

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