Encompass Health Automates Its HIPAA Compliant Risk Assessment & Strengthens Security Risk Management

Clearwater partnered with Encompass Health to implement its enterprise Risk Analysis and Cyber Risk Management Solution powered by IRM|Analysis™

The Problem

"I've found that performing a comprehensive, HIPAA-compliant risk analysis in a large healthcare organization is easier said than done," says Mitch Thomas, chief security officer (CSO) of Encompass Health. Thomas, who is also a reservist in the U.S. military, working within the U.S. Cyber Command, says he's seen many approaches to managing risk across government and industries.

Encompass Health had previously used multiple approaches to risk analysis with varying results. When Thomas came on board as CSO, Encompass Health was challenged in communicating risk and controls in a construct that could be aligned with regulations and OCR audit expectations.

"We needed to establish risk management processes that correlated directly with OCR guidance." One challenge Encompass Health faced was the vast scope and complexity of the organization. One of the nation's largest post-acute care providers, they offer facility-based and home-based patient care through a network of 127 inpatient rehabilitation hospitals and 237 home health agencies and hospice locations in 36 states and Puerto Rico.

Encompass Health manages an enormous volume of information assets that are widely distributed. Strategic acquisitions also mean that the scope of information assets, threats, vulnerabilities, and security controls continuously evolves. Thomas found that previous attempts at risk analysis did not consider the dynamic nature of the organization and external environment.

"We needed something more than a static, once-a-year risk analysis report," Thomas said. "We needed a process that would give us the ability to continuously adjust our risk analysis as we established new business lines, acquired new devices, and made changes to software."

The Solution

After participating in Clearwater's HIPAA Compliance and Cybersecurity BootCamp™, Thomas said he knew he had found what he was looking for.

"I wanted a solution that would tightly follow the NIST framework. At that first session, I saw that Clearwater's solutions not only followed the NIST framework, but also automated the process, making it much easier for an organization like Encompass Health to manage and maintain," Thomas said.

Clearwater's expert consulting team implemented IRM|Analysis® and conducted the initial risk analysis, allowing Encompass Health to automate an OCR-compliant risk analysis process while learning the software and NIST risk analysis methodology. "Clearwater's tool was the only user-accessible software I found that operationalized the NIST framework through automation and made it manageable to apply across our assets," said Thomas.

About Encompass Health

Encompass Health is one of the nation's largest providers of post-acute healthcare services, offering both facility-based and home-based post-acute services in 36 states and Puerto Rico through its network of inpatient rehabilitation hospitals, home health agencies, and hospice agencies. Facilities include 127 hospitals and 237 home health & hospice locations in 36 states and Puerto Rico.

About Clearwater

Clearwater, together with its CynergisTek subsidiary and TECH LOCK Division, helps organizations across the healthcare ecosystem move to a more secure, compliant, and resilient state so they can successfully accomplish their missions. We do this by providing a deep pool of experts across a broad range of cybersecurity, privacy, and compliance domains, purpose-built software that enables efficient identification and management of cybersecurity and compliance risks, and a tech-enabled, 24x7x365 Security Operations Center with managed threat detection and response capabilities.

Results

The entire process, from software deployment to completion of the risk analysis, was finished in six months. At the end of that period, Encompass Health had a complete, OCR-compliant risk analysis report, including findings, observations, and recommendations. Thomas said the implementation of Clearwater's software and process led to additional benefits, including:

Centralized risk data: "Having all of our assets and their risks reflected within one system simplifies how we manage and report security risk."

Real-time risk analysis: The organization is no longer dependent on static, point-in-time risk analysis, which quickly becomes outdated.

The ability to adjust risk tolerance: "As we address risk items and mitigate them, we are able to adjust our risk tolerance threshold to address even lower risk items. This helps the team manage and communicate security risk with leadership across the organization."

Easy report generation: IRM|Analysis makes it easy to generate up-to-date risk analysis reports for any entity that requests a risk analysis.

Increased confidence in risk analysis findings: "I have confidence now in how we are tracking our security risk from a compliance standpoint. Having current and detailed risk information all organized in one place provides me with the assurances I need that we are addressing our regulatory requirements. And I feel confident that we are also compliant with OCR guidelines."

What Encompass Health Says

"Clearwater was able to come in on day one, start the risk assessment process, and minimize the impact on my staff and others across the company. In just a couple of days, they accomplished what it would have taken us weeks to do on our own. Then they input all of that information into the software and worked with my team on how they did it, what that process was, and how to use the software. That gave us the momentum we needed to manage and maintain the process going forward."

Learn More

Whether you need help with risk analysis, responding to OCR, or a comprehensive approach to your cybersecurity and compliance program, we can help.