The purpose of the SilverSky HIPAA Gap assessment service is to identify potential gaps that may exist in the Customer's ongoing compliance efforts. The assessment procedures are based on the HIPAA Security Rules as updated by the HITECH Act and the Omnibus Rule. This project will focus on the Customer's policies, procedures, practices, information technology (IT) environment and existing compliance efforts. SilverSky will document identified weaknesses and provide recommendations to help the Customer enhance its security and compliance program.

Project Deliverables:

Reports: Executive Summary and HIPAA Gap/Readiness Detailed Findings Report

1.2   Project Summary

SilverSky will provide the following primary tasks, subject to modification or extension based on the engagement.

1.   Pknj/TT8Tw 1.24 0 Td(u. T0.001 Tc -0.001 Tw 1.87 Td[C)0.7(u)-0.7(s)-1.3 (t)2.7(o)1.3 (me)-1 (r)Ṯ-0.003 Tc 0.003 Tw 3.90 Td('s)Tj0 Tc 0 Tw 0.64 0 Td( )T)TjM(i)3.3(r)3.40 Tw 0.64 0 Td(h)-0.6 (at)2.6r

roup
PAA

HIPAA Gap Analysis - Evaluate the in-scope processes, systems and applications against the requirements of the HIPAA Security and Privacy Rules. SilverSky will examine these against the security and control structure or related information systems and business processes that are involved in the Customer's collection, use and disclosure of PHI/ePHI to determine their compliance. During this phase SilverSky will:

- Assess how PHI/ePHI is collected, used and disclosed throughout the key business, technology infrastructure, relevant systems and business processes
- Interview key system and business stakeholders to identify current policies and practices related to PHI/ePHI
- Identify and assess information security risks within key functional areas associated with PHI/ePHI
- Learn Customer's current risk management techniques for addressing security and privacy risks
- Identify deficiencies and gaps in Customer's security and privacy practices through targeted tests and control analysis
- Develop detailed recommendations to remediate deficiencies

SilverSky will assess against the HIPAA Security Guidelines and NIST 800-66: Resource Guide for Implementing the Health Insurance Portability and Accountability Act (HIPAA) Security Rule which includes:

Administrative Safeguards
- **Security Management Process**
- **Assigned Security Responsibility**
- **Workforce Security**
- **Information Access Management**
- **Security Awareness and Training**
- **Security Incident Procedures**
- **Contingency Planning**
- **Evaluation**
- **Business Associate Contracts**

Physical Safegu(Assig)1Assigocg

Project Component	Parameter(s)