Health Transactions

Connecting Healthcare ®

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NIST HIPAA Security Toolkit HIPAA Summit Presentation Discussion

AGENDA

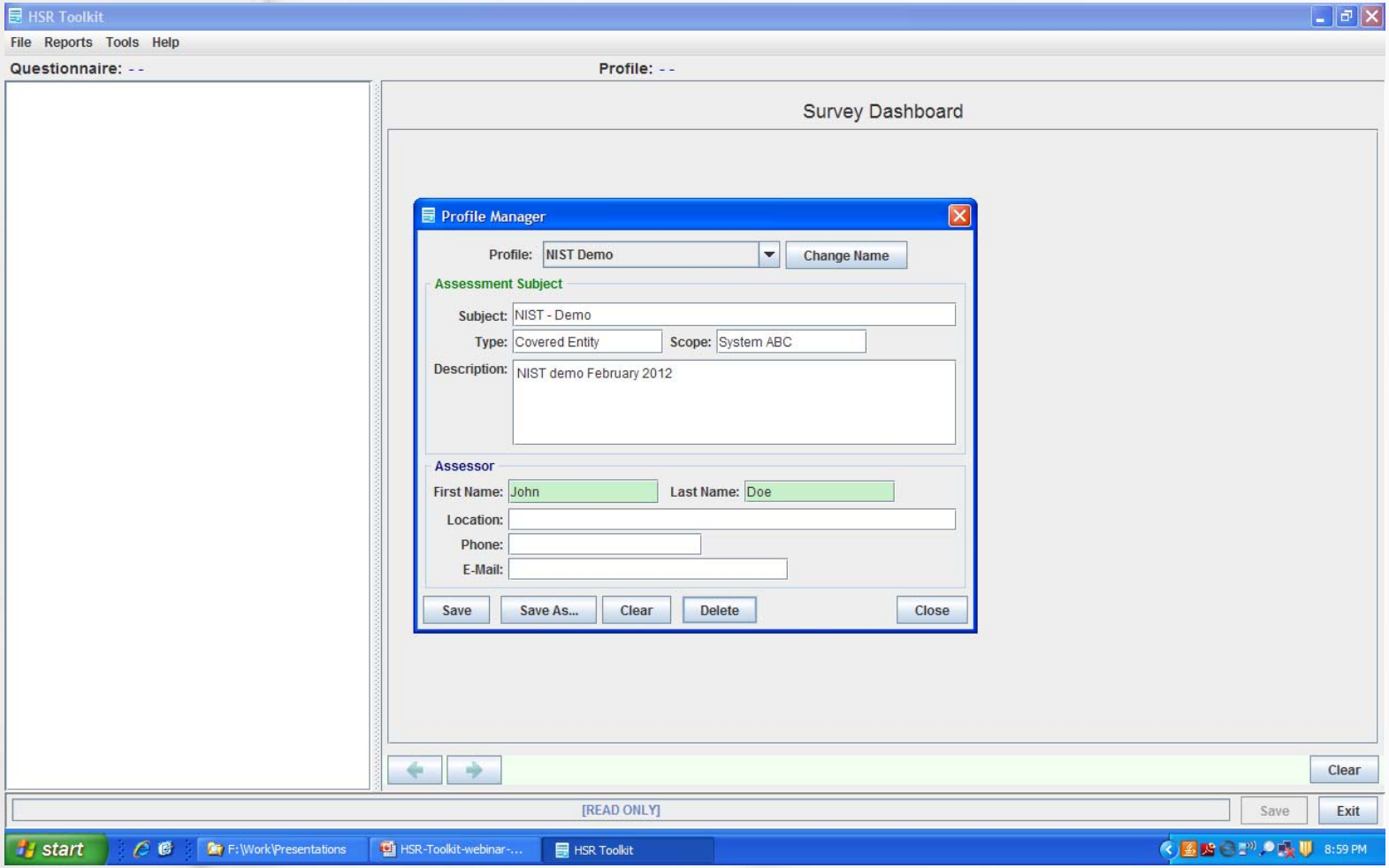
- What is the Toolkit
- A drive around the Toolkit
- HIPAA Security in 2013
- Clearinghouse Case Study
- Hospital Case Study
- Emerging Risk Analysis Focus Areas
- Toolkit next steps

NIST HIPAA Toolkit

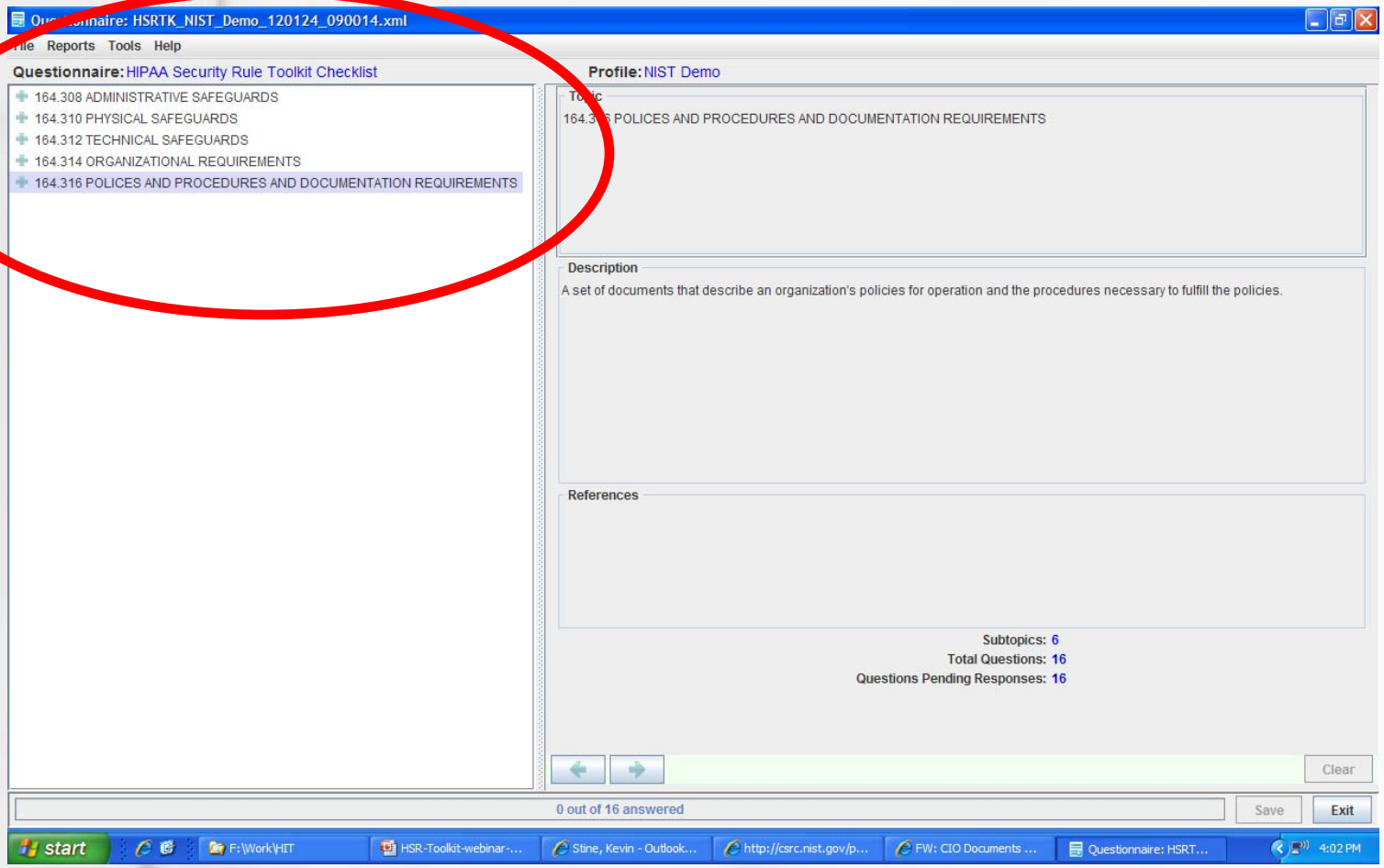
ONLY HIPAA Security!

- Outline = HIPAA Security Rule
- Questions = NIST SP 800-66 & SP 800-53
- User Guide
- Download from NIST at http://scap.nist.gov/hipaa/
  - Microsoft Windows
  - Red Hat Enterprise Linux
  - Apple MAC OS
- Both Standard + Enterprise Versions

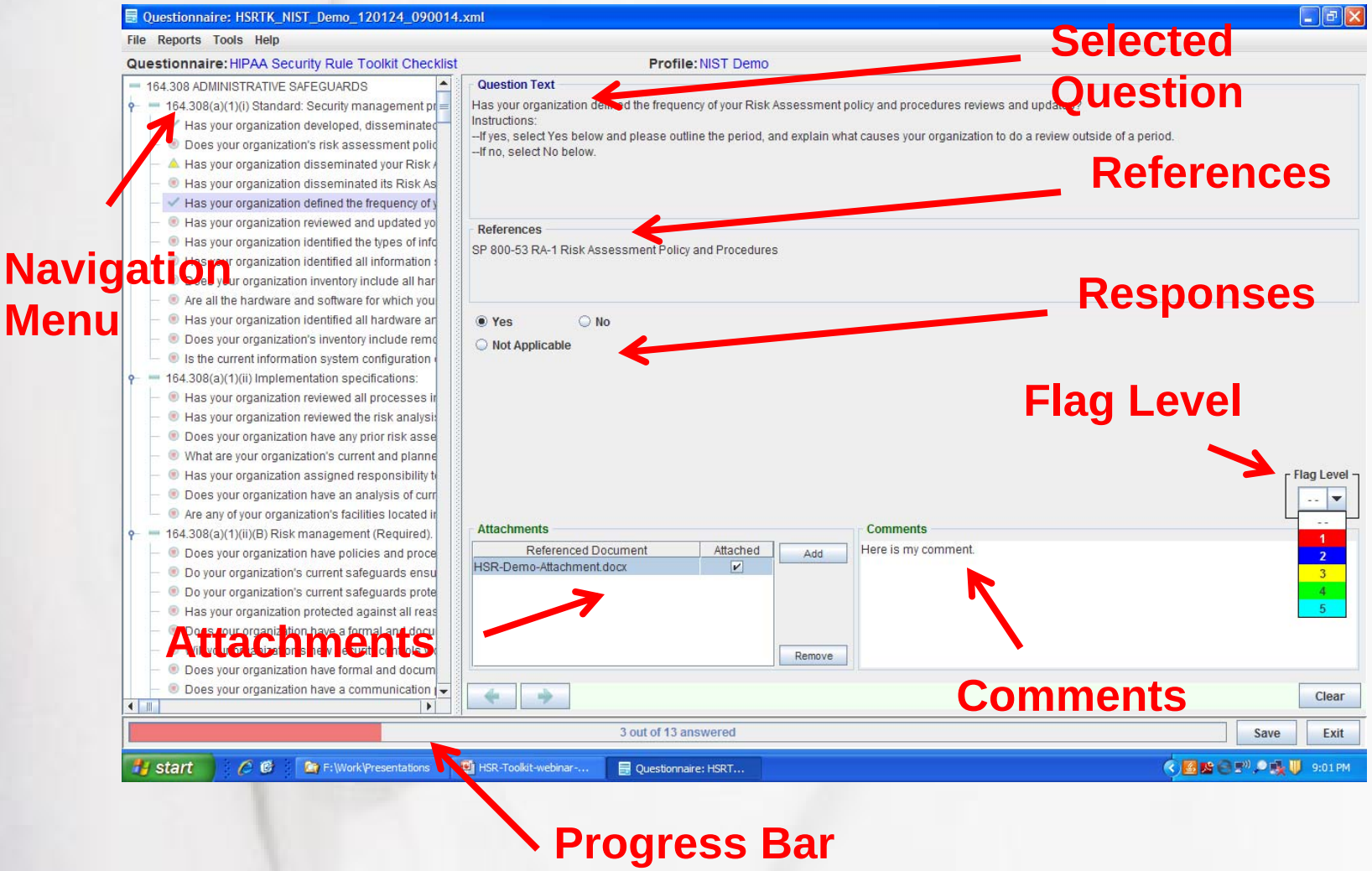
Create a Profile



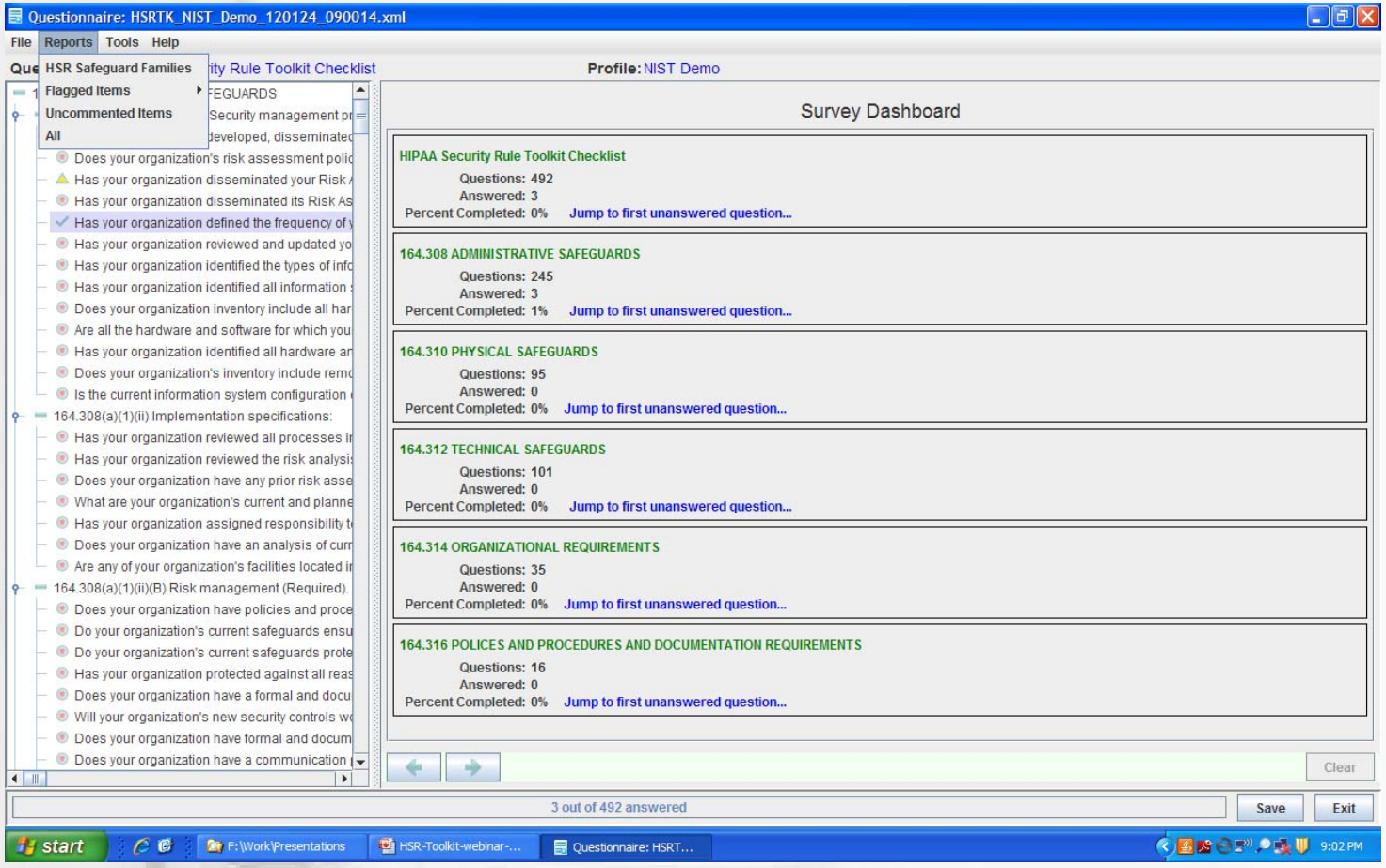
Organized by Safeguard Family



Explore the Application Interface



Generate Reports



The Value of the Toolkit

- Prompts consideration of risks
- Suggests safeguards/controls
- Provides documentation repository
- Go-to reference for audits
- **NIST “it is not a compliance tool!”**

HIPAA Security in 2013

- Omnibus Final Rules
  - Combining
    - July 2010 NPRM on HITECH changes to HIPAA
    - October 2009 NPRM on GINA changes to HIPAA
    - August 2009 IFR on HIPAA Breach Notification
    - October 2009 IFR on HIPAA Enforcement Rule
  - Compliance Dates: 180 days from effective date (30-60 days)
- OCR audits
  - 15 Audits in 2011, only CEs
  - Audit Protocols 2012
  - 95 Audits in 2012, only CEs
  - Most likely CEs + BAs
- Meaningful Use Risk Analysis

Culture of Compliance

- OCR aggressively enforcing the HIPAA Privacy, Breach and Security Rules
- OCR suggests that HIPAA covered entities (CEs) and business associates (BAs) should have a robust HIPAA Privacy and Security compliance program, including:
  - Employee Training
  - Vigilant implementation of policies and procedures
  - A prompt action plan to respond to incidents and breaches
  - Regular internal audits
- All of this requires Management Commitment

National Clearinghouse Case Study
Jopari Solutions, Inc.

- Jopari Solutions is an EDI technology solutions company as well as a national clearinghouse for the workers' compensation, auto insurance and healthcare industry
- EDI Transaction Sets (ASCX12) Include:
  Medical Claims and Acknowledgments
  Medical Reports/ Attachments
  Electronic Remittance Advice
  Electronic Fund Transfers
- Web Portal Service Solutions
- Healthcare Electronic Attachment Solutions
- Customers include Payers, Healthcare Providers, national clearinghouses, practice management system, banking and other technology vendors

Manual HIPAA Security Risk Assessment Challenges Pre NIST Toolkit

Pre Planning the NIST HIPAA Security Risk Assessment

- Security Team met 3 times a week for 2 hours /6 Weeks
- Pre audit data collection/ risk assessment interview/ survey questions
- Senior management buy in – major concern was time management of resources

Process Documentation Challenges -Lacked automated documentations tools

Challenge of Cross Referencing Multiple Documents / Other Security Compliance Requirement Considerations –very labor intensive process

HSR Assessment & Report Generation Challenges – Communicate IT risk assessment to technical as well as the non technical audience

Scope of HSR Assessment –Manual Process

- Excellent Support from Senior Management -Understood Compliance / Business Impact
- 12 Departments / groups of functions with 76 applications or groups of applications/Identified 35 Risk Issues
- Required cross walking other security requirements to the NIST HSR to mitigate redundant controls/ policies and procedures to ensure consistency
- Updated security policies , procedures and training program
- **Manual Process**= timely , costly , redundant processes and impacted IT resources company wide

NIST HSR Assessment Toolkit
How is it being used?

Using the Enterprise version

–To Automate Previously Manual Tasks

- simplifies the process to identify, prioritize and communicate key IT risk and security metrics
- provides the ability to consolidate multiply reports to generate HSR analysis and management reports

- To Reduce IT Risk Assessment Time and Expense- Workflow Automation
- To increase effective IT risk assessment communication for the business audience
- NIST converted many of the legal / IT terminology question and reports into “English” which enable the security team to clearly communicate IT risks to non-technical audiences.

Assessment Toolkit
How is it being used?

Document Repository Tool

Provides flexibility and efficiency in metrics and reporting. Used as document repository to include links to security policy and procedures as they relate to specific security controls

Document Tool to Help Optimize Audit Results

Enables easy access for users and auditors to cross reference security controls against policies and procedures. Also provides tools to update security controls

How is it working?

- Easy to implement and the application is flexible/menu driven
- Automated documentation and report generation tools are great and really save time as compared to manual processing
- The organization of the NIST HSR Assessment content , makes it easy to cross reference other security control requirements to mitigate redundant processes and also helps to standardize the use of language across supporting documentation
- Excellent ROI –Free Resource Tool
  Projecting at least a 50 % reduction in time and resource requirements for next NIST HSR Assessment

Hospital Case Study

Rutland Regional Medical Center
An Affiliate of Rutland Regional Health Services

2nd largest hospital in Vermont

- Established September 6, 1896
- Number of Beds: 188
- Emergency Department Visits: 35,740
- Number of Births: 397
- Rehabilitation Visits (Physical, Occupational, Speech Therapy): 35,835
- Medical and Radiation Oncology Visits: 2,4290

- Outpatient Registrations: 154,918
- Inpatient Admissions: 7,022
- Financial Assistance: $4,574,581

- Medical Staff: 234
- Medical Specialties: 40
- Employees: 1,530
- Volunteers: 379

RRMC Security Compliance

- Good record of proactive risk analysis and remediation
- Dedicated, growing team dedicated to information security
- Most recent risk analysis examined 18 departments/groups of functions with 73 applications or groups of applications, and 116 identified risk issues
- Adopting a complete suite of security policies and procedures
- Did not have a prior documentation system for information security

How is it being used?

- RRMC has already gone through multiple risk analyses and reviews
- Needed a way to organize the documentation
- Considered a Wiki or SharePoint intranet site; slow progress
- Using the HSR Toolkit to:
  - Review controls and look for issues
  - Organize the supporting documentation for compliance
  - Keep the documentation current and relevant

Implementation Expectations vs. Reality

- Using the Enterprise version
- 2-person information security team:
  - One with an administrative security background
  - One with a technical security background
- Planned 2-hour meetings, 2 days a week, for 8 weeks
- Completed first pass in only 5 weeks
- Using flags to identify areas needing further development, references

How is it working?

- Great way to organize documentation for compliance
- Asks about lots of controls
- Can use Comments field for justifications, explanations
- Asks about lots of controls they haven’t implemented

Incorporating the HSR Toolkit into Daily Operations at RRMC

- RRMC has XML development capability, considering adding questions and customizing for RRMC-specific controls
- ✓ Need to integrate HSR Toolkit review and updating into policy and procedure development and adoption processes
- ✓ Still developing the routines and processes, but sleeping better
- ✓ Overall, very happy to be using the HSR Toolkit

Emerging Risk Analysis Focus Areas

- EHR Audit controls and process
- Emergency access (break the glass) controls
- Minimum necessary in the use of an EHR (enhanced role and permission controls)
- CE update its access/authorization/modification and termination procedures to accommodate a revised environment with the HER
- Review transport/transmission and related controls for:
  - CCD and other types of exchange
  - HIE connectivity
  - Immunization registry connectivity
  - PQRS or related connectivity
  - Other public health connectivity (syndromic surveillance/lab data)
  - Patient portals

Tools

Tools may create tribulations

- Seeing many “tools” being produced and sold or promoted
- A checklist IS NOT A RISK ANALYSIS!!!!!!
- REC checklists
- Other checklists
- EHR vendor solutions
- Incomplete Risk Analyses reports

NIST HIPAA Toolkit: Next Steps

- Omnibus Rules update of content
- 2013 tech revisions
- Additional reports planned
- Just being planning now
  - Will know more later in 2013

Questions?

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THANK YOU!