



WESTCOAST CHILDREN'S CLINIC

CSE-IT Breach Notification Policy

CSE-IT Online

WestCoast Children's Clinic's CSE-IT Online is used by entities with different regulatory and legal responsibilities. This policy applies to all customers that use WestCoast Children's Clinic's CSE-IT Online (also referred to as "Customer(s)"), though specific items or actions may not be applicable in all circumstances, dependent upon an entity's own responsibilities. This policy is developed with HIPAA privacy and security regulations as the primary governing body, and should be applicable in most situations. Any capitalized terms and/or acronyms in this policy that are not defined in this policy shall have the meanings assigned to them under applicable laws and regulations.

A "Breach" is the successful unauthorized access, use, disclosure, modification, or destruction of information or interference with system operations in an Information System in a manner that risks the confidentiality, integrity, or availability of such information. A Breach will not include an acquisition, access, use, or disclosure of PHI with respect to which WestCoast Children's Clinic has determined, in accordance with 45 C.F.R. § 164.402, that there is a low probability that the PHI has been compromised.

WestCoast Children's Clinic shall, following the discovery of a breach of unsecured PHI, notify the customer originating or responsible for the data of such breach pursuant to the terms of 45 CFR § 164.410 and cooperate in the covered entity's breach analysis procedures, including risk assessment, if requested. A breach shall be treated as discovered by WestCoast Children's Clinic as of the first day on which such breach is known to WestCoast Children's Clinic or, by exercising reasonable diligence, would have been known to WestCoast Children's Clinic. WestCoast Children's Clinic will provide such notification to Customer Covered Entity without unreasonable delay and in no event later than 15 business days after discovery of the breach. Such notification will contain the elements required in 45 CFR § 164.410.

Customers will be responsible for notifications of individuals affected by the breach, as well as other actions in accordance with rules and regulations they are subject to.

This may include but not be limited to HIPAA regulations 45 CFR subpart D. Customers are responsible for determining what their responsibilities are in the event of a breach of confidential and/or personal information.



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WCC will take actions as described in relevant business associate agreements with affected Customer organizations as appropriate in response to a breach.

To the extent practicable, WestCoast Children's Clinic will use commercially reasonable efforts to mitigate any further harmful effects of a Security Breach of the CSE-IT Online system.

This paragraph will be deemed as notice to Customer that CSE-IT Online may receive unsuccessful attempts for unauthorized access, use, disclosure, modification or destruction of information, or interference with the general operation of CSE-IT Online's information systems and the Covered Services. Customer acknowledges and agrees that even if such events constitute a Security Incident as that term is defined under HIPAA, CSE-IT Online will not be required to provide any notice regarding such unsuccessful attempts other than this notice.

Organization Notice

CSE-IT Online will send any applicable Security Breach notifications to the notification email address provided by Customer in the applicable agreement with the Customer or via direct communication with the Customer if so requested.

Individual Notice

CSE-IT Online does not have the personal and contact information necessary to provide individual notice to persons affected by a breach of information security, and it is incumbent upon the customers and users of CSE-IT Online to alert individuals affected by the breach, in accordance with rules and regulations they are subject to. Ultimately, the customer is responsible under laws such as HIPAA to provide individuals with notice of a Security Breach.

Notification by a Business Associate

If a breach of unsecured protected health information occurs at or by a business associate of WestCoast Children's Clinic as related to CSE-IT Online, WestCoast Children's Clinic will notify the customer following its discovery of the breach. WestCoast Children's Clinic must provide notice to customer without unreasonable delay and no later than 15 business days from its discovery of the breach.