

What's Current? What is the information security posture of your business associates? What about the physician practices or hospitals that you may be looking to acquire? Or the Health Information Exchange Network with which you may be joining? Do their information security policies, practices and compliance strategies align with HIPAA/HITECH and state laws, and most importantly, your own IT security program? You have been working diligently on your enterprise IT security program but your enterprise risk is changing. You must now give consideration to what is happening beyond your four walls.

22% of all breaches in 2011 involved an external party, accounting for more than 40% of the patient records exposed.

CynergisTek's Surveyor<sup>™</sup> Solution Series is a service designed to assess the IT security posture of organizations that are critical to your business but that are outside of your four walls.

HITECH proposed a number of new considerations for organizations that are defined as Business Associates under its expanded definition. Direct compliance with all of the safeguards and documentation requirements of the HIPAA Security Rule is the mandate for Business Associates. Some responsibilities are still shared, like breach notification, making it important to understand your BAs readiness. How are your business associates performing? As recent breach incidents show, it is your organization that will be featured prominently in the headlines in the event of a breach. It's your data that is at risk and consumers expect you to protect it.

The emerging best practice is to confirm that your business associates, especially those with whom you exchange or transmit ePHI, are in good standing. An opportune time to initiate a SurveyorBA evaluation is before you execute an agreement with a new business associate or renew an existing agreement.

The race to acquire physician practices, hospitals and other ancillary care organizations is on and the due diligence process must include a review of that M&A target organization's information security posture. How have the IT assets that you are acquiring been maintained? What risks might you incur when you connect that organization to your network? How fluent is the staff with privacy and security concerns, and more specifically, your organization's privacy and security policies and practices?

## **Shortcut**

- Regulatory Reference: §164.504(e)(2)-(e)(4)
- Ensure IT security performance for business associates, MD practices and HIEs aligns with your organization's IT security program

0

ш

>

8

S

SurveyorM&A was designed specifically to answer these questions – to qualify and quantify the IT security risk and to understand what remediation may need to be accomplished to effectively integrate these organizations into your enterprise.

ergistek SurveyorHIE

Cynergistek SurveyorIMA (cont'd)

Successful information exchange is the end-game and future stages of meaningful use are going to include more performance requirements for information exchange. Data security has been a challenge for most HIEs. The notion that an HIE's security is only as strong as its "weakest link" has proven to be an obstacle or deterrent to the growth and health of the HIE.

SurveyorHIE is a bidirectional solution. The HIE can initiate a SurveyorHIE study of a prospective participant to ensure the IT security health and conformity with the security framework established by the HIE. Likewise, a prospective participant looking to connect to the HIE can initiate a study of the HIE to verify the security posture of the HIE and the methods employed to safeguard participant data.

About Cynergistek

CynergisTek Surveyor provides a customizable and scalable approach to assess IT security risk beyond your four walls. Together, we will define your requirements and develop a project roadmap that best meets those requirements. Project activities may include:

- IT Security Performance Questionnaire
- Information Security Program Review
- IT Architecture Review
- Internal and External Vulnerability and Penetration Testing
- Site Surveys
- HIPAA/HITECH Gap Analysis
- Analysis, Reporting and Action Planning
- Report of Findings Workshop

CynergisTek is an authority in the field of healthcare information security management, regulatory compliance, IT audit, security technology selection and implementation, and IT infrastructure architecture and design services and solutions. We bring relevant and practical insights and guidance to our clients, we are disciplined in our methods, responsible stewards of our clients' resources, and generous in our service. These are our commitments. Learn more at www.cynergistek.com.

CynergisTek's dedicated team of client services professionals would be delighted to speak with you further about our services or expertise. Contact us at info@cynergistek.com or call 512.402.8550.

