID: 1232703150903116

26 ads use this creative and text

See ad details

Ophelia

Sponsored

Ready to kick opioids? Ophelia is at-home, on-demand recovery that's 6x more effective than traditional rehab.
✓ Suboxone scripts in 1-3 days
✓ Insurance accepted
✓ 100% confidential and discreet

Forbes

Meet The Entrepreneur Whose Startup Offering Medication For Quitting Opioids Just Raised $50 Million
Active

Started running on Aug 22, 2022

Platforms

ID: 614049363468106

27 ads use this creative and text

See ad details

Ophelia

Sponsored

Ready to kick opioids? Ophelia is at-home, on-demand recovery that’s 6x more effective than traditional rehab.
✓ Suboxone scripts in 1-3 days
✓ Insurance accepted
✓ 100% confidential and discreet

AS SEEN IN:

THE WASHINGTON POST
Inc.
Forbes
The New York Times
MIT Technology Review

Forbes
About the Page

Ophelia

@opheliahealth
1,185 likes • Medical & health

@ophelia
1,273 followers

More info
Evidence-based, accessible, and judgment-free approach to opioid use disorder — right in the privacy of your own home.
Workit Health

Active

Started running on Aug 25, 2022

Platforms 🌐 📱

ID: 599844498354277

3 ads use this creative and text

See ad details

Workit Health

Sponsored

Science-backed addiction care without judgment.

- FDA-approved medication for opioids or alcohol
- Virtual treatment from the privacy of home
- Trusted by major insurance providers

Not everyone has the option to go to inpatient rehab. Workit gives you...
About the ad

Multiple versions of this ad

Workit Health
Sponsored
ID: 604953778786139

Ready to get your life back? Workit Health can help!

- FDA-approved medication
- 100% virtual treatment (all from home—no clinics!)
- Affordable and discreet
Workit Health

About the ad

Multiple versions of this ad 1

Workit Health
Sponsored
ID: 599844498354277

Science-backed addiction care without judgment.

- FDA-approved medication for opioids or alcohol
- Virtual treatment from the privacy of home
- Trusted by major insurance providers

Not everyone has the option to go to inpatient rehab. Workit gives you the tools you need to recover in the privacy of your home.

FB ME
Expert Addiction Care Without the Waiting Room
Learn more

Additional assets from this ad
About the ad

Multiple versions of this ad

Workit Health
Sponsored
ID: 5378542095569428

Online medication-assisted treatment on your schedule and on your phone.
- Affordable - Major insurance accepted!
- Accessible - 100% from your phone
- Private - Confidential and HIPAA-compliant

A boxone?

Addiction care isn’t all. Workit Health personalizes treatment to your own life and any diseases, treated with online therapy.

The right care when you need it most.
- Medication-Assisted Treatment
- 100% Virtual Online Therapy
- Discreet and Affordable

Learn More
- FB.ME
- 100% Virtual Addiction Care
Workit Health

About the Page

Workit Health

@workithealth
7,607 likes • Addiction Resources Center

@workithealth
6,900 followers

More info

With Workit Health, compassionate clinical and counseling care that’s covered by insurance is at your fingertips. Our experts treat addiction (opioids, alcohol, meth, cocaine) and mental health (anxiety, depression) — all from the privacy of home.