

# Trello PHI Exposure Scan

What a real 15-minute scan delivers — anonymized sample based on typical small behavioral health practice findings. Your scan will be specific to your workspace.

<b>Practice profile</b> 12-employee behavioral health practice 6 active Trello boards (Free tier) Bay Area, multi-discipline	<b>Findings</b> 23 instances of PHI exposure 4 of 6 boards affected 9 CRITICAL · 11 HIGH · 3 MEDIUM	<b>OCR penalty exposure</b> Estimated range based on 2025 comparable settlements: <b>\$50K – \$225K</b> (Deer Oaks 2025: \$225K, similar profile)
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## DETAILED FINDINGS

#	Board	Field / Location	PHI Category	Severity	Remediation in Migration
1	Intake	Card titles contain patient first+last name and DOB	Names + DOB (\$164.514)	CRITICAL	Migrate to SharePoint List with item-level permissions; replace card title with internal case ID
2	Intake	Card attachments include scanned insurance cards (member IDs visible)	Insurance ID + Names	CRITICAL	Quarantine; replace intake flow with BAA-covered Microsoft Forms feeding SharePoint
3	Therapy Auth	Card comment threads include mental-health diagnosis codes (DSM-5)	Clinical record info	CRITICAL	Encrypted SharePoint list, restricted to clinical Entra security group, audit-logged access
4	Therapy Auth	Card descriptions include medication names + dosages	Clinical record info	HIGH	Clinical SharePoint with item-level perms; medication metadata moved to structured fields
5	Employee Onboard	Card description field contains staff SSN (1 instance, screen 1)	SSN	CRITICAL	Quarantine and purge from Trello; migrate to HR-only SharePoint with strict access logs
6	Regional Center	Spreadsheet attachment lists 47 client names, DOBs, and authorization status	Bulk PHI roster	CRITICAL	Replace with structured SharePoint list; case-level permissions per coordinator
7	Regional Center	Card labels include service codes that map 1:1 to billable diagnosis	Billing / clinical inference	HIGH	Replace with internal codes; map back to billing in restricted SharePoint view
8	Intake	Typeform feeding board collects PHI; no Atlassian/Typeform BAA on Standard plan	Upstream BAA gap	CRITICAL	Replace Typeform with Microsoft Forms (BAA-covered); responses land directly in SharePoint
9	All boards	No tenant audit log: cannot prove who viewed which card / when	Audit log gap (\$164.312)	HIGH	Microsoft 365 unified audit log enabled tenant-wide; 90-day retention minimum
10	All boards	Board-level access only: every member sees every card on board	Access control gap	HIGH	Per-item permissions in SharePoint by role + case assignment

... 13 additional findings in full report

## WHAT YOU GET IN THE FULL ENGAGEMENT

- **Complete written exposure report** for every board, with severity, citation to specific HIPAA Rule sections, and a 1:1 remediation plan.
- **1:1 mirrored SharePoint structure** — same lists, lanes, and card fields your team uses today, with item-level permissions per role.

- **BAA-covered intake** via Microsoft Forms, replacing Typeform / Google Forms / JotForm.
- **Full historical migration** — every card, attachment, comment, timestamp preserved (or quarantined when it shouldn't move).
- **Power Apps kanban wrap** so clinical staff use a board view that looks like Trello on day one.
- **30-day hypercare** after cut-over — we're on call as your team finds the edges.

**Want this scan for your Trello?**

15-minute screen-share · no obligation · written report in your inbox within 24 hours.

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*This document is a redacted sample for illustration. Findings represent typical patterns from MaxPower Labs Trello→SharePoint migration engagements with small behavioral health practices. Specific findings in your scan will be unique to your workspace and reviewed under engagement-level confidentiality. Penalty exposure estimates are based on OCR settlement comparables and are not legal advice.*