To Whom It May Concern:

As the CEO of GreyCastle, a leading cybersecurity firm headquartered in New York State, I am writing to attest that Foothold Technology's 100% compliance score across all 18 control groups prescribed by HIPAA and the Federal Department of Health and Human Services, is among the highest we've ever seen. While compliance to any standard is a moving target, currently, their score is better than most hospitals and doctors' offices; better than any State government department we've worked with, and better than the technology companies with which we have experience. Moreover, Foothold Technology has approached their most recent drive for compliance with more integrity, intensity and commitment than nearly any other client with which we have worked.

I can say without reservation that Protected Health Information (PHI) is as safe or safer with Foothold Technology than it is any other vendor in the Behavioral Health market.

At GreyCastle, we talk a lot about the difference between compliance and security. You need both, of course, but sometimes these two frameworks are in conflict. The focus of our risk mitigation work with Foothold was primarily around documentation, training and the memorialization of their current procedures, as well as taking their security infrastructure to the next level. From the very beginning of our engagement with Foothold, their commitment to the security of their customers' data has never been in question.

Lastly, and perhaps even more important than their compliance score, Foothold has recognized that HIPAA compliance has enjoyed less attention in the Behavioral Health industry than in the physical health world. In response, and in partnership with us, Foothold has committed to a multi-year cybersecurity educational program on behalf of their clients and industry. Foothold will make GreyCastle's expertise available to their clients in webinars, newsletters and other media, all in an effort to bring the rigor and intensity necessary for true cyber security to the behavioral health, mental health, developmental disability and drug rehab industry. In addition, they have worked with us to develop a low-cost "snap" risk assessment designed specifically for providers in the community behavioral health industry. Given Foothold's role as a Business Associate to hundreds of organizations in NY State alone, to say nothing of their national footprint, there is a real opportunity to increase the security of this industry as a whole, across the country. Because cybersecurity is only as strong as its weakest link, we strongly encourage the Behavioral Health community to avail themselves of the resources Foothold is making available.

If you have any questions about Foothold's HIPAA compliance, cybersecurity resources and solutions available to their customers, please do not hesitate to contact us at intel@greycastlesecurity.com.

Sincerely,

Reg Harnish, CEO