



## Risk Analysis and Risk Management Fuel Strong Security and HIPAA Compliance Programs

### The Problem

Vancouver Clinic (VC), based in Vancouver, Washington, has more than 400 physicians and other providers serving more than 1,000,000 patients annually in 11 locations throughout the southwest portion of the state, including an additional six urgent care centers for after-hours services. As a healthcare organization, VC has a wide range and large quantity of sensitive data it's responsible for securing, including, but not limited to, electronic patient health information (ePHI), personally identifiable information, and financial information.

Analyzing and managing risks across all of its locations—and for all of its systems that can receive, transfer, store, create or access ePHI—comes with many challenges. When Michael Bray, Chief Information Security Officer at Vancouver Clinic, first joined the team, he was responsible for building Vancouver Clinic's security program from the ground up—with an emphasis on HIPAA Privacy, Security, and Breach rules.

Among the daunting tasks he faced was conducting a full inventory of all of VC's assets, understanding the risks and vulnerabilities for those assets, and then building and implementing risk remediation and mitigation plans. He had to mature and manage information security risks effectively and routinely as the company, its employees, assets, and footprint expanded over time.

Bray says when he came on board, the company was using a risk assessment solution, but it was custom software that compounded his challenges, noting it was “grossly insufficient and difficult to manage.”

Bray knew there had to be a better alternative, so he opened conversations with a variety of risk management software vendors and services providers, including Clearwater. Across the board, Clearwater quickly outshined all of its competitors.

### The Solution

Vancouver Clinic initially engaged Clearwater in 2015 to conduct a HIPAA risk analysis and review all its existing HIPAA policies and procedures.

Clearwater mapped policies and procedures to the specific standards and implementation specifications of the HIPAA Breach and Notification Rules, documented them, and helped remediate where needed.

Clearwater then took a holistic approach to enterprise-wide risk management, something Vancouver Clinic did not have previously. Vancouver Clinic now uses Clearwater's IRM|Analysis software to maintain a database for ongoing risk analysis and management.

“Keeping an enterprise-wide risk analysis internally takes tremendous effort through custom spreadsheets. Clearwater's methodology, expertise, and IRM|Analysis software solves that challenge,” Bray said.

Clearwater helps Vancouver Clinic evaluate which assets should be fully re-assessed, which ones need to be reviewed and updated for new risks or new controls, and which ones have not been affected by changes.





## About Vancouver Clinic

Vancouver Clinic (VC), based in Vancouver, Washington, has more than 400 physicians and other providers caring for patients in 11 locations and six urgent care centers for afterhours services.

## 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

Today, VC has successfully built and continuously matures its HIPAA Privacy, Security, and Breach program. With Clearwater's support, Vancouver Clinic went from a handful of combined HIPAA policies and procedures to a modular approach, separating previously intermingled policies and procedures into unique documents where it makes sense. Clearwater's solution made processes easier to understand and follow, improved compliance and created efficiency.

"We have complete privacy, security, and breach policies now established and attested to every year," Bray said. "We have a bona fide annual HIPAA risk analysis that meets the Guidance of the Office for Civil Rights. There's no 'periodic' anymore; it's every year at minimum, and we also have the capability to update the risk analysis at any time. We have the capability to give a HIPAA compliance posture assessment at any given time, using Clearwater's software. In addition to performing the risk analysis, we have Clearwater supporting us in the event we ever have a major HIPAA incident or event or filing or anything."

Clearwater also worked with the Vancouver Clinic team to communicate risks upward to the board and leadership levels, while tying it back into areas they're most interested in—operational resilience and business success. Clearwater's opinion as a trusted third-party expert was useful in helping Bray explain why the company should make investments and commitments to building its HIPAA Privacy, Security, and Breach program.

## What Vancouver Clinic Says

*"We were able to work with Clearwater in a way that allowed knowledge transfer and advancement of skill sets to our team. They kept up with our drive to meet business objectives while expanding our visibility into information risk across the enterprise."*

**Michael Bray**  
CISO

## 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.