

# Managing HIPAA Compliance: The Challenging Era of Security and Privacy

## Remember, HIPAA Is Not Just for Hospitals and Doctors

The *Health Insurance Portability and Accountability Act* (HIPAA) has existed for almost two decades, and healthcare organizations still struggle with regulatory compliance. They have sought to implement people, process, and technology controls to support compliance with HIPAA. However, with the [ever-growing list of breaches](#) affecting more than 500 individuals apiece, increasing frequency of audits and high-dollar penalties, evolving healthcare IT, and other pressures such as meaningful use incentives, HIPAA continues to challenge the healthcare industry.<sup>1</sup>

### Lowering HIPAA's Hurdle

HIPAA compliance needs to be practical and achievable. Organizations tend to strive for ideal HIPAA compliance programs. However, that effort may not be practical or sustainable. A few fundamental activities can establish the foundation of an achievable HIPAA compliance program:

- Complete a risk assessment that covers HIPAA's requirements. Doing so will assist with meaningful use requirements as well.
  - Know where your data is and how it is protected, including your third-party exposure.
  - Address all the regulatory requirements through policy, control implementation, or a remediation plan.
  - Assess risks on an ongoing basis.
  - Update annually.
- Establish a risk-based assessment program to verify security/privacy and compliance across the entire organization's applications, systems, workstations, laptops, biomedical equipment, mobile devices, and removable devices.
  - The evaluation of compliance, or the controls assessment, also needs to be updated annually.
- Develop prioritized plans for reducing risk to patient information.
- Review and test the ability to respond to a data breach (privacy) and/or security incident.
- Annually review the organization's privacy and security policies to verify they are updated appropriately and in alliance with the regulations and current business operations.

Per HIPAA, organizations are required to implement privacy and security controls that safeguard the handling, storing, and transmitting of patients' personal health information. Clearing HIPAA's hurdle and starting on a path of ongoing monitoring, compliance, and progressive security/privacy controls take the coordination and alignment of people, processes, and technology across the whole enterprise.



### How CHAN Healthcare Can Help

CHAN Healthcare offers a comprehensive suite of solutions that helps clients identify and mitigate risks, streamline processes, optimize the performance of compliance activities, and enhance data security/privacy programs. Our specialists have an average of 12 years of healthcare experience and have a thorough understanding of the healthcare industry, the challenges created by complex healthcare technology, and evolving regulatory demands.

## Proven HIPAA Solutions for Success

CHAN Healthcare offers the following solutions:

- **Security strategy:**
  - Give a broader, holistic view of information security, helps organizations assess and prioritize information security risks, and provide a road map for addressing the challenges in a prioritized and effective fashion.
- Solutions for the top ten healthcare challenges:
  - IT security governance
  - Application security
  - Security management process
  - Information infrastructure security
  - Third-party risk management
  - Cybersecurity
  - Penetration testing
  - Risk analysis
  - Policy development
  - Security program design and implementation
- Assessments, compliance, and remediation:
  - Assess existing compliance programs and controls, and identify areas and elements of noncompliance.
  - Evaluate organizational readiness for an OCR audit or certification, and complete a risk assessment for the meaningful use program.
  - Implement appropriate HIPAA policies and procedures and other remediation activities.

## Meaningful Compliance and Its Benefits

Meaningful compliance is not a once-a-year checklist item to cross off. It requires ongoing monitoring and enhancement. By adopting a proactive stance, organizations can verify that their internal processes and controls are working and address issues before incidents occur. Through mature compliance efforts, organizations even might realize cost savings through improved process efficiency.

## About CHAN Healthcare

CHAN Healthcare is dedicated to advancing healthcare organizations through our comprehensive internal audit services and targeted consulting services. With our deep industry knowledge and collaborative approach, we identify opportunities and tailor comprehensive solutions to manage risk and solve complex issues in today's changing healthcare climate. Formed in 1997, CHAN Healthcare provides internal audit and consulting services to more than 700 hospitals and healthcare organizations in more than 30 states across the country.

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<sup>1</sup> U.S. Health & Human Services Office for Civil Rights Breach Portal – Breaches Affecting 500 or More Individuals, [https://ocrportal.hhs.gov/ocr/breach/breach\\_report.jsf](https://ocrportal.hhs.gov/ocr/breach/breach_report.jsf)