**HIPAA Compliance Status Questionnaire**

**Privacy & Compliance Officer: Internal Review**

The following Questionnaire will help the Trialomics, Inc. Privacy & Compliance Officer to ensure compliance with all HIPAA statutes.

**Part I. Trialomics, Inc. and Protected Health Information:**

| What type(s) of service does Trialomics, Inc. provide to Covered Entity? | We offer cloud services and mobile/web development services to covered entities and other business associates. In the cloud services we have the option of storing ePHI data. |
| --- | --- |
| Does the services Trialomics, Inc. provide to Covered Entity require the use or disclosure by, or to Trialomics, Inc., of PHI? | Yes |
| When did Trialomics, Inc. sign the last BA agreement? | 10/20/2020 |
| Where are Trialomics, Inc. services carried out/performed? | Cloud services are located in AWS. Workforce is distributed. |
| What type of PHI does Trialomics, Inc. access? | Currently phone numbers, email addresses, ip addresses, and geographical information. |
| What form of PHI does Trialomics, Inc. have access to or utilize in providing services to Covered Entity? | JSON |
| What quantity of PHI does Trialomics, Inc. access? | <500 patients |
| How does Trialomics, Inc. access PHI? | Via applications used by medical professionals, trial coordinators, and patients. |
| How does Trialomics, Inc. store PHI? | Encrypted, in AWS accounts. |
| When did Trialomics, Inc. complete its last HIPAA Risk Assessment? | 10/13/2020 |
| If Trialomics, Inc. uses PHI off-site, does Trialomics, Inc. access PHI through electronic means? | Yes |
| -If so, what safeguards are in place to protect the PHI? | Many, see Risk Analysis Results |
| Is any PHI maintained on portable media (flash drives or external hard-drives)? | No |
| How many employees does Trialomics, Inc. have that have access to or use of PHI? | 1 |
| At which locations do the employees access/ use PHI? | Virtually via accessing servers located in the AWS cloud. |
| Does Trialomics, Inc. use the PHI for purposes other than those for which it is a Business Associate? | No |
| -If yes, list the purposes for which data is being used or disclosed outside the purposes of the BAA? |  |
| Does Trialomics, Inc. engage in any marketing activities in which PHI is used or disclosed in any manner? | No |
| Does Trialomics, Inc. engage in any research activities in which PHI is used or disclosed? | No |
| -If so, please provide a detailed explanation of the policies and procedures in place regarding the use or disclosure of PHI for research purposes or append a copy of such policies and procedures to Trialomics, Inc.’s response. |  |
| Does Trialomics, Inc. have any processes or procedures regarding the de-identification of PHI? | No |
| -If so, please provide a detailed explanation or append a copy to this response. |  |
| Does Trialomics, Inc. use subcontractors in providing services to Covered Entity under Trialomics, Inc.’s agreement with Covered Entity? | Yes |
| -If yes, does Trialomics, Inc. have a chain-of-custody agreement or other written agreement that requires the subcontractor to meet the requirements of HIPAA? |  |
| Are any of the services Trialomics, Inc. perform done outside of the jurisdiction of the United States? | Yes |
| -If yes, please list all other jurisdictions in which services are performed for Covered Entity. | Europe |
| Does Trialomics, Inc. store or maintain PHI for Covered Entity? | Yes |
| -If yes, please describe the location(s) and manner in which PHI is stored or maintained and the security safeguards Trialomics, Inc. have in place at each location. | Encrypted in AWS cloud environment. See Risk Analysis Results |
| Do workforce members have direct contact with patients? | No |
| Have Trialomics, Inc. employees or subcontractors ever been involved in a data breach involving PHI? | No |
| -If yes, how many breaches and how many patients were affected? |  |
| What steps were taken to mitigate the consequences and notify the affected patients and Covered Entity of the breach? |  |

**Part II. HIPAA Compliance Checklist**

| Does Trialomics, Inc. have a HIPAA Compliance Program in place? | Yes |
| --- | --- |
| -If so, when was the Program last updated or reviewed? | 10/14/2020 |
| Does Trialomics, Inc. include separate policies on Privacy and Security pursuant to the HITECH statute and Rules? | Yes |
| -If so, please provide details on the same, including date created, type of policies and amendments. | Available upon request. Policies include date information. |
| Has Trialomics, Inc. conducted a HIPAA Risk Analysis for Security and Privacy? | Yes |
| When was it conducted and who performed it? | 10/13/2020 Brig Mecham and Megan Beck |
| Has Trialomics, Inc. done vulnerability assessments of the Trialomics, Inc. network? | Yes |
| -If so, please provide details on the same, including date created, type of policies and amendments. | 10/13/2020, see policies. |
| Is Trialomics, Inc. required to create a Contingency Plan? | Yes |
| -If yes, has Trialomics, Inc. created a Contingency Plan? | Yes |
| -Has Trialomics, Inc. conducted an Application & Data Criticality Analysis? (Provide copy or access location) | Periodic Task Ledger and related policy and procedure documents. |
| -Has Trialomics, Inc. created a Disaster Recovery Plan? (Provide copy or access location.) | Periodic Task Ledger and related policy and procedure documents. |
| -Has Trialomics, Inc. created a Data Backup Plan? (Provide copy or access location.) | Periodic Task Ledger and related policy and procedure documents. |
| -Has Trialomics, Inc. created an Emergency Mode of Operations Plan? (Provide copy or access location) | Periodic Task Ledger and related policy and procedure documents. |
| Has Trialomics, Inc. created testing and revision procedures? | Yes |
| When was the last time Trialomics, Inc. did an audit to determine HIPAA compliance status? | 10/14/2020 |
| Based on Trialomics, Inc.’s knowledge, provide the date in which Trialomics, Inc. became HIPAA complaint? | 1/1/2020 |
| How often is staff trained & informed about Trialomics, Inc.’s HIPAA policies and programs? | Upon hire, annually, as policies change, and as needed. |
| When did Trialomics, Inc. conduct last staff training on HIPAA? | 6/1/2020 |
| Which workforce members receive HIPAA training? | Brig Mecham, Megan Beck |
| Were the HITECH updates to HIPAA included in the training? | Yes |
| Have other workforce members of Trialomics, Inc. undergone comprehensive HIPAA training? | No |
| -If so, please list their name(s) and their title(s): | N/A |

**Part III. Privacy & Compliance Officer**

| Has Trialomics, Inc. appointed a Privacy and/or Security Officer? | Yes, both |
| --- | --- |
| -If so, please provide their name and email address. | Brig Mecham, brig@trialomics.com |
| Is the Privacy & Compliance Officer an employee of Trialomics, Inc. organization? | Yes |
| -If yes, is there a written job description regarding the Privacy & Compliance Officer’s duties and responsibilities? | Yes |
| -If no, is there a written contract between Trialomics, Inc. and the Privacy & Compliance Officer regarding his/her duties and responsibilities? | N/A |
| Does Trialomics, Inc.’s Privacy & Compliance Officer hold any HIPAA and/or Health care certifications, such as Certified HIPAA Privacy Security Expert (CHPSE), Certification in Healthcare Compliance (CHC), Certification in Healthcare Privacy Compliance (CHPC) or other similar certification? | No |
| -If yes, please list all certifications held and date of issuance. | N/A |
| -If not certified in HIPAA compliance, what comprehensive HIPAA training has been undertaken by the HIPAA Privacy & Compliance Officer? (Please provide date) | HIPAA awareness for Business Associates, May 11, 2020 |
| Who handles Trialomics, Inc.’s service calls for equipment utilized in the business? | Brig Mecham |

**Part IV. Verification**

By signing this document, the Privacy & Compliance Officer has answered all questions honestly and to the best of his/her knowledge.

Signed by HIPAA Compliance Officer: 

Name and Date: Brig Mecham, 10/13/2020

Signed by Chief Executive Officer / Chief Financial Officer: 

Name and Date: Brig Mecham 10/13/2020