

Title: Privacy Policy – Storage, Safeguards, and Disposal Policy No. 002

Effective Date: Next Review Date:

Developed by: The Center for Health and Wellness Law, LLC On: 2022

Last Revised by: The Center for Health and Wellness Law, LLC On: 2023

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**Policy:**

1. Storage and Safeguards, Generally: will store and safeguard client Health Information to protect the unauthorized access to client Health Information. Health Information includes, but is not limited to: the results of, or participation in wellness coaching sessions, questionnaires, exercises, general wellness education or services; medical history; or information protected under the Health Insurance Portability and Accountability Act of 1996, Public Law 104-91, as amended, and related HIPAA regulations (45 CFR. Parts 160-164).
2. Health Information Storage& Access: Client Health Information is stored electronically on a secure, password protected online, cloud-based platform or portal and/or on secure, password protected computer. Client Health Information is accessed only on a minimum necessary basis to provide the client’s requested services.
3. Passwords: All access to client Health Information will be password protected. Additionally, accounts for email, computer logins, and the cloud-based platforms used for storage and transmission are all password protected. Passwords are unique for the individual user and will not be shared.
4. Health Information in Communications: Electronic transmissions of client Health Information is safeguarded to minimize uses and disclosures. Whenever feasible, emails containing client Health Information will be encrypted in transit or storage, unless the client has given written consent to transmit the Health Information unprotected after being advised of the risks of such action. Written consent from the client will be retained for the minimum amount of time, as required by law. All outgoing electronic communications with Health Information will include the following disclaimer:  
  
“This email message, together with any attachments, is intended solely for the person or entity to which it is addressed and may contain confidential information. Copying, forwarding, or distributing this message by persons or entities other than the addressee is prohibited. If you are not the intended recipient, please note that you are strictly prohibited from disseminating, distributing, or copying this material. If you have received this communication in error, please contact the sender immediately, and delete this email from your system.”
5. Disposal: Health Information will be disposed of through an acceptable destruction method after the appropriate retention period has been met, as required by law. Health Information will be disposed of in a manner to avoid unauthorized uses or disclosures. A destruction log and any certifications for document and information disposal will be maintained indefinitely.

**Procedure:**

1. Storage and Safeguards: New electronic information containing client Health Information, will be securely saved in a password protected online, cloud-based platform or portal or on \_\_\_\_\_ computer. Prior to transmitting an electronic communication containing client Health Information, the user will ensure they are on a secure network or encrypted and include the electronic communications disclaimer from Section 4, above.
2. Disposal: Appropriate methods for disposing include:
  - a. Electronic Health Information: All electronic Health Information will be permanently deleted off the online, cloud-based platform or portal and/or \_\_\_\_\_ computer.
  - b. Destruction Log: After each disposal of client Health Information, the client name, date of destruction, brief description of what was destroyed, and how destruction occurred will be logged.