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| **HIPAA CHECKLIST** |
| 1 – SCOPE |
| ☐ Identify the people, processes, and technology that support your business         ☐ Identify the HIPAA rules (there are 3 rules)         ☒ Security Rule                – Mandatory for all organizations handling Electronic Protected Health Information (ePHI)         ☐ Privacy Rule (If answered yes to any of these questions)                – Are you a covered entity?                – Are you a health care provider?                – Are you a health plan or clearinghouse?         ☐ Breach Notification Rule (If answered yes to any of these questions)         – Are you a covered entity?         – Are you a health care provider?         – Are you a health plan or clearinghouse |
| 2 – GAP ANALYSIS |
| ☐ Identify your current documentation posture         ☐ Have you specified and properly documented the activities and procedures that make up your company’s control environment?         ☐ Do you review documents on a regular basis to make sure they are up to date and accurate?         ☐ Do you retain documents for at least six (6) years?  ☐ Identify your current control environment posture         ☐ What is the organization’s governance structure?         ☐ What are the executive leadership and management tone and example?         ☐ Have you designed and implemented hiring and exit procedures?         ☐ What are the executive leadership and management tone and example?         ☐ How are personnel who are implementing or directing internal controls evaluated for competency?         ☐ Are possible threats being identified?         ☐ Have you put any mitigating plans in place?         ☐ Do you have a protocol for dealing with incidents and a disaster recovery plan in place?         ☐ What kind of management supervision and governance do you have in place for your control the environment and reporting events, security problems, and fraud?         ☐ Do you have a Business Associates Agreement (BAA) template for contact with all your vendors and subcontractors?  ☐ Identify your current security environment posture         ☐ Do you have access limited to positions that need it, with the appropriateness of the access? given being reviewed on a regular basis?         ☐ Do you have policies in place for giving and taking away access from workers, customers, and other parties?         ☐ Do you encrypt data while it’s in transit and while it’s at rest?         ☐ Do you impose restrictions on administrative access to the technological stack?  ☐ Identify your current risk mitigation environment posture         ☐ Have you conducted vulnerability assessments or penetration testing regular basis to detect weaknesses in your environment?         ☐ Do you have backup processes in place?         ☐ Do you test your disaster recovery procedures on a yearly basis to guarantee that you can restart  operations in case of a calamity?         ☐ Do you regularly check for intrusion attempts, system performance, and availability?  ☐ Identify your current system changes environment posture         ☐ Are system modifications tested and authorized before they are implemented?         ☐ Do you inform your employees about system changes?         ☐ Are your controls being monitored on a regular basis?         ☐ Have you enabled notification of settings changes?         ☐ Is your technology up to date in terms of upgrades?         ☐ Do you have a system in place for separating development and production tasks?  ☐ Identify your current remote working environment posture         ☐ Is technology being used uniformly across all employee locations?         ☐ Do you provide staff with regular security awareness training, address data privacy in common spaces, use secure connections while working from home, and raise awareness of phishing attempts?         ☐ Do you use multifactor authentication to get into your company’s network and other systems?         ☐ Have you deployed mobile device management to make sure that mobile devices are encrypted and authenticated? |
| 3 – CONTROL IMPLEMENTATION |
| ☐ Design the controls to address your gaps  ☐ Implement controls to address your gaps  ☐ Test the controls to ensure that they are operating effectively. |
| 4 – AUDIT READY |
| ☐ Identify the auditor  ☐ Initiate kick-off to set expectations  ☐ Grant them access to TrustCloud. |
| 5 – MAINTENANCE |
| ☐ Maintain the program to show continuous compliance via TC integrations |