SAFE HARBOR™ POLICY BUNDLE | IMPLEMENTATION GUIDE

Customization & Implementation Guide

Your step-by-step walkthrough for deploying the Safe Harbor™ Policy Bundle, establishing documented compliance with Texas SB 1188 and HB 149, and securing your practice's standing on the Texas Sovereignty Registry.

TOTAL IMPLEMENTATION TIME: APPROXIMATELY 60 MINUTES
This guide is designed for non-technical Practice Managers and Office Administrators. No coding, IT expertise, or legal background required.

Bundle Version:	1.0 (February 2026)
Governing Statutes:	Texas SB 1188 + HB 149
Audience:	Practice Managers, Office Administrators, Compliance Officers
Prerequisite:	KairoLogic Safe Harbor™ Policy Bundle (purchased)
Support:	support@kairologic.net | kairologic.com/support

IMPORTANT: This implementation guide accompanies the Safe Harbor™ Policy Bundle and is intended to assist practices in deploying compliance documentation. It does not constitute legal advice. Practices should review all customized documents with qualified legal counsel before final execution. KairoLogic provides compliance tooling and documentation; regulatory interpretations should be confirmed with an attorney licensed in the State of Texas.

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BEFORE YOU BEGIN

Bundle Contents Checklist

Verify that your Safe Harbor™ Policy Bundle download contains all of the following documents. If any item is missing, contact support@kairologic.net before proceeding.

#	Document	Filename	Purpose
1	SB 1188 Data Sovereignty Policy	SB1188-Data-Sovereignty-Policy.pdf	Core compliance policy for data residency
2	AI Transparency Disclosure Kit	AI-Disclosure-Kit.txt	Website footer text + patient consent form (HB 149)
3	Vendor Evidence Ledger	Evidence-Ledger.xlsx	Vendor inventory + data residency tracking
4	Employee Acknowledgment Form	Employee-Acknowledgment.pdf	Staff sign-off on data sovereignty policy
5	Vendor Certification Template	Vendor-Data-Sovereignty-Cert.pdf	Send to vendors for residency confirmation
6	Quarterly Audit Checklist	Quarterly-Audit-Checklist.pdf	Recurring compliance verification tool
7	Sentry Scan Report (PDF)	Your-Practice-Sentry-Report.pdf	Baseline forensic scan of your digital footprint
8	This Implementation Guide	Safe-Harbor-Implementation-Guide.pdf	Step-by-step deployment walkthrough

You will also need:

- Your practice's legal business name (as registered with the Texas Secretary of State)
- The name and title of your Medical Director or Practice Owner (signatory)
- Access to your practice website (or contact info for your web developer)
- A list of your current digital vendors (EMR, website host, email provider, etc.)
- A printer and pen (for "wet ink" signatures on the executed policy)

PHASE 1

Customizing the SB 1188 Data Sovereignty Policy Pack

Estimated Time: 15 minutes

The Data Sovereignty Policy Pack is the cornerstone of your Safe Harbor™ defense. Under Texas SB 1188, demonstrating "Reasonable Care" requires a **written, executed policy** that is specific to your practice. A generic template is insufficient — the policy must be customized to reflect your entity's legal identity, organizational structure, and operational reality.

Step 1.1: Identify Your Legal Entity

Open the SB 1188 Data Sovereignty Policy document. Throughout the document, you will see placeholder text that must be replaced with your practice-specific information.

Placeholder	Replace With	Example
[Practice Name]	Your legal business name	Austin Family Care, PLLC
[Practice Address]	Primary business address	4521 Medical Pkwy, Austin, TX 78756
[Compliance Officer]	Name of designated officer	Maria Santos, Office Manager
[Medical Director]	Licensed supervising physician	Dr. James Chen, MD
[Effective Date]	Date of policy execution	February 8, 2026

PRO TIP: Use Your Legal Entity Name, Not Your DBA
In a state audit, regulators look for the entity registered with the Texas Secretary of State. If your marketing name is "Bright Smile Dental" but your legal entity is "Bright Smile Dental Arts, PLLC," use the PLLC name throughout the policy. You may add the DBA in parentheses on the cover page.

Step 1.2: Appoint a Data Sovereignty Officer

SB 1188 Safe Harbor provisions are strengthened when a practice designates a specific individual as the point of contact for data residency compliance. This person does not need a legal or technical background — they serve as the organizational owner of the policy.

Recommended designees (in order of preference):

- Office Manager or Practice Administrator (most common — handles day-to-day vendor relationships)
- HIPAA Privacy Officer (if already designated, natural extension of existing role)
- Medical Director or Practice Owner (appropriate for small practices with fewer than 10 staff)
- External compliance consultant (if outsourced, ensure they are named in the policy with contact info)

Step 1.3: The "Wet Ink" Execution Requirement

Once customization is complete, print the finalized policy and obtain physical signatures from the Practice Owner or Medical Director on the execution page (Section 12).

> **WARNING:** A digital-only policy file is **insufficient** for Safe Harbor standing. Texas regulators and plaintiff attorneys specifically look for signed, dated, physical policy documents during audits and litigation discovery. Print the policy, sign it with pen, and store it in your HIPAA binder alongside your Notice of Privacy Practices and BAAs.

After signing, you should have:

- One signed original stored in your HIPAA compliance binder
- One digital scan (PDF) stored in your secure practice drive
- One copy provided to your designated Data Sovereignty Officer

PHASE 2

Deploying the AI Transparency Disclosure Kit (HB 149)

Estimated Time: 10 minutes

Texas House Bill 149 requires healthcare practices to provide "clear and conspicuous" notice to patients when artificial intelligence, machine learning, or automated decision-making tools are used in any aspect of patient care, communication, or data processing. Non-compliance exposes your practice to regulatory action and undermines your SB 1188 Safe Harbor standing.

Step 2.1: Website Footer Disclosure

Add the following disclosure text to your website footer. It should appear on every page of your practice website, immediately above or below your existing HIPAA/privacy notice links.

> **RECOMMENDED FOOTER TEXT:**
>
> *"This practice utilizes AI-assisted tools for administrative and clinical support functions. All artificial intelligence systems employed by this practice process data exclusively on servers located within the continental United States, in compliance with Texas SB 1188 (Data Sovereignty) and HB 149 (AI Transparency). Patients have the right to request human review of any AI-assisted recommendation. For questions about our AI practices, contact our office directly."*

> **HOW TO ADD THIS TO YOUR WEBSITE**
> If you manage your own website (WordPress, Squarespace, Wix), add this text to your footer widget or site-wide footer HTML. If your website is managed by a developer or agency, forward the AI-Disclosure-Kit.txt file and request the update. Turnaround should be under 24 hours. Keep the confirmation email from your developer as evidence of deployment.

Step 2.2: Patient Intake AI Consent Addendum

If your practice uses AI for any patient-facing function — including chatbots, intake form auto-fill, appointment scheduling bots, clinical transcription, or diagnostic decision support — you must add the AI Consent Form from your bundle to your standard new-patient packet.

Implementation steps:

- Print the AI Consent Form from AI-Disclosure-Kit.txt (Page 2)
- Add it to your new-patient packet, immediately after the HIPAA Notice of Privacy Practices
- Train front desk staff to collect signatures on this form alongside existing intake paperwork
- For existing patients: distribute the form at next scheduled visit or include in a mass mailing
- Store signed forms in the patient chart (physical or scanned into your EMR)

Step 2.3: AI System Inventory

Document every AI or automated tool currently in use at your practice. This inventory is required by the Data Sovereignty Policy (Section 7.2) and serves as evidence during audits.

AI Tool / Service	Function	Vendor	Data Residency Verified?
Example: Freed AI	Clinical note transcription	Freed Health, Inc.	[ ] Yes [ ] No [ ] Pending
Example: Weave	Patient messaging / reminders	Weave Communications	[ ] Yes [ ] No [ ] Pending
			[ ] Yes [ ] No [ ] Pending
			[ ] Yes [ ] No [ ] Pending
			[ ] Yes [ ] No [ ] Pending

PHASE 3

Building Your Forensic Evidence Ledger

Estimated Time: 15 minutes

The Forensic Evidence Ledger is your most powerful Safe Harbor artifact. In the event of a state inquiry or Cure Notice, this document proves that you conducted due diligence on every vendor that touches patient data. Regulators have stated that documented vendor verification is the **single strongest indicator of Reasonable Care**.

Step 3.1: Inventory Your Digital Vendors

Open the Evidence-Ledger.xlsx spreadsheet. For each vendor in the following categories, create a row entry:

Category	Common Vendors	Priority
Electronic Medical Records (EMR)	Epic, Athenahealth, DrChrono, Kareo, NextGen	CRITICAL

Website Hosting	GoDaddy, Bluehost, WP Engine, Squarespace, Wix	**CRITICAL**
Email Service	Google Workspace, Microsoft 365, Zoho, ProtonMail	**HIGH**
Appointment Scheduling	Zocdoc, PatientPop, SimplePractice, Acuity	**HIGH**
Telehealth Platform	Doxy.me, Zoom for Healthcare, Amwell	**CRITICAL**
Billing / RCM	Waystar, Availity, Tebra, AdvancedMD	**HIGH**
AI / Transcription	Freed, DeepScribe, Nuance DAX, Amazon Transcribe	**CRITICAL**
Marketing / CRM	Mailchimp, HubSpot, Constant Contact, Birdeye	**MODERATE**
Phone / VoIP	Weave, RingCentral, Vonage, 8x8	**MODERATE**
Cloud Backup	Carbonite, Datto, Veeam, Backblaze	**HIGH**

Step 3.2: Send Verification Emails

For each vendor marked CRITICAL or HIGH priority, send the following verification request. A pre-written email template is included later in this guide.

VENDOR VERIFICATION EMAIL (Template):

Subject: Data Residency Confirmation Request — Texas SB 1188 Compliance

Dear [Vendor Name] Compliance Team,

Our practice is implementing compliance measures under Texas Senate Bill 1188 (the Texas Data Sovereignty Act), which requires healthcare providers to verify that all patient data is stored and processed exclusively within the continental United States.

Please confirm the following:
1. The physical location of servers that store or process our patient data
2. Whether any sub-processors route data outside the United States
3. The cloud regions/availability zones in use for our account

If you have a Data Processing Addendum or Data Residency Certificate available, please provide a copy. We require this confirmation within 14 business days.

Thank you for your cooperation.
[Your Name], [Your Title]
[Practice Name]

Step 3.3: Document the Evidence

- When a vendor replies confirming U.S.-only data residency, save the email as a PDF
- Name the file: [VendorName]-DataResidency-Confirmed-[Date].pdf
- In the Evidence Ledger spreadsheet, enter the Date Verified, the Vendor Representative name, and set Status to "Confirmed"

- If a vendor provides a formal Data Processing Addendum (DPA) or Certificate, attach it alongside the email confirmation
- Store all evidence PDFs in a dedicated folder: /Compliance/SB1188/Vendor-Confirmations/

> **WARNING:** If a vendor **refuses** to confirm U.S.-only data residency, or cannot provide the requested information within 14 business days, flag the vendor as "Unverified" in your Evidence Ledger and begin evaluating domestic alternatives immediately. An unverified Critical-tier vendor is your single largest compliance exposure under SB 1188.

PHASE 4

Employee Acknowledgment & Training

Estimated Time: 10 minutes

Your Data Sovereignty Policy is only enforceable if your staff knows it exists and has formally acknowledged it. SB 1188 Safe Harbor provisions require documented evidence that all personnel with access to patient data have been trained on and have accepted the policy.

Step 4.1: Distribute Acknowledgment Forms

- Print one Employee Data Sovereignty Acknowledgment form (Appendix B of the Policy Pack) for each current staff member
- Schedule a brief 10-minute all-hands meeting (or distribute individually for small practices)
- Walk through the key points: what data sovereignty means, what tools are prohibited, and how to report concerns
- Have each employee sign and date their acknowledgment form
- Scan signed forms and store both physical and digital copies

Step 4.2: Key Training Points (5-Minute Brief)

Topic	Key Message
What is SB 1188?	Texas law requiring patient data to stay in the U.S. Violations = $250K per incident.
What is prohibited?	No foreign AI tools, no personal email for patient data, no unapproved apps.
What is Shadow IT?	Any software you use for work that IT hasn't approved. This includes browser extensions, free AI tools, and p
How to report a concern	If you suspect data is going offshore, tell [Compliance Officer] within 24 hours. No retaliation.
What happens if I violate?	First offense = warning + retraining. Repeated = disciplinary action up to termination.

PHASE 5

Finalizing Your Registry Standing

Estimated Time: 5 minutes

Once Phases 1 through 4 are complete, your practice's digital compliance footprint will have materially changed. The final step is to update your standing on the Texas Sovereignty Registry.

Step 5.1: Trigger a Sentry Rescan

After deploying the AI Transparency disclosure on your website (Phase 2), the KairoLogic Sentry engine will automatically detect the update during its next scheduled scan cycle (within 48 hours). To trigger an immediate rescan:

- Visit kairologic.com and navigate to the scan section
- Enter your practice URL to initiate a fresh Sentry Scan
- Review the updated scan results — your AI Transparency score should now reflect the disclosure
- If your overall score has improved to Sovereign (80+), proceed to finalize verification

Step 5.2: Finalize Verification on the Registry

Log into the Texas Sovereignty Registry at kairologic.com/registry and locate your practice listing. Click "Claim & Verify" to submit your verified identity and link your compliance documentation. Upon verification, your practice status will update from "Pre-Audited" to **"Verified Sovereign"** and the Sovereignty badge will appear next to your listing.

WHAT "VERIFIED SOVEREIGN" MEANS FOR YOUR PRACTICE
Verified Sovereign status is visible to the public, including patients, referral partners, and competitor practices browsing the registry. It signals that your practice has taken active, documented steps to comply with Texas data sovereignty law — a meaningful differentiator in an increasingly compliance-conscious market.

PHASE 6

Ongoing Compliance & Quarterly Maintenance

Estimated Time: 5 minutes per quarter

Safe Harbor standing is not a one-time achievement. Texas SB 1188 requires **ongoing, documented compliance**. The following quarterly cadence will keep your practice protected:

Quarter	Action Items	Deliverables
Q1 (Jan–Mar)	Annual policy review + update. New employee acknowledgments. Vendor certs on fi	Updated policy (if amended). Signed ack[illegible] Critical tier
Q2 (Apr–Jun)	Sentry Watch scan. AI system inventory update. Shadow IT sweep.	Scan report PDF. Updated AI inventory. Sweep results documented.
Q3 (Jul–Sep)	Mid-year vendor audit. Staff refresher training. Website disclosure review.	Quarterly Audit Checklist (Appendix C). Training attendance log.
Q4 (Oct–Dec)	Annual forensic audit. Evidence Ledger reconciliation. Policy version control.	Annual audit report. Complete Evidence Ledger. Policy amendment log.

IMPLEMENTATION COMPLETION

Final Verification Checklist

Before considering your Safe Harbor™ implementation complete, verify that every item below has been addressed. This checklist serves as your implementation sign-off document.

Phase	#	Item	Done
1	1.1	Legal entity name inserted throughout policy document	[ ]
1	1.2	Data Sovereignty Officer designated by name and title	[ ]
1	1.3	Policy printed and signed ("wet ink") by authorized signatory	[ ]
1	1.4	Signed policy filed in HIPAA compliance binder	[ ]
1	1.5	Digital scan (PDF) of signed policy stored securely	[ ]
2	2.1	AI Transparency disclosure deployed on website footer	[ ]
2	2.2	AI Consent Form added to new-patient intake packet	[ ]
2	2.3	AI System Inventory completed and filed	[ ]
3	3.1	All digital vendors inventoried in Evidence Ledger	[ ]
3	3.2	Verification emails sent to all Critical and High-tier vendors	[ ]
3	3.3	Vendor confirmation replies saved as PDFs and logged	[ ]
4	4.1	Employee Acknowledgment forms signed by all staff	[ ]
4	4.2	Staff training brief completed (key points covered)	[ ]
5	5.1	Sentry Scan triggered post-disclosure deployment	[ ]
5	5.2	Registry listing claimed and verification initiated	[ ]
6	6.1	Quarterly review calendar set (next review date noted)	[ ]

Implementation Completed By: ______________________________

Date: ______________________

Next Quarterly Review Date: ______________________

SUPPORT & ESCALATION

Getting Help When You Need It

Issue	Contact	Expected Response
General implementation questions	support@kairologic.net	Within 24 business hours
Website disclosure deployment help	support@kairologic.net (subject: "HB 149 Website Help")	Within 24 business hours
Vendor refuses to confirm residency	support@kairologic.net (subject: "Vendor Escalation")	Within 48 business hours
Registry status not updating	support@kairologic.net (subject: "Registry Update")	Within 24 business hours
Legal questions about SB 1188 / HB 149	Consult your practice attorney. KairoLogic cannot provide legal advice.	N/A
Request a re-scan or updated report	Visit kairologic.com — Scan section	Immediate (automated)
Upgrade to Sentry Watch monitoring	kairologic.com — Services page	Activation within 24 hours

YOU'RE PROTECTED.

By completing this implementation guide, your practice now has documented evidence of Reasonable Care under Texas SB 1188 — a signed data sovereignty policy, vendor verification records, employee acknowledgments, AI transparency disclosures, and a baseline forensic scan. This portfolio of evidence is your strongest defense against civil penalties and the foundation of your Safe Harbor standing. Welcome to the Texas Sovereignty Registry.