

Flex Benefits HITRUST Case Study

ABOUT FLEX BENEFITS

Flexible Benefit Service LLC, or Flex, is a wholesale insurance distributor and third-party benefits administrator. Flex contracts with independent insurance brokers and/or brokerages and with employers to provide employee benefit solutions. Flex's mission is to be a pioneer in the employee benefits and healthcare industry by creating and recommending unique, cost efficient ways to purchase or provide insurance and other benefits.

THE HEALTHCARE DATA SECURITY CHALLENGE

Let's face it: Not many people would be eager to engage in a very detailed business process that requires abundant company resources.

But one of the insurers Flex wanted to work with needed to be sure Flex's data was safe, so Flex executives decided to pursue HITRUST certification. They knew the process to receive certification was rigorous and would ensure Flex and those companies they worked with would become much more secure.

"Flex has used Intraprise Health for a number of services since 2018, including assisting with security risk assessments, penetration testing and consulting. Flex more recently worked with Intraprise Health to prepare for HITRUST certification. Flex's ability to outsource several aspects of their IT security to Intraprise Health was in fact a selling point for them."

Christopher King is Flex's director of IT and the company's security officer. He and David Lindgren, senior manager, oversaw the internal HITRUST process and were primary contributors. They chose Intraprise Health after finding and researching several vendors listed on the HITRUST website.

"We liked Intraprise Health's tenure and experience. We felt like they were on our team and would be good to work with," said Christopher. "And they were."

CERTIFICATION TIMELINE

Flex started working in earnest on certification in April, 2020. They had several four- and five-hour calls with Intraprise Health, who worked with them to develop their policies and processes so they would adhere to HITRUST requirements.

In December, 2020, Flex signed a three-year contract with Intraprise Health, to guide them through the recertification process. Flex will also use Intraprise Health's HIPAA One® software to perform a security risk assessment each year for the next three years, another testament to Flex's belief that Intraprise Health has multifaceted, and proven IT security expertise.

Typically, companies seek interim certification, not recertification, after receiving certification. But since Flex downsized their office to allow for remote work due to the pandemic, which HITRUST considers a significant change in operations, they now need to seek recertification. They

must demonstrate they maintain physical and environmental security at their new office.

Unlike some companies that view HITRUST certification as an annoyance, Intraprise Health Customer Success Manager John Toner says Christopher and David ran a fantastic program and understand the HITRUST philosophy, framework and what it seeks to accomplish.

John also says Flex's corrective actions constitute less than 10 percent of their 300 requirements, which, from his perspective, is "fantastic" and a tribute to their detail-oriented work.

Taking advantage of the HITRUST Inheritance Program will

TIMELINE

- **April 2020**
Flex begins working with Intraprise Health on HITRUST certification.
- **October 2020**
Flex has all their documentation uploaded and waits for 90-day validation process.
- **December 2020**
Flex signs three-year contract with Intraprise Health to help with recertification.
- **January 2021**
Flex begins validation process.
- **March 2021**
Flex submits and receives HITRUST certification.

save Flex time in seeking recertification. The Inheritance Program allows Flex to use the controls that were not impacted by the move, eliminating the need to re-address requirements they have met or security gaps they have resolved, thereby saving time and resources.

“We’ve changed our mindset from, ‘We’ve got to do this because we’ve got a contract with an important client,’ to now, it’s something we believe in, we promote to people, we’re proud of,” David says of the certification process.

LESSONS LEARNED

While Christopher and David held multiple employee and manager training sessions on the impact HITRUST certification would have on their areas of work, they recognize that employees might not always remember all the moving parts. So they send out continuous reminders and provide ongoing training.

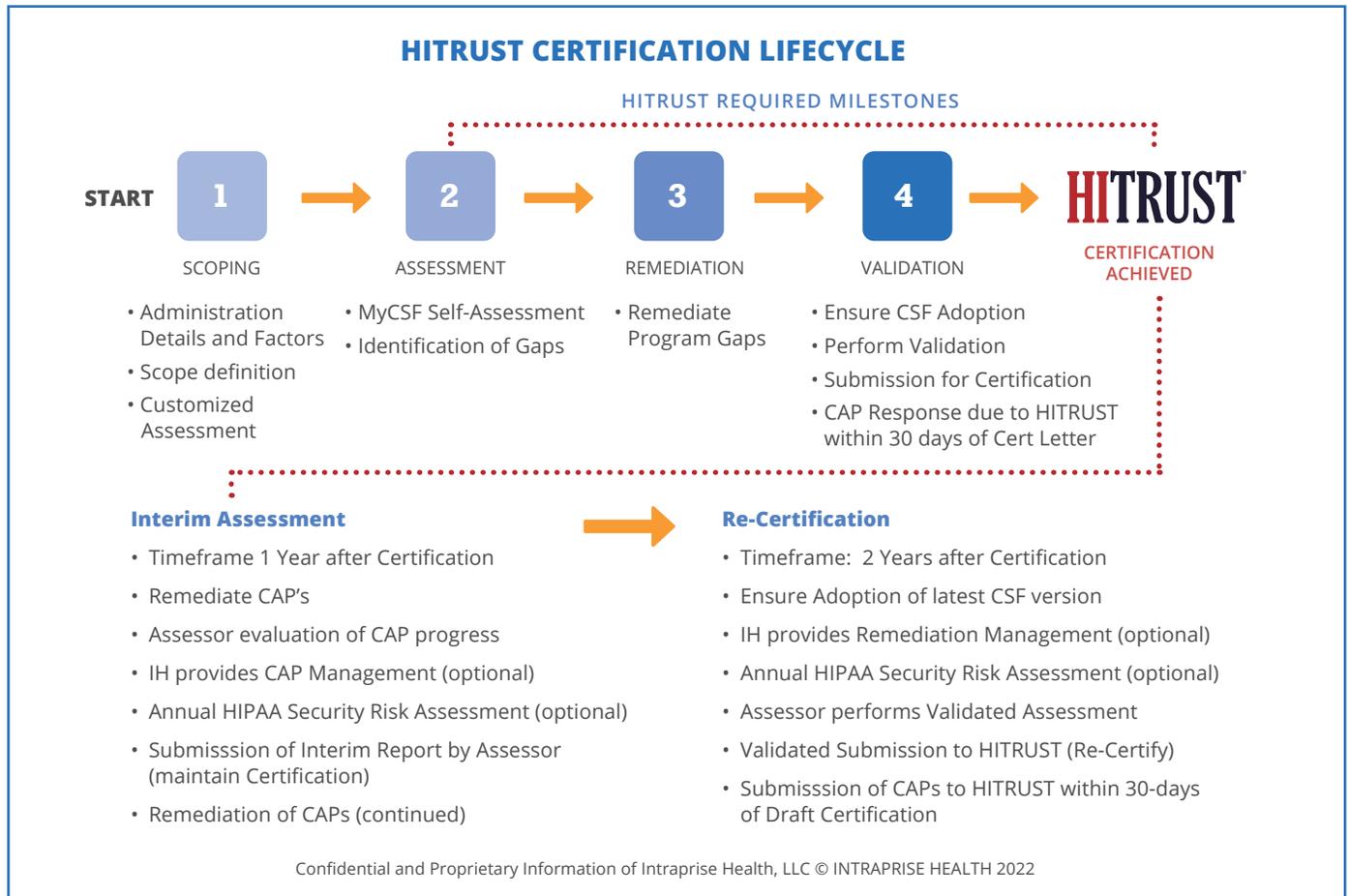
“Pristine record-keeping is needed,” David says. The process can feel chaotic, he adds, but he felt more organized and confident as it became more familiar. “It’s important to set deadlines and to stick to them,” he says.

A BIT ABOUT HITRUST

HITRUST is one of the most widely adopted control frameworks in the healthcare industry, is highly scalable and provides healthcare companies with a distinct competitive advantage.

The HITRUST CSF integrates and harmonizes data protection requirements from many authoritative sources — such as ISO, NIST, PCI, HIPAA, and SOC 2 — and tailors the requirements to each organization based on specific business, system and regulatory risk factors.

The level of integration and prescriptiveness provided by the framework, along with the quality and rigor of the HITRUST CSF Assurance Program, makes the HITRUST CSF an ideal choice for organizations seeking to map their security program to an industry standard or achieve an authoritative certification.



It's also important to maintain your focus on the process. Christopher and David were the primary employees working on HITRUST but they had other organizational roles which pulled them from their work with HITRUST. It was very difficult, they said, to come back to HITRUST, especially because things may have changed in the organization that impacted certification while they were away.

Also, if you don't have the internal capacity to accomplish certain tasks, Christopher and David recommend outsourcing it to a capable entity, as they did by outsourcing policies and processes to Intraprise Health.

And while it's a great goal to aim for perfect scores on everything, it's not necessary. What is necessary, is the proper and complete documentation required.

"As long as you're mostly perfect, you're good," David says. He adds that people often don't realize how much time the certification process will take. And it doesn't end when the company's certified.

A HITRUST MINDSET

"It is all about adoption of HITRUST CSF. Successful organizations consider the CSF requirements as they are making daily business decisions. They ask themselves,

"How will this impact HITRUST?" If the organizational culture shifts in that direction, then the security maturity level dramatically increases and the future HITRUST milestones such as the interim assessment become easier," said Ryan Patrick, Intraprise Health's SVP of Security Services.

David says he now spends 10-25 hours a week on audit reviews, documentation and other HITRUST tasks. Companies should be prepared for a major shift in mindset and productivity, he advises.

Chris and David are continually teaching and reminding employees what has changed with HITRUST certification and how it impacts their work. For instance, they can't just go sign a contract with a third-party vendor. They now need to perform a third-party review.

Gone, too, are the days when a call to the IT support office could help with an employee's computer issue. These days, they need to submit a ticket to the help desk. IT needs to be notified immediately when an employee is terminated and they need to remove access to the network.

"HITRUST certification should really be delegated to a group of people that can dedicate a significant amount of time to handle everything from start to finish," David says, adding the amount of time required will depend on where a company's security program is today.

"HITRUST never stops," Christopher says. "We gave ourselves a week or so off after we submitted, but then we were right back at it." ♦

ABOUT INTRAPRISE HEALTH

Intraprise Health is an industry leading "tech-enabled" healthcare cybersecurity and risk management services provider. One of the longest tenured HITRUST Assessors in the industry, our broad range of information security, privacy and compliance services include: HITRUST Certification, Third-Party Risk Management, NIST Cybersecurity Framework Adoption, Advisory and Planning Services, Remediation Management, Incident Response and Business Continuity. We deliver HIPAA Security Risk Assessments and Workforce Training via our HIPAA One® platform. Our next generation BluePrint Protect™ platform, based on the NIST Risk Management Framework, provides intelligent monitoring, workflow management and collaboration capabilities.