The Custom Roadmap for Managing Organizational Compliance

The EHNAC Privacy and Security Toolkit includes a comprehensive set of policies, procedures, forms, best practices and compliance tools and is available for Business Associates and Group Health Plans. Regulatory topics include, but are not limited to, HIPAA/HITECH privacy, security, breach and enforcement. In addition, the EHNAC Privacy and Security Toolkit includes two hours of senior-level, individualized consulting assistance.

The toolkit is available in two versions. One designed for organizations subject to HIPAA/HITECH as a Business Associate and the second specifically customized for employers who sponsor Group Health Plans. Business Associates have always been responsible for adherence to the HIPAA Security requirements, but the extent to which Privacy rules apply has been an open question.

However, in mid 2019, the Office for Civil Rights clarified the applicable liability for Business Associates as it relates to Privacy requirements. These templates, Risk Assessment materials, draft privacy and security policies and procedures, and other compliance related tools have been updated to reflect the privacy component and aid in HIPAA/HITECH/Cybersecurity compliance specific to the needs of the Business Associate.

The Group Health plans (GHP) version provides templates, draft policies and procedures, and other compliance-related resource materials to aid in the specific compliance needs of GHP organizations. The sample Gap Analysis and Risk Assessment materials, policies and procedures include language and sample scenarios that are also customized to the unique business model experienced by the HIPAA GHP type of covered entity.
Once the toolkit is purchased and received, an identified person(s) within your company will use the tools and guidance provided in the EHNAC Privacy and Security Compliance Toolkit to customize the policies, procedures and forms, especially for your organization. These materials have been aligned with EHNAC programs for ease of use for those organizations desiring to gain EHNAC program accreditation as well. Gaining accreditation is a separate process, but one which will require your organization to have in place the policies, procedures and compliance documentation which can be prepared with the aid of this toolkit.

*NOTE: Customization of these materials alone will not make your organization compliant. Your organization must abide by the implemented procedures. Doing so will ensure that your organization handles sensitive health information in the most secure manner possible.

What to expect

Complete (or oversee completion of) the following four steps that are fully described in this Toolkit:

The toolkit offers detailed analysis and reports to measure, track and demonstrate your organization's compliance across mandated privacy and security regulations.

For additional information about the toolkit, contact info@ehnac.org or call Debra Hopkinson, VP of Operations at 860-408-1620.
Below are several snapshots of the included reports:

**Policy Review Checklist**

This form may be used by the individual within your organization who is tasked with policy customization and initial implementation as policies are reviewed and customized for [BUSINESS ASSOCIATES].

**Contingency Plan**

This template has been adopted from NIST Special Publication 800-56A Revision 1 - An Architecture Model for Implementing the Health Insurance Portability and Accountability Act Security Risk Analysis. Select the tailored tool in each section and explain a deviation in the event of an emergency.

1. Applications and Data Criticality Analysis

   - Prioritize the systems in order of importance.
   - Identify the criticality of each application and data in support of the plan.
   - Identify the potential impact of each application and data on the overall operation of the organization.
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2. Mitigation Strategies

   - Prioritize the systems in order of importance.
   - Identify the criticality of each application and data in support of the plan.
   - Identify the potential impact of each application and data on the overall operation of the organization.
   - Identify the potential impact of each application and data on the overall operation of the organization.
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**Sample Breach Notification Letter**

(Date)

To: [Name]

Re: Notice of Alleged Data Security Breach

We regret to inform you that our organization has experienced a data security breach involving [describe the nature of the breach].

What happened?

On [date], our [system] was accessed in an unauthorized manner. Without further investigation, it is not possible to describe the extent of the unauthorized access.

Impact on You

As a result of the breach, your [personal information] may have been compromised.

What to Do

- Change your password immediately.
- Be vigilant for any unusual activity.

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When privacy, security and confidentiality of healthcare data is on the line, a trusted name is a game-changer in today’s marketplace. EHNAC accreditation has been trusted and respected in the industry for more than 25 years.

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The best money we’ve ever spent!

Rob Collins
General Counsel
4C Health Solutions

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