NEOAHEC Privacy Policy

Northeast Oregon Area Health Education Center (NEOAHEC)

Effective Date: August 19, 2026 | **Last Updated:** May 11, 2026 | **Owner:** NEOAHEC Privacy Officer

1. Introduction

NEOAHEC is an independent 501(c)(3) nonprofit organization affiliated with Oregon Health & Science University (OHSU). Since 1991, we have served eleven counties in eastern Oregon — Baker, Gilliam, Hood River, Malheur, Morrow, Sherman, Umatilla, Union, Wallowa, Wasco, and Wheeler — with extension services to Grant and Harney Counties. Our mission is to educate and inspire students and professionals to build a sustainable healthcare community for eastern Oregon.

This Privacy Policy describes how **NEOAHEC** ("we," "us," or "our") collects, uses, shares, retains, and protects information from individuals who visit our website at https://www.neoahec.org, apply to or participate in our programs, communicate with us, or otherwise interact with our services. This policy applies to all such interactions regardless of the participant's state of residence.

2. Who This Policy Covers

This policy applies to:

- Visitors to our website.
- Applicants and participants in NEOAHEC programs, including MedQuest Health Career Exploration Camp, Future Health Professionals of Oregon (FHPO), the NEOAHEC Pre-Health Society, the Health Speaker Series, and other current and future programs.
- Parents, guardians, and emergency contacts of minor participants.
- Volunteers, mentors, camp counselors, job-shadow hosts, and program partners.
- Donors, subscribers, event attendees, and other supporters.

Some participants reside outside Oregon (commonly in Washington, Idaho, or California). This policy applies to all participants, and we honor applicable state-specific rights as described in Section 11.

3. Information We Collect

3.1 Information You Provide Directly

- **Contact information:** name, mailing address, email, phone number, parent/guardian contact information for minors.

- **Demographic information:** date of birth, age, race and ethnicity, gender identity, primary language, county of residence, household income range (when relevant to scholarship eligibility), and first-generation college status.
- **Academic information:** school name, grade level, GPA, transcripts, coursework, standardized test information (when voluntarily provided), college plans, career interests, and letters of recommendation.
- **Program participation:** applications, registration data, essays, attendance, completion records, job-shadow placements, evaluations, and certificates.
- **Health and safety information (residential and in-person programs only):** dietary restrictions, allergies, medications, accommodations, emergency medical contact, insurance information, signed health forms, and any condition that may affect participation.
- **Communications:** emails, letters, messages, survey responses, and information you submit through forms.
- **Career outcomes for longitudinal tracking:** post-program education, credentials earned, employment history in health-related fields, and updated contact information you provide over time.

3.2 Information Collected Automatically When You Visit Our Website

Our website collects limited technical information automatically, including IP address, device type, browser type, operating system, referring URL, pages visited, and access times. We use this information to operate the site, troubleshoot issues, and understand general usage trends. *We do not currently use advertising cookies, tracking pixels, or behavioral profiling tools. If we adopt such technologies in the future, we will update this policy and obtain any required consents before doing so.*

3.3 Information From Third Parties

- Schools and school counselors, where they help verify enrollment, grades, or recommend students.
- Job-shadow host sites and clinical preceptors, which may confirm completion of placements.
- OHSU systems, where data is shared as part of our affiliation and joint programs.
- Funders and grantmakers, where they share applicant or beneficiary data necessary to administer a funded program.

REVIEW NOTE: *Confirm with the website host (and any analytics or marketing tools you currently use) whether tracking cookies, Google Analytics, Facebook Pixel, or similar tools are deployed on neoahec.org. If yes, add a Cookies / Tracking Technologies section. As written, this policy assumes minimal tracking only.*

4. How We Use Your Information

We use the information described above for the following purposes:

- Process applications, verify eligibility, and administer programs.
- Communicate with applicants, participants, parents, and guardians regarding logistics, acceptances, schedules, and program updates.
- Ensure participant health and safety during in-person and residential programs.
- Measure educational and career outcomes, evaluate program effectiveness, and conduct internal and external program evaluation, including longitudinal outcome tracking.
- Fulfill reporting obligations to funders such as the U.S. Health Resources and Services Administration (HRSA), the State of Oregon, OHSU, and private foundations. Whenever possible, we report in aggregate or de-identified form.
- Maintain alumni networks and support pathway connections.
- Respond to inquiries and requests.
- Improve our website, programs, and services.
- Comply with legal obligations, including mandatory reporting under Oregon law.
- Protect the rights, property, or safety of participants, staff, and the public.

5. Legal Bases for Processing

Where required by law, we rely on one or more of the following bases to process your information:

- **Consent.** You (or, for minors, a parent or guardian) have given us informed consent for a specific purpose.
- **Performance of services.** Processing is necessary to administer programs and services you have requested.
- **Legal obligation.** Processing is required by federal, state, or local law, including grant compliance and mandatory reporting.
- **Legitimate interest.** Processing supports the educational mission and evaluation of NEOAHEC programs in a manner consistent with participant expectations.
- **Vital interest.** Processing is necessary to protect the health or life of a participant (for example, emergency medical response).

6. How We Share Information

6.1 With Service Providers

We use vendors to deliver our services. These vendors process information only on our instructions and under written agreements that require confidentiality and appropriate safeguards. Categories include:

- Customer relationship management and program management: Salesforce, Inc. (Salesforce Nonprofit Cloud), which serves as our system of record for participant data.
- Email, communications, and survey platforms.
- Web hosting and website analytics providers.
- Accounting, payroll, and IT services.

6.2 With OHSU

As an organization affiliated with Oregon Health & Science University, we share certain information with OHSU for joint program administration, statewide AHEC reporting, and grant compliance. OHSU's use of that data is governed by OHSU's own privacy practices. See https://www.ohsu.edu for OHSU's privacy and HIPAA notices.

6.3 With Funders and Grant Reporters

We report to funders such as HRSA, the Oregon Office of Rural Health, and private foundations to demonstrate program impact. Reporting is generally aggregated or de-identified. Where a funder requires individual-level data, we limit the disclosure to the minimum necessary and inform participants where practical.

6.4 With Partner Schools, Host Sites, and Mentors

To place participants in job shadows, clinical experiences, and academic programs, we may share limited information (typically name, school, grade level, areas of interest, and any necessary accommodations) with partner schools, host facilities, mentors, and program staff.

6.5 To Comply With Law and Protect Rights

We may disclose information when required by law, court order, or valid legal process; to respond to lawful requests by public authorities; to enforce our Terms of Service; or to protect the safety, rights, or property of participants, staff, the public, or NEOAHEC. NEOAHEC staff are mandatory reporters under Oregon law (ORS 419B.005 et seq.) and will report suspected child abuse or neglect to the appropriate authorities.

6.6 What We Do Not Do

- We do not sell personal information.
- We do not share personal information for third-party advertising.
- We do not engage in profiling that produces legal or similarly significant effects on participants.

- We do not knowingly share data with anyone outside the categories listed in this section.

7. Children's Privacy

Important: NEOAHEC offers programming for participants of varying ages, including some middle-school and elementary-age children. We take additional care with information about anyone under 18, and especially under 13.

7.1 Children Under 13 (COPPA)

We comply with the Children's Online Privacy Protection Act (COPPA, 15 U.S.C. § 6501 et seq.). We do not knowingly collect personal information online from a child under 13 without first obtaining verifiable parental consent. When we offer programs serving children under 13, we:

- Provide parents with a clear notice describing what information will be collected, how it will be used, and with whom it will be shared.
- Obtain verifiable parental consent before collecting personal information, using methods such as a signed paper or PDF consent form, a phone confirmation with identity verification, or in-person consent collected by staff.
- Collect only the personal information reasonably necessary for the child to participate.
- Allow parents to review their child's information, request corrections, or request deletion.
- Allow parents to refuse further collection or use of their child's information.

If you believe we have collected information from a child under 13 without proper parental consent, please contact us at info@neoahec.org and we will promptly investigate and, if appropriate, delete the information.

7.2 Minors Ages 13 to 17

For minors aged 13 through 17, we require parent or guardian consent for program participation. The Oregon Consumer Privacy Act provides additional protections for minors:

- Effective January 1, 2026, controllers are prohibited from selling the personal information of minors aged 13 through 16, using such information for targeted advertising, or profiling them with legal or similarly significant effects — even with consent.
- Opt-in consent is required for targeted advertising, the sale of personal data, or certain profiling activities involving minors aged 13 through 15.

NEOAHEC does not engage in any of these prohibited or consent-required activities for minors of any age.

7.3 Health and Safety Information for Camps and In-Person Programs

For residential or in-person programs (such as MedQuest), we collect health information necessary to keep participants safe. This information is stored securely with restricted access, is used only for health and safety purposes during the program, and is deleted or de-identified after the program concludes, except where a longer retention is required for incident documentation, insurance, or law.

8. Health Information

NEOAHEC is not a covered entity under the federal Health Insurance Portability and Accountability Act (HIPAA), and information you share with us is generally not protected health information (PHI) under HIPAA. We nonetheless treat health-related information you provide — such as allergies, medications, accommodations, and emergency contacts — as sensitive data and limit access to it within our organization.

If you are a Washington resident, the Washington My Health My Data Act (MHMDA) may classify certain information we collect as *consumer health data*. For Washington residents, please see Section 11.3.

9. Data Retention

NEOAHEC tracks the long-term educational and career outcomes of program alumni. We retain participant records indefinitely for purposes of longitudinal program evaluation, alumni engagement, and reporting, subject to the following safeguards:

- **Annual review.** At least once per year, our Privacy Officer reviews retained records to identify and remove information that is no longer necessary, that belongs to individuals who have requested deletion, or that has become inaccurate.
- **Right to request deletion.** Participants and, where applicable, parents/guardians may request deletion of their information at any time (see Section 11). We will honor requests subject to legitimate obligations to retain certain records.
- **Health information.** Health information collected for in-person programs is retained only as long as needed for safety, insurance, or incident documentation purposes.
- **Inactive participants.** Records for individuals we have been unable to contact for an extended period may be minimized to reduce retained personal information while preserving aggregate program metrics.

REVIEW NOTE: *Confirm whether any specific grant or funder requires a defined minimum or maximum retention period (HRSA, OHSU, foundations). If so, list those specific obligations here so the policy reflects actual practice.*

10. Data Security

We use reasonable administrative, technical, and physical safeguards designed to protect the information we collect, including:

- Salesforce Nonprofit Cloud as our primary system of record, with encryption in transit and at rest.
- Role-based access controls and the principle of least privilege.
- Multi-factor authentication for staff and authorized users.
- Annual staff training on privacy and data handling.
- Secure storage of any paper records, with prompt scanning and destruction where appropriate.
- A documented incident response process that includes evaluating and notifying affected individuals as required by Oregon's data breach law (ORS 646A.604) and other applicable laws.

No method of transmission or storage is 100% secure. We cannot guarantee absolute security, but we work diligently to protect your information.

11. Your Privacy Rights

Depending on where you live, you may have specific rights regarding your personal information. NEOAHEC honors the following baseline rights for all participants, regardless of state of residence, in addition to the state-specific rights below.

11.1 Rights We Provide to All Participants

- **Access.** Request a copy of the personal information we hold about you.
- **Correction.** Request that we correct inaccurate or incomplete information.
- **Deletion.** Request that we delete your information, subject to legal and grant-related retention obligations.
- **Portability.** Request a copy of your information in a portable format where feasible.
- **Withdrawal of consent.** Withdraw consent at any time for processing based on consent. Withdrawal does not affect prior lawful processing.
- **Non-discrimination.** We will not deny services, charge different prices, or provide a different level of quality because you exercise these rights, except where the request makes the service impossible.
- **Appeals.** If we deny a request, you may appeal by contacting the Privacy Officer, who will respond within 45 days.

11.2 Oregon Residents (Oregon Consumer Privacy Act)

The Oregon Consumer Privacy Act (OCPA) applies to qualifying nonprofits as of July 1, 2025. NEOAHEC follows OCPA practices for all Oregon residents. In addition to the rights above, Oregon residents may:

- Confirm whether we are processing personal data about them.
- Obtain a list of specific third parties (other than natural persons) to which we have disclosed personal data.
- Opt out of (i) targeted advertising, (ii) the sale of personal data, and (iii) profiling that produces legal or similarly significant effects. NEOAHEC does not engage in these activities.

If you are dissatisfied with our response, you may file a complaint with the Oregon Department of Justice Consumer Protection Division at https://www.doj.state.or.us.

11.3 Washington Residents (My Health My Data Act)

If you reside in Washington and we collect consumer health data about you, the Washington My Health My Data Act provides additional rights:

- We collect consumer health data only with your consent (or, for minors, parental consent).
- We do not sell consumer health data.
- You may withdraw consent, access, or request deletion of your consumer health data at any time.

For Washington-specific requests, contact us at info@neoahec.org and identify yourself as a Washington resident.

11.4 California Residents

The California Consumer Privacy Act (CCPA) generally exempts nonprofit organizations. As a courtesy, NEOAHEC extends substantially the same access, correction, and deletion rights described in Section 11.1 to California residents. California residents may submit requests through the contact information in Section 14.

11.5 Idaho Residents

Idaho does not currently have a comprehensive consumer privacy statute applicable to NEOAHEC. We extend the baseline rights described in Section 11.1 to Idaho residents.

11.6 How to Exercise Your Rights

Submit requests by email to info@neoahec.org with the subject line “Privacy Request,” or by mail to the address in Section 14. Include your name, the program(s) you participated in, and a description of your request. We may need to verify your identity, and we will respond within 45 days. We may extend that timeframe once by an additional 45 days when reasonably necessary, with notice to you.

Parents and guardians may exercise these rights on behalf of minor participants.

12. Out-of-State Participants and Data Transfer

Some participants reside outside Oregon. By participating in NEOAHEC programs or otherwise providing us with information, you understand that your information may be transferred to and stored on systems located in Oregon and in the United States more generally, and processed by Salesforce and other vendors that operate across multiple states. We apply Oregon's privacy and security standards as a floor for all participants, while also honoring the additional rights described above for residents of Washington, California, and other states.

13. Links to Third-Party Sites

Our website may link to OHSU, partner schools, host facilities, scholarship providers, and other third-party resources. We are not responsible for the privacy practices of those sites. We encourage you to review the privacy policies of any third-party sites you visit.

14. Contact Us

NEOAHEC Privacy Officer Email: info@neoahec.org **Website:** https://www.neoahec.org **Mailing address:** Northeast Oregon Area Health Education Center, La Grande, Oregon

> **REVIEW NOTE:** *Designate a specific Privacy Officer (name, title, direct email) and confirm the full street address for the policy. The generic info@ address is fine for intake; assign one staff member as accountable owner for privacy requests.*

15. Changes to This Policy

We may update this Privacy Policy from time to time. The "Last Updated" date at the top of this policy reflects the most recent revision. Where changes are material, we will provide additional notice (such as a website banner, email to participants on file, or in-program announcement). Your continued use of our website or programs after the effective date of an updated policy constitutes acceptance of the changes.

16. Approval and Version Control

Approved by: NEOAHEC Executive Director and Board of Directors **Effective Date:** August 19, 2026

Next Scheduled Review: Annually, or sooner if law or practice changes. **Version:** 1.0

REVIEW NOTE: *This document has been drafted as a starting point informed by Oregon, Washington, California, and federal law. It has not been reviewed by counsel. Before publishing, have it reviewed by an attorney familiar with Oregon and federal privacy law, COPPA, the OCPA (including 2026 minor-protection amendments), and the Washington My Health My Data Act. Confirm contact information, retention schedules tied to specific grants, vendor list, and any analytics tools in use.*