



HIPAA Proposed Security Regulation Self-evaluation Tool

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www.nchica.org

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Introduction

- *HIPAA EarlyView™* Version 1.0 is a self-administered tool that will assist an organization in assessing its readiness to comply with the proposed HIPAA Security Regulations.
- *HIPAA EarlyView™* can be used by:
 - Health plans
 - Healthcare providers
 - Clearinghouses
 - Public Agencies
 - Vendors

Development of *HIPAA EarlyView*TM

- NCHICA is a 501(c)(3) nonprofit
- Members established HIPAA Implementation Planning Task Force in 1999
- Conceived by NCHICA HIPAA Data Security Work Group (providers, payer, state government, law firm, IT vendors, etc.)
- Developed over three months
- 521 questions track proposed Security Rule in sequence of implementation requirements / options

NCHICA HIPAA Implementation Planning Task Force

Co-chair: Harry Reynolds, BCBSNC
Co-chair: David Kirby, DUMC

Transactions, Codes & Identifiers

Co-chair: Stacey Barber, EDS
Co-chair: Pete DiPietro, BCBSNC
Co-chair: Roger McKinney,
Carolinas Healthcare System

Security

Co-chair: Mike Serozi,
BCBSNC
Co-chair: Rosemary Abell,
Keane, Inc.

Privacy

Co-chair: Carmen Hooker Buell,
Quintiles
Co-chair: Jean Foster,
PCMH
Co-chair: Barb Garlock,
Health Data Institute

Awareness, Education, & Training

Co-chair, Stephen Wagner,
NC MGMA
Co-chair, Linda Goodwin,
DUHS
Co-chair, Gail Taylor,
BCBSNC

Interoperability

Co-chair: Mike Serozi,
BCBSNC
Co-chair: Susan Haeseler
Raytheon Corporation

Data Security

Co-chair: Rosemary Abell,
Keane, Inc.
Co-chair: Susan Brown Ward
NC DHHS MH/DD/SAS

Organizations Included:

- Advisory Consulting Services
- Blue Cross & Blue Shield of North Carolina
- Cii Associates
- CertSite
- Data Dimensions, Inc.
- Duke University Health System
- Future HealthCare
- Interpath Communications

Organizations Included: (cont.)

- Keane
- NC DHHS - DIRM
- NC DHHS DMA (Medicaid)
- NC DHHS - DMH/DD/SAS
- Presideo
- UNC-Charlotte
- WakeMed
- Womble Carlyle Sandridge & Rice PLLC

Construction of Questions

- Teams assigned to develop questions according to 5 sections of proposed rule
- 10 readers commented on questions
- Work Group met to review comments and revise questions
- Team reached consensus on questions, their potential meaning and relevance to proposed implementation

Uses of *HIPAA EarlyView™*

- Staff education
- Gap analysis
 - Inadequate or missing policies
 - Previously unidentified vulnerabilities
- Due diligence documentation
- Budget planning

Critical Self-assessment

NOTE: Legal counsel should be consulted prior to deployment as data collected by *HIPAA EarlyView™* may be subject to discovery proceedings or considered a public record.

Greeting



NCHICA

HIPAA EarlyViewTM

Version 1.0

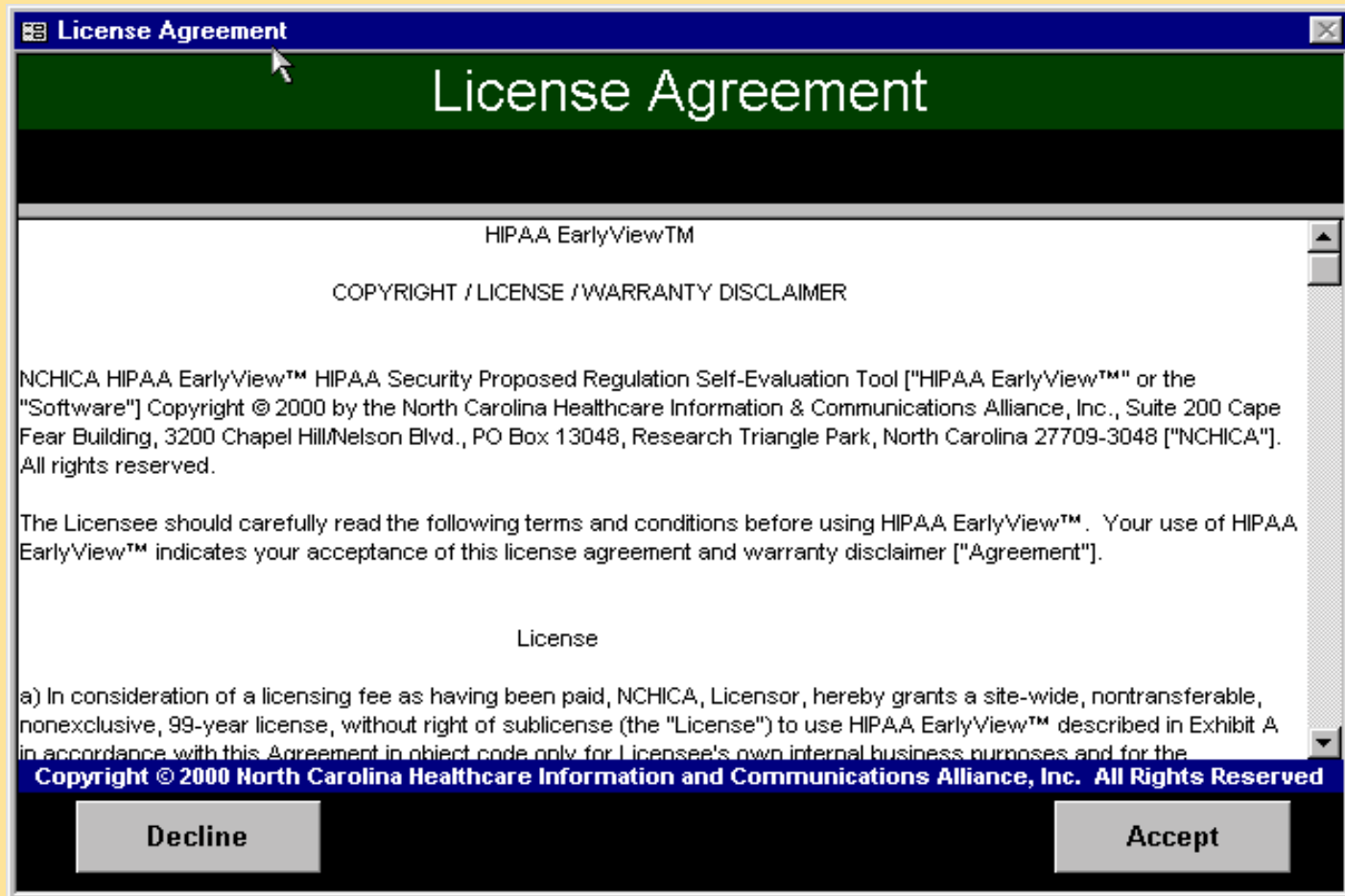
HIPAA Security Proposed Regulation Self-Evaluation Tool

<http://www.nchica.org>
919-558-9258

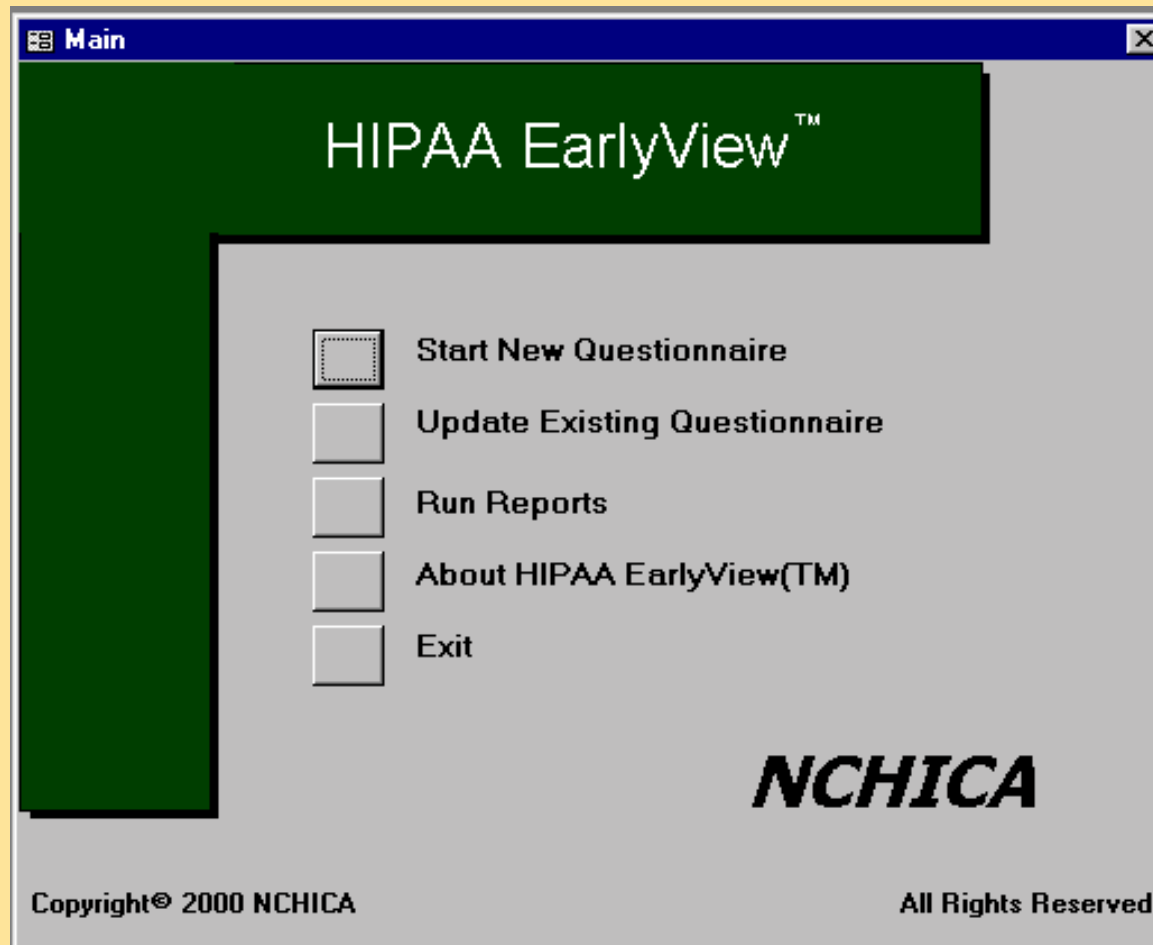


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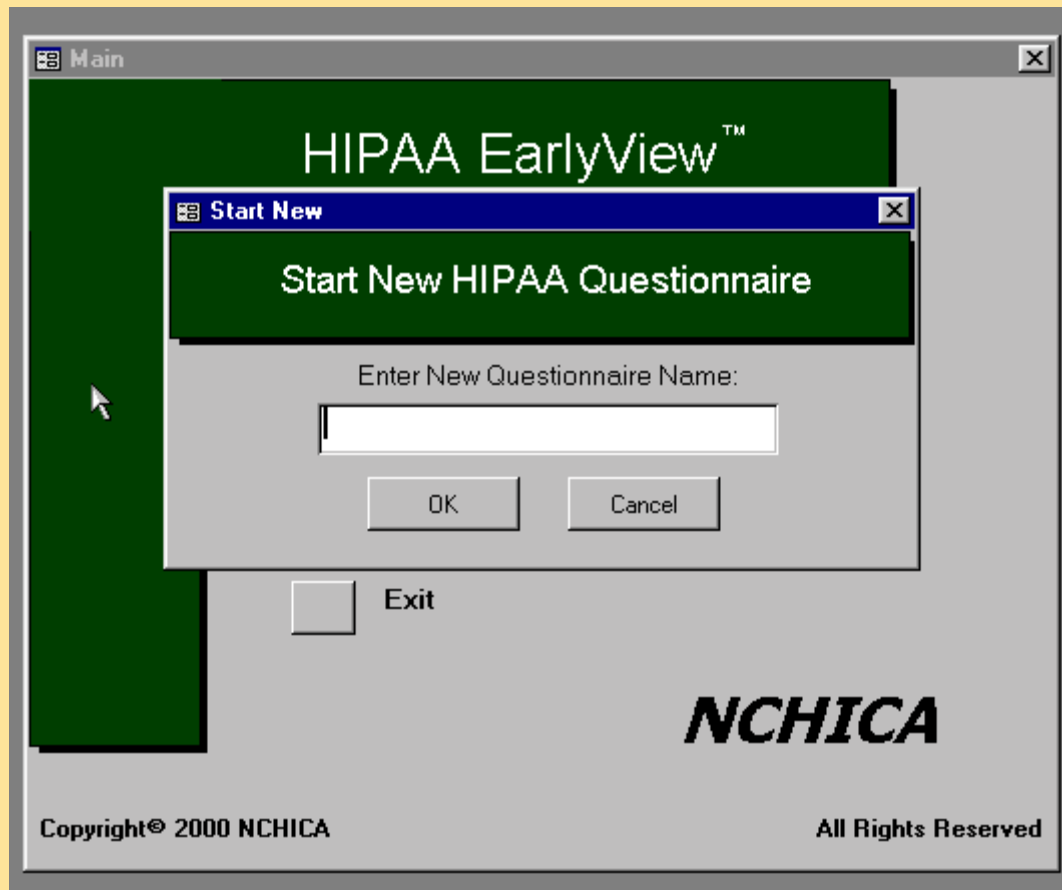
License Agreement (per site)



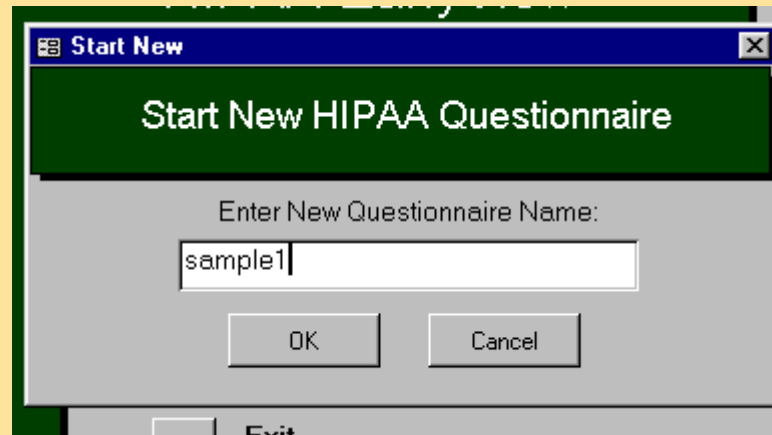
Main Menu



Start a New Questionnaire



Start a New Questionnaire



The image shows a screenshot of a software dialog box titled "Start New". The dialog box has a dark green header bar with the text "Start New HIPAA Questionnaire" in white. Below the header, the text "Enter New Questionnaire Name:" is displayed. A text input field contains the text "sample1". Below the input field are two buttons: "OK" and "Cancel". At the bottom of the dialog box, there is a partially visible "Exit" button.

Start New

Start New HIPAA Questionnaire

Enter New Questionnaire Name:

sample1

OK Cancel

Exit

Enter Contact Data

Contact Information Form _ □ ×

HIPAA Security Questionnaire Contact Data

Department Name

Organization	<input type="text"/>				
Division	<input type="text"/>				
Cost Center	<input type="text"/>				
Project Lead	<input type="text"/>				
Title	<input type="text"/>		Start Date	<input type="text"/>	M/D/YY
Address1	<input type="text"/>		Due Date	<input type="text"/>	M/D/YY
Address2	<input type="text"/>		Facilitator	<input type="text"/>	
City	<input type="text"/>		Title	<input type="text"/>	
State	<input type="text"/>	Zip	F. Phone	<input type="text"/>	
Phone	<input type="text"/>	Fax	F. E-Mail	<input type="text"/>	
E-Mail	<input type="text"/>		Serial #	<input type="text"/>	

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Save and Close FormHIPAA Questionnaire

Enter Contact Data

Contact Information Form

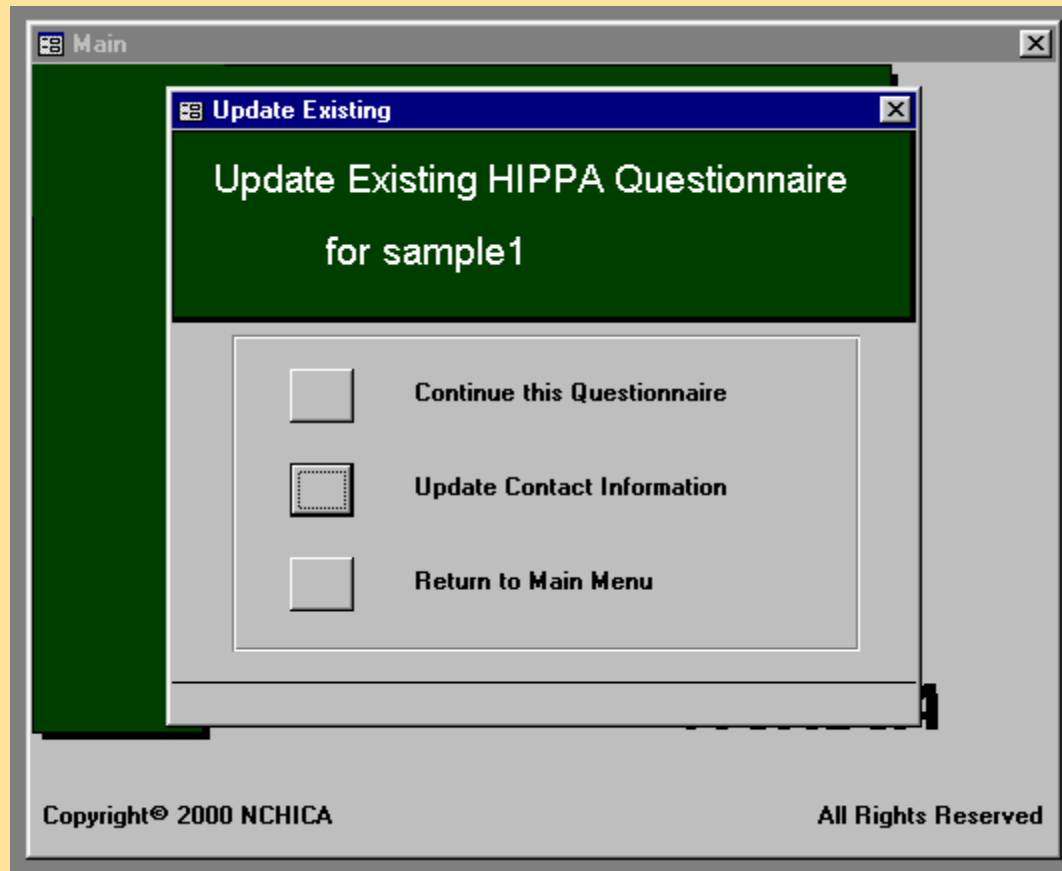
HIPAA Security Questionnaire Contact Data

Department Name

Organization	<input type="text" value="Org"/>	
Division	<input type="text" value="Div"/>	
Cost Center	<input type="text" value="CC"/>	
Project Lead	<input type="text" value="Proj Lead"/>	
Title	<input type="text" value="Title"/>	Start Date <input type="text" value="1/1/00"/> M/D/Y
Address1	<input type="text" value="Addr1"/>	Due Date <input type="text" value="12/31/00"/> M/D/Y
Address2	<input type="text" value="Addr2"/>	Facilitator <input type="text" value="Facilitator"/>
City	<input type="text" value="City"/>	Title <input type="text" value="Title"/>
State	<input type="text" value="ST"/>	F. Phone <input type="text" value="(999) 999-9999 Ext."/>
	Zip <input type="text" value="99999-9999"/>	F. E-Mail <input type="text" value="facilitator@sampel.com"/>
Phone	<input type="text" value="(999) 999-9999 Ext."/>	Serial # <input type="text" value="1234"/>
	Fax <input type="text" value="(999) 999-9999"/>	
E-Mail	<input type="text" value="email@sample.com"/>	

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Update Questionnaire Menu



Security Questions

HIPAA EarlyView(TM) - [HIPAA Security Questionnaire]

File Edit View Insert Format Records Tools Window Help

HIPAA Security Questionnaire

This form is used by a facilitator to conduct the HIPAA Security Questionnaire. It is designed to be used to capture all required information. Comments should be forwarded to DataSecurity@NCHICA.ORG. Thanks!

Question **1** Questionnaire Name: sample1

Has an external entity or group performed a technical evaluation for BOTH your information systems AND network design for compliance with security standards?

Answer: Yes No N/A Unanswered Due Diligence Demonstrated: Check if YES

Comments:

Refer To:

Document Name:

Doc Type: Document Location:

Periodically Reviewed? Next Review Date (MM/DD/YYYY):

Point of Contact: Contact Phone:

Contact Title: Contact E-Mail:

Contact FAX:

Answer Date (M/D/Y): Readdress Requirement:

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Save and goto next question Save Record Previous Question Save/Exit

Enter the desired question number below to GOTO that question.

Record: 1 of 521

Form View

Security Questions

This form is used by a facilitator to conduct the HIPAA Security Questionnaire. It is designed to be used to capture all required information. Comments should be forwarded to DataSecurity@NCHICA.ORG. Thanks!

Question **1**

Questionnaire Name: sample1

Has an external entity or group performed a technical evaluation for BOTH your information systems AND network design for compliance with security standards?

Answer: Yes No N/A Unanswered

Due Diligence Demonstrated: Check if YES

Comments: evaluation done by test org - june 1999

Refer To:

Document Name: tech eval

Doc Type: Paper Document Location:

Periodically Reviewed? No Next Review Date (MM/DD/YYYY):

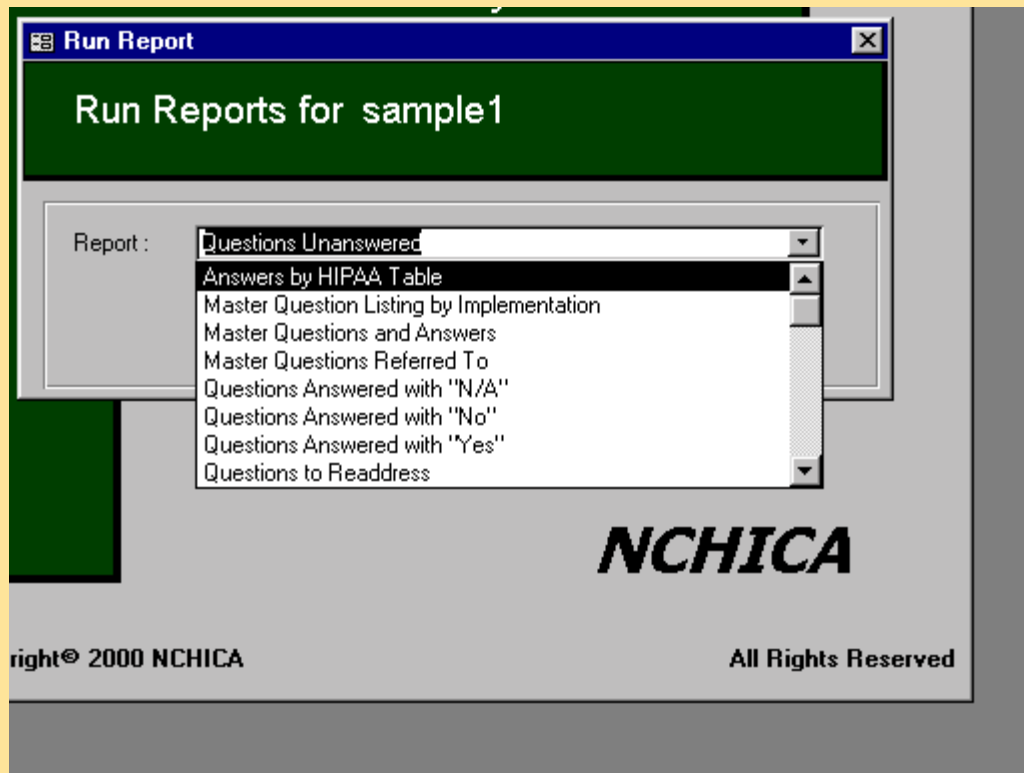
Point of Contact: Mr. Contact Contact Phone: (999) 999-9999 Ext. 1234

Contact Title: boss Contact E-Mail: boss@sample.com

Contact FAX: (999) 999-9999

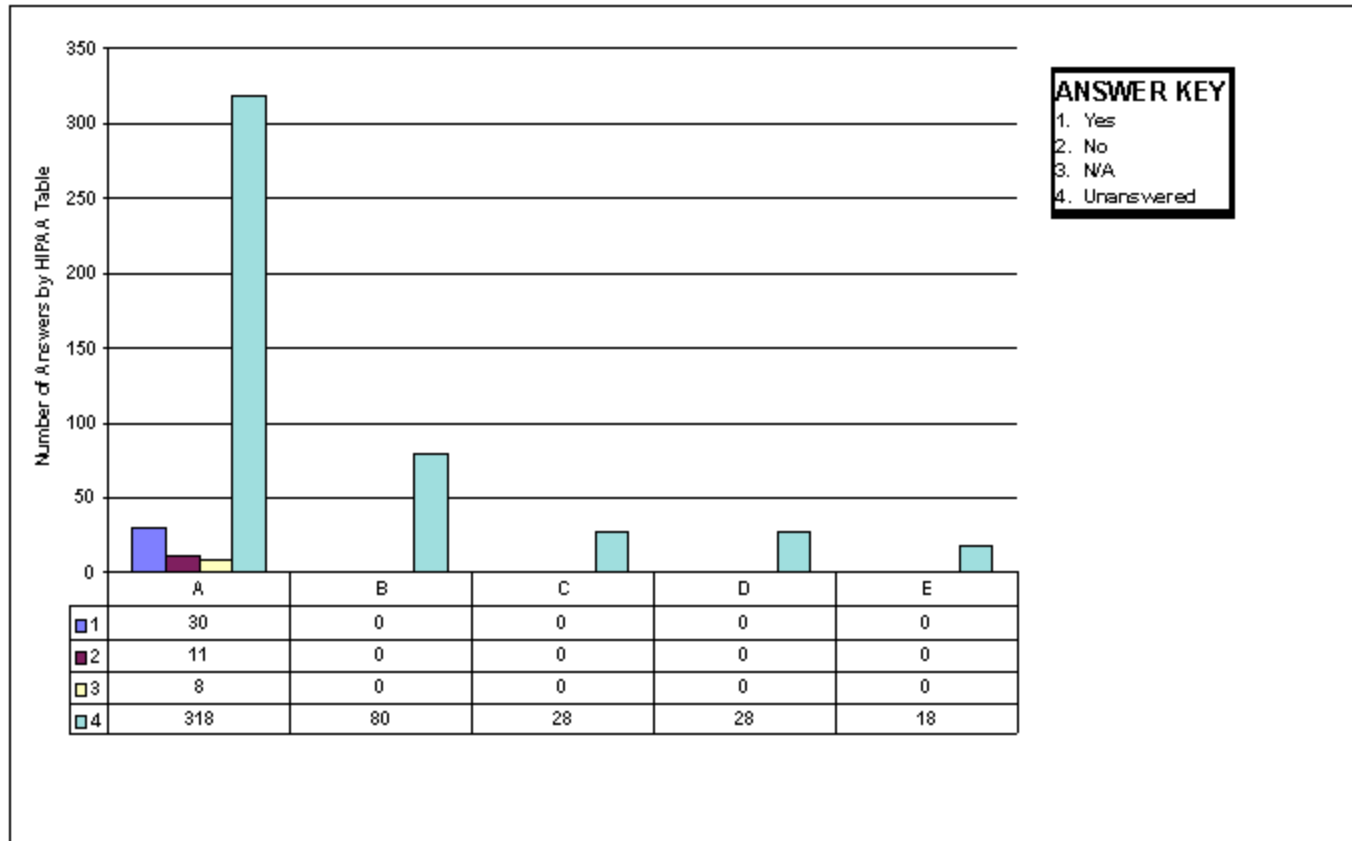
Answer Date (M/D/Y): 6/9/00 Readdress Requirement:

Report Menu



Report Example

Answers by HIPAA Table



Report Example

Questions answered with "NO"

sample1

HIPAA Table

A

HIPAA Requirement Certification

HIPAA Implementation

Question Number	Detailed Question	Refer To:	Contact	Contact Phone
2	Does your organization have an internal audit group that performs technical evaluations for BOTH information systems AND network design for compliance with security standards?	Susan Reference		

Report Example

Question Listing by HIPAA Requirement and Implementation

HIPAA Table

A

HIPAA Requirement

Certification

HIPAA Implementation

Question Number **Detailed Question**

- | | |
|---|---|
| 1 | Has an external entity or group performed a technical evaluation for BOTH your information systems AND network design for compliance with security standards? |
| 2 | Does your organization have an internal audit group that performs technical evaluations for BOTH information systems AND network design for compliance with security standards? |
| 3 | Does your organization maintain a technical evaluation history for BOTH information systems AND networks? |
| 4 | Does your organization require that BOTH information systems AND networks are reviewed after any additions or significant modifications to design? |
| 5 | Does your organization document all steps taken to ensure and maintain security compliance? |

HIPAA Requirement

Chain of trust

HIPAA Implementation

Question Number **Detailed Question**

- | | |
|---|--|
| 6 | Does your organization require that a chain of trust partner agreement be signed with all third parties that process protected health information? |
| 7 | Does your organization explicitly state requirements for ensuring confidentiality and integrity of data in any chain of trust agreements? |
| 8 | Does your organization explicitly state requirements for availability of data in all chain of trust agreements? |
| 9 | Does your organization maintain the right to audit the security measures of third parties who process protected health information? |

System Requirements

- Microsoft® Access® 97, Version 7 SR2
- Pentium® II with 32-64 megabytes RAM
- FreeZip or WinZip
- Not supported but FAQs on Web site

Associated Developments

- IBM Healthcare Group
- Raytheon
- Xcare and Boundary Information Group
- Others ???

IBM's Enhancements

- Reduced and revised question set - 125
- Standardized terminology
- Emphasized regulatory consistency
- Recommended methodology that captures enterprise-wide variation
- Leveraged in IBM's Fast Track HIPAA assessment
- Shared to support standard HIPAA tools

Raytheon Risk Management System

- Step 1: Survey Module
 - Incorporates *HIPAA EarlyView™* dataset
- Step 2: Analysis Module
 - Reviews survey for risk
 - Graphically displays risk assessment results
 - Identifies and weighs alternative courses of action
 - Manages implementation of selected actions
 - Permits “what if” analysis
- Step 3: Reports
 - Risk Assessment
 - Risk Management
 - Risk Relationship Cross-reference
 - Loss Expectancy
 - Compliance

Xcare

Boundary Information Group (BIG)

- Quick Start Assessment template that categorizes, prioritizes and maps to 80 compliance requirements
- ASP-based tool that has preloaded the Quick Start Assessment template and complete *HIPAA EarlyView™* tool
 - manage risk exposure (assign resources and create mitigation strategies)
 - monitor compliance efforts (continuous reporting).



Available as Zipped file download on
the NCHICA secure Web site

www.nchica.org

Thank you !

Questions ???