

BUSINESS CASE

TURN HIPAA COMPLEXITY INTO HIPAA COMPLIANCE

In today's increasingly paperless world, protecting the privacy and security of patient information has become an exhausting challenge for Healthcare Providers. Complex, ever-changing regulations, increased vulnerabilities and lack of policy make it hard to stay in front of emerging threats.

Recognizing the urgency, officials from both Northwestern Medical Center and Alliance Community Hospital, two community hospitals providing quality care for more than a century each, turned to BlueOrange Compliance for help.



QUICK FACTS:



Over 30 million electronic medical records have been compromised since 2009



Penalties can be up to \$1.5 million over the course of a calendar year



1 in 5 hospitals receiving Meaningful Use funds will be audited

► CHALLENGES

For Northwestern Medical Center and Alliance Community Hospital, protecting patient health has always been the priority. But in an increasingly paperless world, protecting patient privacy and the security of their electronic medical and billing records is becoming nearly as critical.

Healthcare providers are ethically and legally obligated to respect patient confidentiality. Facilities, networks and workstations all need to be protected against human error, unauthorized access and external attacks. Federal-funding requirements, and the steep penalties affiliated with the HIPAA security rule have made it all the more important to adhere to the letter of the law.

Industry breaches are mounting at an alarming rate. Breach reporting requirements tied to Meaningful Use incentives have revealed more than 900 incidents compromising the personal information of about 30 million individuals since 2009. Hackers recognize the valuable information contained in Healthcare related files, and are on the hunt for new, unprotected targets.

Unfortunately, keeping up with complex regulations intended to safeguard patient information is a time intensive and often ambiguous process. The HIPAA Security Rule alone includes over 60 components that are measured against 100+ controls established by the National Institute of Standards and Technology.

At Northwestern Medical Center, a 70-bed community hospital in Vermont, employees were working to improve compliance by comparing their policies and procedures to government regulations. IT Managers instituted new policies and processes designed to protect information, but did not have the benefit of knowing which practices had been proven effective and practical elsewhere.

The case was much the same when Alliance Community Hospital began to beef up security in preparation for its own Meaningful Use attestation. “As a small, community hospital, we have a small IT team that has to take care of day-to-day functions,” says Daniel Yarian, Information Technology Director for Alliance Community Hospital. “We couldn’t even consider doing this ourselves.”

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Daniel Yarian
*Information Technology
Director for Alliance
Community Hospital*

▶ COMPANY PROFILES



Northwestern Medical Center

St. Albans, Vermont

A not-for-profit primary care hospital with satellite services that include 2 urgent care centers, lab and diagnostic facilities and 20+ provider practices.

750 FULL-TIME
staff members

725 WORKSTATION
devices deployed

6,000 surgical/outpatient procedures,
50,000 imaging exams and **300,000**
lab tests performed annually

EMR STATUS

- Converted to EMRs in 2009 using Meditech's 6.0 platform. Received Stage 1 Meaningful funding; applying for Stage 2.

Visit Northwestern Medical Center at www.northwesternmedicalcenter.org



Alliance Community Hospital

Alliance, Ohio

A not-for-profit hospital licensed for 204 patient beds, including an attached 68-unit long-term care center. Affiliates include a home medical supply company, DASCO Medical Equipment; Alliance Visiting Nurse Association & Hospice; a Family Care Urgent Care Center and several physician groups.

900 FULL-TIME
staff members

740 WORKSTATION
devices deployed

4,000 surgical/outpatient procedures,
30,000 imaging exams and **350,000**
lab tests performed annually

EMR STATUS

- Began converting to EMRs in 2010 using Meditech's 6.0 platform. About 50 percent of the community hospitals' records have been digitized, with a goal to complete the remaining half shortly. Applying for Meaningful Use funding for 2015.

Visit Alliance Community Hospital at www.achosp.org

► SOLUTION

Improved security depends on knowledge and understanding. BlueOrange Compliance begins its work by providing a comprehensive, low-touch assessment. Experienced staff well-versed in Healthcare I.T. security evaluate existing EMR procedures and risks, and look for physical or process deficiencies that might allow unintended access.

The initial assessment process moves quickly, relying on efficient data collection and the up-to-date industry knowledge of BlueOrange Compliance staff to address all areas of potential concern. The entire effort is customized to meet each Healthcare organization's unique business practices, needs and priorities. In a matter of weeks BlueOrange provides an easy-to-read snapshot that identifies key areas for remediation and establishes a realistic improvement plan to be executed during the balance of the year. The assessment also indicates how an individual company or facility stacks up against its peers.

► RESULTS

Before contracting with BlueOrange, Northwestern Medical Center might have spent six to eight months developing a single policy by committee, only to find it needed revision to meet the next year's guidelines. BlueOrange has provided Northwestern Medical Center with several policies, including how to categorize data and determine a system for prioritizing system back-ups.

"The BlueOrange Compliance report card tells me where to focus my time," says Joel Benware, Vice President of Information Systems and Compliance at Northwestern Medical Center. "There's so much out there, I use the report to figure out where to put my energies." BlueOrange also provided Alliance Community Hospital with policy and process support. Alliance Community Hospital has now instituted BlueOrange policies on workstation security and access termination.

After the initial assessment, BlueOrange Compliance monitors and guides remediation progress, providing advice and support throughout the process. Additionally, clients are furnished with access to BlueOrange experts who are often the first to learn about new industry standards, or what questions auditors may be raising.

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► DUE DILIGENCE

While vigorous security and privacy practices ultimately protect patients, they're not the only ones who expect high standards. Multiple government agencies are tracking HIPAA compliance and auditing daily practices. The HHS Office for Civil Rights, State Attorneys General, the U.S. Department of Justice and CMS all have jurisdiction.

BlueOrange Compliance estimates about 1 in 5 hospitals receiving Meaningful Use funds have been subjected to a random audit. CEO John DiMaggio expects those who haven't benefited from CMS incentives will also face increased scrutiny as the Office for Civil Rights ramps up a newly developed auditing program. "Any Healthcare organization that is governed by HIPAA, including business associates can be a target," says DiMaggio.


When it comes to penalties, due diligence can make the difference between a \$100 fine and a devastating \$1.5 million fine per calendar year. In 2014, the U.S. Department of Health and Human Services reached a record \$4.8 million settlement with New York and Presbyterian Hospital and Columbia University following a breach. The penalties were steep because neither entity took the technical precautions needed to protect a shared server.


When implemented correctly, a system of regular assessments, strong policies and strategic follow-up actions become important defenses against civil liabilities and onerous government corrective action, and also works to maintain and enhance an organization's integrity and reputation.

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John DiMaggio
Co-founder and CEO of
BlueOrange Compliance

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