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To:

Subject: Good Reminder
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Good afternoon – This is a good reminder of the importance to encrypt ALL devices that are used to store ePHI. Although the hard drive in this case was in a locked closet, we know that OCR has stated that it considers storing ePHI on an unencrypted device to be reckless disregard for the safety of the ePHI on the device. It's probably a safe bet that OCR will impose a large penalty against this covered entity for this violation.

Denton Heart Group, with six sites serving patients in the greater Dallas metropolitan area in January learned that an **external hard drive was stolen from a locked closet**.

The hard drive held backup data and patient information from the practice's electronic health record system. A total of 21,665 patients were affected; those with compromised Social Security numbers and/or driver's licenses were offered one year of credit monitoring and identity protection services through Experian.

Protected health information that may have been compromised includes demographic data, **driver's license numbers, Social Security numbers, medical record numbers, clinic account numbers, insurance information and/or policy numbers, physician names and clinical information**—such as diagnosis, conditions, lab results and medications—from records between 2009 and 2016.

To date, Denton Heart Group does not believe that compromised data has been “further disclosed or used by any other unauthorized individuals or entities,” according to a notice provided to patients. Corrective actions have been taken to prevent similar incidents going forward, and the security of computing devices in the practice is being re-evaluated, the group practice reports. Denton Heart Group is part of the Baylor Scott & White delivery system.

Thank you for all you do for our HIPAA Compliance program!

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