

Guard against HIPAA violations

January 2012 marked the beginning of the HIPAA audit compliance program, as announced by The Department of Health & Human Services' Office for Civil Rights. Approximately 150 audits were conducted for healthcare organizations of all shapes and sizes to measure their compliance with the HIPAA privacy and security rules. KPMG was hired by the United States Department of Health and Human Services (HHS) to perform pilot program audits on covered entities that represent the diverse range of providers, health plans and clearinghouses operating today. The pilot program gave organizations a better idea of how HIPAA audits will be conducted in the future and what they need to do to prepare for them.

Industry experts are advising that organizations take steps to prepare themselves for any potential compliance evaluation, including:

- Conducting a comprehensive review of security governance documentation and training.
- Addressing the entire life cycle of electronic and hard copy protected health information (PHI) throughout the
 organization, including its creation, its maintenance, and its disposal.
- Examining and documenting in advance any compliance gaps and associated remediation tasks.

Get Prepared!

VCPI can help your organization measure its current compliance levels and get ahead of the game when it comes to HIPAA audits. Our HIPAA Security Assessment (HSA) is a focused review that covers all Standards and Implementation Specifications in the HIPAA Security Rule as well as requirements related to the HITECH Act Breach Notification rules.

The assessment assembles a baseline set of security controls that are applicable to all healthcare organizations. This review can assist your organization in proactively identifying and addressing security-related issues and concerns, which can greatly reduce the risk of information compromise. More importantly, the HSA and TRA support a partnership between you and VCPI in an effort to establish and maintain a comprehensive, thorough evaluation of your security control landscape.

You'll receive a specialized baseline assessment that can fulfill your "Risk Analysis" HIPAA requirement when performed at least annually. You'll also receive a scorecard and report of all findings, and we'll include recommendations for the remediation of any issues that are discovered.

Our Process

Upon engagement, VCPI will work with you to complete the following tasks:

- Introduce the assessment process and establish a primary point of contact for activity coordination
- Collect and review your existing security documentation (e.g., policies, standards, procedures, etc.)
- Coordinate discussions with your representatives who have knowledge of the security control environment
- (Where applicable) Schedule the onsite evaluation of your facility/facilities and associated security processes
- (Where applicable) Assemble materials necessary to test the effectiveness of the assessed controls
- Analyze collected data, compile assessment findings, and assign risk ratings
- Present scorecard, assessment report, and any remediation plan recommendations

Security Categories

The following is a high-level overview of the security information discussed and documented as part of our assessment; these security categories are mapped directly to the HIPAA Security Rule, as well as other related industry best practices.

General Information Security

• Information Security Governance

Organizational Security

- Vendors and Related Third-Party Agreements
- Assignment of Information Security Responsibility

Information Assets Privacy & Security

- Secure Handling/Storage of Confidential Information
- Secure Information Exchange/Transmission

Physical & Environmental Security

- Physical Access Controls for Facilities
- Visitor/Contractor/Third-Party Access

Network Operations Security

- Encryption
- System Audit Logging and Monitoring
- Security Control Testing
- Information Backups
- Equipment & Software Inventory
- Equipment Transportation

Logical Access Security

- User Access for Network and Systems
- User IDs

Systems Development & Change Management Security

- Systems Development
- Change Management
- **Business Continuity/Contingency Operations**
 - Business Continuity Plan
 - Plan Testing and Personnel Training
 - Business Impact Analysis

- Data Destruction
- Security of Unattended Equipment
- Environmental Protections
- Maintenance Records
- Anti-Virus/Malware
- Intrusion Protection/Detection Systems
- Vulnerability/Patch Management
- Firewalls
- Network Segregation
- Passwords
- User Sessions

- Disaster Recovery Plan
- Contingency Operations for Emergency Situations

Contact VCPI at 1-877-908-8274 or visit vcpi.com today to learn more about beginning your HIPAA Assessment.

About VCPI

Since 2000, VCPI's customized IT solutions have solved business challenges inherent in the long-term and post-acute health care (LTPAC) industry and have enabled clients to focus on taking care of patients and residents. Headquartered in Milwaukee, Wis., our nationwide client base relies on VCPI (Virtual Care ProviderSM) experts to deliver innovative and LTPAC-exclusive solutions.