

HIPAA Security—The Sleeping Giants

Depending on the current state of your organization, compliance with the proposed security regulations may take much longer than the normally designated two years for compliance. HIPAA Pros has done several hundred compliance assessments in Covered Entities of all sizes and shapes. The bullets below outline some of the Security Compliance areas your organization may want to focus on **NOW.**

- Contingency Program Development [45 CFR §142.308(a)(3)]
- Certification Process and Program Development [45 CFR §142.308(a)(1)]
- Records Processing Policies and Procedures Development [45 CFR §142.308(a)(4)]
- Internal Audit Policies and Procedures Development [45 CFR §142.308(a)(6)]
- Personnel Security [45 CFR §142.308(a)(7)]
 - Assure security awareness training for system users
- Security Configuration Management Policies [45 CFR §142.308(a)(8)]
 - Hardware and software installation and maintenance review and testing
 - Hardware and software inventory
 - Security Testing (host and network component penetration testing) Protocols and Services
 - Security Management Process Development [45 CFR §142.308(a)(10)]
 - Risk Analysis (cost vs. loss)
 - Risk Management (reduce and maintain level of risk reduction)
- Security Awareness Training [45 CFR §142.308(b)(6)] all employees, agents, and contractors must participate
- Audit controls [45 CFR 42.308(c)(1)(ii)]
 - To record and examine system activity
- Data authentication [45 CFR §142.308(c)(1)(iv)]
- Implementation Feature [§ 142.308(d)(1)(ii)(A)]
 - Access controls
 - Protection of PHI Transitions over Open or Private Networks so that it can not easily be intercepted and interpreted by parties other than the intended recipient (VPN- encryption/decryption)
- Network Controls [45 CFR §142.308(d)(2)]
 - Alarm (IDS)