

Gaston County's HIPAA Security Risk Assessment Journey

About

Gaston County is a county in the state of North Carolina, with a population of approximately 210,000. Chris Dobbins is the Director of the Gaston County Department of Health & Human Services. He holds a Master of Public Health degree from UNC Chapel Hill and is also a graduate of the FBI National Academy. Chris served 22 years in the United States Air Force before retiring in 2004. In January of 2017, Chris was named the Health Director of the Year by the North Carolina Association of Local Health Directors.

Logically provides IT support for both the Health Division's staff of 200 and the Social Services Division's staff of 400. Each division has a director that reports to Chris Dobbins. The County's IT charter is straight forward: ***"For the betterment of Gaston County through the use of technology, and***

to ensure that the County data and voice services are secure, accurate, available and recoverable." Logically is the trusted partner to help make that goal a reality.

IT Challenge

Five years ago, there was an increase in breaches of electronic protected health information (ePHI) in North Carolina and the country. Driven by the rush to implement electronic health record (EHR) systems fueled by meaningful use incentives, it was a perfect storm of risk. Broadly, EHR systems were implemented for ease of use and not security best practice. This made all covered entities tempting targets by the threat actors. While Gaston County considered their security efforts to be better than most, they were aware of this new risk. As such, they engaged in a vendor review process to ameliorate the problem. Chris Dobbins selected Logically as the county's IT partner and the relationship began with the county's first HIPAA Security Risk Assessment (SRA) focusing on the Gaston County Health Department.

"We were very impressed. Logically was customer-friendly and quickly found areas for us to improve. They provided the expertise that only an outside agency could deliver"

CHRIS DOBBINS | Director of the Gaston County Department of Health & Human Services

What follows is an in-depth interview with Chris Dobbins:

Q: Understanding that a HIPAA Security Risk Assessment is required by law and further specified by other initiatives including Meaningful Use and MIPS/MACRA, what was the core driver for Gaston County Health & Human Services to implement a review of their HIPAA requirements?

A: When we began looking into improving our HIPAA security, there were several national HIPAA breaches in various systems and our state was trying to figure out how to respond. Until this point, most public health entities were self-inspecting their own QA/QI procedures. We went through a state-led accreditation process, but there was no process for an outside review.

I was attending a public health conference and came across a vendor presentation around security risk assessments and the benefits of having a third party to assess our security. We decided to move forward with Logically and in turn, they gave us a road map for protecting ourselves and the Protected Health Information (PHI) we mange.

While the potential for a breach is always there, if you've done things to protect your information, train your staff, and put policies into place, you are protected from increased fines and you can reduce your liability. Logically helped do this for us.

Q: Knowing that Logically helped you achieve compliance with the HIPAA Security Rule, to what level have they helped Gaston County HHS achieve the more important goal of building and preserving client trust through protection of their ePHI?

A: People don't think about their protected information until something bad happens, so the fact that our clients and patients aren't really thinking about this is a good thing. We,Ã¢re preserving client trust by assuring that we don't lose it to begin with.

Q: In what ways did you not expect Logically to help you secure your environment and very personal, client PHI?

A: I don't think I was expecting the level of customer service and passion in protecting our assets. This clearly wasn't just a job; Logically took their work very seriously and worked side-by-side with us to put long-term solutions in place to minimize liability.

Q: Why do you continue to engage with Logically year over year? Why did you decide to charge them with the responsibility to start assessing DSS?

A: We feel it is a best practice to have a third-party review because it's hard to self-assess when you are overly familiar with your practices. Having an extra set of eyes come in and give you a current, technical review prevents complacency or familiarity that may not catch what a professional can with fresh eyes.

We have been very satisfied with results on our public health side and because our public health and social services sides work so closely together, we felt it was important to ensure our entire agency was in compliance.

Q: From your perspective, what is unique about Logically's ability to work well with HHS and IT staff to seamlessly identify risk in a comprehensive way?

A: They are able to speak both languages and translate IT information into public health language and vice versa. Not everyone has that skill set.

Q: What exactly gives you such an incredible confidence in Logically's technical and compliance expertise?

A: I have great confidence as Logically is very thorough and very responsive. Logically's approach is hands on. They come on-site, they walk you through the management plan and guide you throughout the year while you are working through the vulnerabilities. They also engage with IT and include them in the assessment, review and management. It brought more awareness to the HIPAA responsibilities throughout the county.

Q: What new rules/strategies have you put into place as a result of the HIPAA assessment? Did Logically help you "change the culture of HHS and IT Staff" to value security and privacy of PHI (electronic and paper)

A: As a result of the HIPAA Security Risk Assessment, the Gaston County Department of Health and Human Services has adopted the following new strategies and processes:

- Gaston County Department of Health and Human Services (HHS) and IT implemented a new Security Training Policy which includes more security awareness and training. This strategy included Gaston County's HIPAA Security Officer presenting at Public Health Annual Training, Gaston County IT providing ongoing Security Trainings via email, a poster and education campaign for the entire county and communicating security training tips along with updates during staff meetings.
- Gaston County HIPAA Privacy Policies, HIPAA Security Policies, and DHHS-PH policies reviewed by Logically have assisted our county with keeping current and up-to-date with new rules and HIPAA privacy and security laws. This review process also assisted Gaston County HHS with understanding what new policies are needed and those that may be combined. Logically helped change the culture of our HHS and IT staff to focus on procedures to enable the continuation of critical business processes and for protection of ePHI while operating in the emergency mode. We began to look closely at our Disaster Recovery Plan specific to Electronic Health Record (EHR) data.

- We are now looking at our contingency plan and have future plans on training along with exercises to test this plan.
- HIPAA privacy and security is becoming the everyday language in all our HHS duties and the shift in this culture helps maintain a sense of awareness and prevention.

Q: In the future, what will be most important for your organization when it comes to handling and protecting PHI?

A: That we are aware of and are using the most updated hardware, software, and security materials to protect us against the ever-evolving cyber warfare targeting this sensitive information.

Q: What was different about the Logically HIPAA SRA? Was it the process, the reporting, or the “partner approach” to conducting the assessment?

A: We fully appreciate the side-by-side, partner approach, stepping us through what was working and what needed improvement. It was never condescending, but rather encouraging and supportive through a process where we needed to approve.

Q: How do you feel about the level of involvement of your entire team (sales, audit and project management)?

A: We appreciate Logically's customer service and responsiveness. Beyond their esteemed reputation across NC, this was the single most important factor that lead us to choose Logically for such an important task.

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