

Update on HIPAA Security Rule Compliance May 2006

Delta Dental has designated HIPAA compliance as one of its top corporate priorities. We have created a HIPAA committee, under the direction of an executive that reports regularly to senior management. Delta Dental is engaged in a long-term, enterprise-wide project to comply with the HIPAA administrative simplification mandates.

Delta Dental has completed the implementation of solutions that meet the Security rule standard.

Below is a matrix of the standards and specifications of the rule and the status of our implementation.

HIPAA Security Standards Matrix

Legend:

❖ :

(R) Required or (A) Addressable per the Security Rule

Status:

C = Complete. Existing Delta Dental practices already meet or have been modified to meet the Security Rule standard.

AU = Existing Delta Dental practices are being augmented to meet the Security rule standard.

IP = In Progress. New policies, procedures or processes are being implemented to meet the standard.

Standard	Specifications	❖	Status	Comments
<i>Administrative Safeguards</i>				
Security Management Process	Implement policies and procedures to prevent, detect, contain, and correct security violations.	R	C	
	Risk Analysis	R	C	
	Risk Management	R	C	
	Sanction Policy	R	C	
	Information System Activity Review	R	C	Compliant for critical enterprise systems.
Assigned Security Responsibility	Assigned Security Responsibility	R	C	
Workforce Security	Implement policies and procedures to ensure that all members of its workforce	R	C	

Standard	Specifications	❖	Status	Comments
	have appropriate access to e-PHI, and to prevent those workforce members who do not have access from obtaining access to e-PHI.			
	Authorization and/or Supervision	A	C	
	Workforce Clearance Procedure	A	C	
	Termination Procedures	A	C	
Information Access Management	Implement policies and procedures for authorizing access to e-PHI.	R	C	Complete, as applicable to operations
	Isolating Health care Clearinghouse Function	R	N/A	This implementation specification is not applicable to Delta Dental's operations.
	Access Authorization	A	C	
	Access Establishment and Modification	A	C	
Security Awareness and Training	Security Awareness and Training	A	C	
	Security Reminders	A	C	
	Protection from Malicious Software	A	C	
	Log-in Monitoring	A	C	
	Password Management	A	C	
Security Incident Procedures	Implement policies and procedures to address security incidents.	R	C	
	Response and Reporting	R	C	
Contingency Plan	Establish and implement policies and procedures for responding to an emergency or other occurrence that damages systems that contain e-PHI.	R	C	Delta Dental's longstanding business continuity and readiness program was reviewed and determined to meet the requirements of this standard. Continued reviews and exercises will be conducted
	Data Backup Plan	R	C	Delta Dental's longstanding business continuity and readiness program was reviewed and determined to meet the requirements of this standard.
	Disaster Recovery Plan	R	C	
	Emergency Mode Operation Plan	R	C	
	Testing and Revision Procedure	A	C	
	Applications and Data Criticality Analysis	A	C	
Evaluation	Evaluation	R	C	
Business Associate Contracts and Other Arrangement.	A business associate may be permitted to create, receive, maintain, or transmit e-PHI on the covered entity's behalf only if	R	C	Processes put into place in compliance with the HIPAA Privacy rule have been revised.

Standard	Specifications	❖	Status	Comments
	the covered entity obtains assurances, that the business associate will appropriately safeguard the information.			
	Written Contract or Other Arrangement	R	C	Agreements put into place in compliance with the HIPAA Privacy rule have been revised.
Physical Safeguards				
Facility Access Controls	Implement policies and procedures to limit physical access to its electronic information systems and the facility or facilities in which they are housed, while ensuring that properly authorized access is allowed.	R	C	Delta Dental's longstanding facility security processes were reviewed and determined to meet the requirements of this standard.
	Contingency Operations	A	C	
	Facility Security Plan	A	C	
	Access Control and Validation Procedures	A	C	
	Maintenance Records	A	C	
Workstation Use	Workstation Use	R	C	Procedures that were extensively reviewed during our HIPAA Privacy implementation were supplemented.
Workstation Security	Workstation Security	R	C	Safeguards that were extensively reviewed during our HIPAA Privacy implementation were supplemented.
Device and Media Controls	Implement policies and procedures that govern the receipt and removal of hardware and electronic media that contain e-PHI into and out of a facility, and the movement of these items within the facility.	R	C	
	Disposal	R	C	
	Media Re-use	R	C	
	Accountability	A	C	
	Data Backup and Storage	A	C	
Technical Safeguards				
Access Control	Implement technical policies and procedures for electronic information systems that maintain e-PHI to allow access only to those persons or software	R	C	Delta Dental's longstanding user identification processes were reviewed and determined to meet the requirements of this standard.

Standard	Specifications	❖	Status	Comments
	programs that have been granted access rights.			However, as improved technologies become available, Delta Dental will continue to review and assess the system capabilities to further refine its processes.
	Unique User Identification	R	C	
	Emergency Access Procedure	R	C	
	Automatic Logoff	A	C	
	Encryption and Decryption	A	C	
Audit Controls	Audit Controls	R	C	Compliant for critical enterprise systems.
Integrity	Implement policies and procedures to protect e-PHI from improper alteration or destruction.	R	C	Compliant for critical enterprise systems.
	Mechanism to Authenticate Electronic Protected Health Information	A	C	
Person or Entity Authentication	Person or Entity Authentication	R	C	
Transmission Security	Implement technical security measures to guard against unauthorized access to e-PHI that is being transmitted over an electronic communications network.	R	C	
	Integrity Controls	A	C	Supporting trading partner deployments.
	Encryption	A	C	Supporting trading partner deployments.