

Service Description

Health Insurance Portability and Accountability Act
Remediation Consulting

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HIPAA Remediation Consulting

SecureTrust™ is a division of Trustwave Holdings, Inc.

SERVICE DESCRIPTION

SecureTrust's Health Insurance Portability and Accountability Act (HIPAA) Remediation Consulting service is a professional services engagement. The HIPAA Remediation Consulting service is designed to provide assistance and guidance in achieving and maintaining compliance with the HIPAA Security, Privacy and Breach Notification Rules.

BASE SERVICE FEATURES

SecureTrust's HIPAA Remediation Consulting service includes the following standard features:

SecureTrust Portal

The SecureTrust Portal consists of, among other features, a Compliance Manager application to manage the engagement process as well as collect and securely store evidence, documentation, and final deliverables.

Global Compliance & Risk Services

The Global Compliance and Risk Services (GCRS) team consists of, among others, the following key personnel and functions:

Security Consultant – An information security consultant is the primary resource for the fulfillment of the service and is responsible for scheduling and conducting consulting activities.

Managing Consultant (MC) – An MC to provide guidance, project oversight and reporting quality assurance to the Security Consultant and serve Client as a secondary point of contact for escalations and queries.

HIPAA General Consulting – Consulting and guidance for achieving and maintaining to achieve compliance with the HIPAA Security, Privacy and Breach Notification Rules. SecureTrust will work with Client resources to develop prioritized action plans and processes for remediation.

DELIVERY AND IMPLEMENTATION

Project Initiation

The SecureTrust GCRS team is assigned to facilitate delivery of the service which includes scheduling and conducting the remote kickoff meeting to define and agree to high-level project plan milestone dates, key steps, estimates for duration, deliverables, resource requirements and escalation procedures.

Remote Consulting Engagement

SecureTrust's security consultant will work with Client and provide guidance and recommendations to create prioritized action plans and target processes for remediation. Remediation Consulting service activities may include working with Client to:

- Create a remediation action plan for each ineffective safeguards.
- Design processes and projects to remediate known gaps for high priority or high risk areas.
- Leverage common safeguards across Client's Protected Health Information (PHI) environment to remediate identified gaps.
- Determine audit evidence and documentation needed to prove compliance.
- Identify Client's key challenges and risks associated with achieving HIPAA compliance.
- Establish self-assessment procedures to be executed by safeguard owners for high priority areas.

SecureTrust will conduct a closeout meeting with Client.

SECURETRUST RESPONSIBILITIES

- Establish and maintain contact with Client.
- Establish communication and escalation plans.
- Create a Client account in the SecureTrust Portal.
- Define high-level project plan consisting of milestone dates, key steps, estimates for duration and resource requirements.
- Schedule and conduct kickoff, periodic status and closeout meetings.

CLIENT RESPONSIBILITIES

- Establish and maintain contact with SecureTrust.
- Establish communication and escalation plans.
- Agree to high-level project plan consisting of milestone dates, key steps, estimates for duration, deliverables and resource requirements.
- Accurately provide all necessary information including key stakeholders, applicable Client environment information and configuration requirements.
- Inform SecureTrust of all Client environment maintenance activity and changes that may impact the service.
- Accurately respond to requests from SecureTrust teams when establishing contact and collecting information.
- Provide complete and accurate details of the relevant environment and other business operations information.
- Make available resources capable of participating in consulting activities.
- Participate in and understand materials explained during calls, meetings, interviews, discussions, facilities inspection and controls analysis.
- Client acknowledges:
 - All security and feature updates for SecureTrust Portal software will be included in major version release upgrades.
 - The engagement consists of remote consulting activities.
 - SecureTrust may request evidence from Client's systems and processes as required to prove compliance with any specific requirements. Client agrees to provide all such evidence in a timely manner.

- SecureTrust is not responsible for defining systems in scope or whether information provided by Client is accurate.
- SecureTrust retains the right to reject or accept Client comments based on the facts and circumstances of the service.
- SecureTrust will perform the service in the English language.
- SecureTrust will not offer any legal guidance or counseling. The provision of HIPAA Remediation Consulting does not guarantee compliance with data privacy regulation. Client is responsible for making all management decisions with regard to its data privacy policies.
- The quality and accuracy of the service is dependent on Client's provision of accurate information and access to Client systems and resources to SecureTrust.