

## **HIPAA Policy for**

### **DentalTNT™/MedTNT™ Services & Products**

At BahBam Software, LLC, including our products, namely, **DentalTNT™/MedTNT™**, we are committed to maintaining the confidentiality of information entrusted to us by our clients, Business Associates/Subcontractor, especially individually identifiable personal and health information, such as names, addresses, and Protected Health Information (“PHI”).

**DentalTNT™/MedTNT™ enables our customers to provide, track, and trace medical devices and required materials pursuant to the U. S. Food & Drug Administration federal code of regulation 21 CFR 821 (see [www.fda.gov](http://www.fda.gov)).**

**DentalTNT™/MedTNT™** protects the confidentiality of information it receives by adhering to the requirements of the HIPAA Privacy Rule and the HIPAA Security Rule. The Privacy Rule governs the acquisition, storage, transfer and retention of PHI, in both electronic and paper formats. The Security Rule covers all information acquired, maintained or transferred electronically.

We comply with all requisite business associate obligations under HIPAA/HITECH, enabling us to provide the highest level of service to our health care provider customers.

**DentalTNT™/MedTNT™** follows the policies and practices it has documented in its HIPAA Privacy Manual and in its HIPAA Security Compliance Plan. These documents cover areas such as:

- Physical security of electronic equipment used to acquire and store PHI
- Technical safeguards to prevent unauthorized access to PHI
- Training and awareness for staff members who have access to PHI

We respect the privacy of personal health information and take securing all PHI data seriously. **DentalTNT™/MedTNT™**'s services are HIPAA ready and enable practices using the system to comply with its obligations as a Covered Entity.

**DentalTNT™/MedTNT™** products are HIPAA-ready services that include:

- Track and trace of medical devices
- Automated workflow processes

IN NO EVENT IS BAHBAM SOFTWARE RESPONSIBLE TO NOTIFY ANY ENTITY OR PERSONS REGARDING ANY RECALL OF ANY DEVICES OR MATERIALS.

**Use and Disclosures of Health Information:** **DentalTNT™/MedTNT™** assures the appropriate use and disclosure of PHI is done in the normal course of business and appropriately based on the contracts with clients. **DentalTNT™/MedTNT™** will assure appropriate and adequate safeguards are established to protect customers' patient information from unauthorized use and disclosures, where use is defined as the sharing, employment, application, utilization, examination, or analysis of information within an entity that maintains such information, and where disclosure is defined

as release, transfer, provision of, access to, or divulging in any other manner of information outside the entity holding the information.

**Breach Notification:** Breach notification will be carried out in compliance with the American Recovery and Reinvestment Act (ARRA)/Health Information Technology Economic and Clinical Health Act (HITECH), Modifications to the HIPAA Privacy, Security Enforcement, and Breach Notification Rules under the HITCH Act (Omnibus Rule).

**HIPAA Privacy Practices Policy & Procedures:** DentalTNT™/MedTNT™ acknowledges the need for practices with accounting of disclosure, electronic access to PHI, fundraising and PHI, sale of PHI, research and PHI, and marketing and PHI. Through the normal course of business, DentalTNT™/MedTNT™ does not take part of any activities that would fall under the classifications of: Fundraising Activities; Sale of PHI; Marketing and Research and PHI.

**Risk Analysis and Management:** DentalTNT™/MedTNT™ is focused on protecting the confidentiality, integrity, and accessibility of the PHI. DentalTNT™/MedTNT™ will regularly and timely review threats and vulnerabilities to their organization and systems focused on protecting the confidentiality, integrity, and accessibility of PHI. DentalTNT™/MedTNT™ will take the proper steps to mitigate and reduce the risks to the organization and the PHI maintained.

**Workforce & Information System Security:** DentalTNT™/MedTNT™ is committed to proper protection of all uses and disclosures of PHI that it stores and maintains on behalf of a covered entity, and accordingly it is committed to hold all workforce members responsible for the proper protection of privacy and security requirements. DentalTNT™/MedTNT™ will assure that the workforce members logging into the electronic systems that contain PHI are only looking at information needed to complete the daily operational work. DentalTNT™/MedTNT™ does not have access to the information of each of the individual organizations that are in the system software. DentalTNT™/MedTNT™ is focused on protection of the physical components of the business that store and maintain PHI for the organization. DentalTNT™/MedTNT™ assures that limitations are put on the ability to provide physical limitations to any PHI. DentalTNT™/MedTNT™ only allows the appropriate access to systems based on business need and client responsibility.

**Security Incident & Contingency Plan:** To protect all electronic media used for patient care, BahBam Software, LLC will properly report and respond to all potential security incidents that occur within the organization. The contingency plan for DentalTNT™/MedTNT™ system will focus on data backup, disaster recovery, emergency mode operation plan, testing and revision, and application and data criticality analysis. DentalTNT™/MedTNT™ will assure adequate controls are in place through regular review and evaluation to protect the confidentiality, integrity, and availability of electronic PHI.

**Business Associate:** DentalTNT™/MedTNT™ will enter into and maintain a process to assure the information shared and used by subcontractors is properly protected and safeguarded as required in the HIPAA regulation. DentalTNT™/MedTNT™ will enter into a written business associate agreement with all subcontractors that create, receive, maintain, or transmit PHI to support the business operations of DentalTNT™/MedTNT™. Business Associates/Subcontractors will be obligated to effectively maintain the privacy and security of PHI as required by HIPAA and HITECH.

**Security Rule:** DentalTNT™/MedTNT™ is required by the HIPAA Security Rule to assure that the integrity to the data that it stores and maintains has not been altered or destroyed in an unauthorized manner. DentalTNT™/MedTNT™ will protect all electronic PHI that it stores, maintains, and transmits from improper alteration and destruction by implementing a combination of policy and technical solutions, in the maintenance, retention, and eventual destruction/disposal of PHI.

**HIPAA Security Officer:** DentalTNT™/MedTNT™ will assure that an individual is appointed to be the organization's HIPAA Security officer. The Security Officer is responsible for the oversight and management of the organization's compliance with the HIPAA regulations. The Security Officer is the individual who is responsible for assuring that the development, awareness, and enforcement of all the HIPAA policy and procedures established meet requirements.

**Timely Updates:** DentalTNT™/MedTNT™ will assure timely and appropriate policies and procedures in order to comply with the HIPAA Privacy and Security Regulations; accordingly, documentation will be updated, maintained, and stored in accordance with the regulations.

If you have any questions or concerns regarding this notice please contact:

BahBam Software, LLC, Attn: Security Officer, 109 Bushaway Road, Suite 300, Wayzata MN 55391; or email at [care@dentalnt.com](mailto:care@dentalnt.com).

Last updated: 9/30/2016