

ARTICLE 8 SMALL GROUP HEALTH PLAN HIPAA SECURITY COMPLIANCE

ONGOING COMPLIANCE AND EVALUATION

Now the real work begins. Don't let all of your hard work go by the wayside because you don't enforce Compliance! Make sure to perform ongoing evaluations of your Compliance. CMS has published the following language in Frequently Asked Questions (FAQ)'s on this issue:

“Compliance is not a one-time goal, it must be maintained. Compliance with the evaluation standard at § 164.308(a)(8) will allow covered entities to maintain compliance. By performing a periodic technical and non-technical evaluation a covered entity will be able to address initial standards implementation and future environmental or operational changes affecting the security of electronic PHI.”

Consider the following sample language (provided by The Clayton Group) for your Evaluation Policy Document:

1. [Your Group Name] will perform a routine and periodic (every six months, once a year, once every two years) technical and non-technical (operational) review of all of [Your Group Name]'s Policies and Procedures resulting from the initial Risk Analysis and general Risk Management Program. This initial evaluation will take into consideration initial [Your Group Name] enterprise status and its resulting early interpretation of the Administrative Simplification Security components. This will be [Your Group's Name] benchmark evaluation.
2. The same review will subsequently be undertaken periodically and whenever environmental or operational changes affecting the Protected Health Information secured by [Your Group Name] occur. The benchmark evaluation will be used as the beginning of the second review.

Now add your own procedures and remember...this is not a one-time goal. Make sure to implement a strong maintenance/auditing process to maintain your organizations HIPAA Security compliance today!

Group Benefit Services, Inc. has once again employed a HIPAA Consultant to help us through our Risk Analysis as well as assisting us in the preparation for internal training, completing our Policies and Procedures and developing documentation for our clients. GBS has been working with Lesley Berkeyheiser, of The Clayton Group, since last spring on HIPAA Security and how the regulations affect a TPA. We are pleased to be able to offer her consulting services to you as well.

Keeping you informed. Just one more reason to choose GBS.