

Summary of Changes

Business Associate Agreement (Revised 7/7/2020)

Office Ally's Business Associate Agreement is reviewed and revised on a regular basis to adhere to current HIPAA Privacy and Security regulations. Office Ally's Business Associate Agreement is the official BAA to execute in order to utilize Office Ally's services and products.

The revision completed on 7/7/2020 included minor changes, grammatical corrections, rephrasing for clarification, and the more notable changes listed below:

- **The following subsections were added to section II.b. to address 45 C.F.R § 164.512(i):**

vii. Public Health. Business Associate may use and disclose PHI for public health purposes in accordance with the requirements of 45 CFR §§ 164.512(b) and 164.514(e) and other applicable restrictions of federal and state laws and regulations.

viii. Health Oversight. Business Associate may disclose PHI to a health oversight agency for oversight activities authorized by law in accordance with the requirements of 45 CFR § 164.512(d) and other applicable restrictions of federal and state laws and regulations.

ix. Disclosures for Judicial and Administrative Proceedings and for Law Enforcement Purposes. Business Associate may disclose PHI in response to an order of a court or administrative tribunal, court-ordered warrant, subpoena, discovery request, or other lawful process, in accordance with the requirements of 45 CFR § 164.512(a), (e), and (f) and other applicable restrictions of federal and state laws and regulations.

x. Limited Data Sets. Business Associate may use PHI to create limited data set(s) in accordance with 45 CFR § 164.514(e), and may use or disclose such limited data sets for Health Care Operations, Research, or public health purposes pursuant to a data use agreement and in accordance with 45 CFR § 164.514(e) and other applicable restrictions of federal and state laws and regulations.

- **Section II.j. was revised to include Business Associate's responsibility to notify Covered Entity within 5 business days when individual has requested Business Associate to provide a list of PHI disclosures (45 CFR § 164.528).**
- **Paragraph IV.b.i. was revised to add "any underlying service agreement(s)".**