

ELECTRONIC RECORDS DISCLOSURE

I keep and store records for each client in a record-keeping system produced and maintained by Google Apps for Business (a paid version of Google's suite of office tools). This system is "cloud-based," meaning the records are stored on servers which are connected to the Internet.

Additionally, I use Office Ally, a web-based medical claims clearinghouse to submit claims to insurance providers. I use Acuity Scheduling for my online appointment scheduling software, which, with your consent, will automatically email appointment confirmations and reminders to you for your convenience.

Here are the ways in which the security of these records is maintained:

- I have entered into **HIPAA Business Associate Agreements** with Google Apps for Business, Office Ally, and Acuity Scheduling. Because of our agreements, these three companies are obligated by federal law to protect these records from unauthorized use or disclosure.
- The computers on which these records are stored are kept in secure data centers, where various physical security measures are used to maintain the protection of the computers from physical access by unauthorized persons.
- Google Apps for Work, Office Ally, and Acuity Scheduling employ various technical security measures to maintain the protection of these records from unauthorized use or disclosure.

I have my own security measures for protecting the devices that I use to access these records:

- On computers, I employ firewalls, antivirus software, passwords, and disk encryption to protect the computer, and thus protect the records, from unauthorized access.
- With mobile devices, I use passwords, remote tracking, and remote wipe to maintain the security of the device and prevent unauthorized persons from using it to access my records.

Here are things to keep in mind about my record-keeping system:

- While these companies and I both use security measures to protect these records, their security cannot be guaranteed, just as the security of paper records cannot be completely guaranteed.
- Some workforce members (such as engineers or administrators) at Google Apps for Business, Office Ally, and Acuity Scheduling may have the ability to access these records for the purpose of maintaining the system itself. As HIPAA Business Associates, these companies are all obligated by law to train their staff on the proper maintenance of confidential records and to prevent misuse or unauthorized disclosure of these records. However, as mentioned above, this protection cannot be completely guaranteed.
- These companies keep a log of my transactions with the system for various purposes, including maintaining the integrity of the records and allowing for security audits.

Please inquire if you would like more information, and I would be happy to provide you with the privacy and security policies of my HIPAA Business Associates.