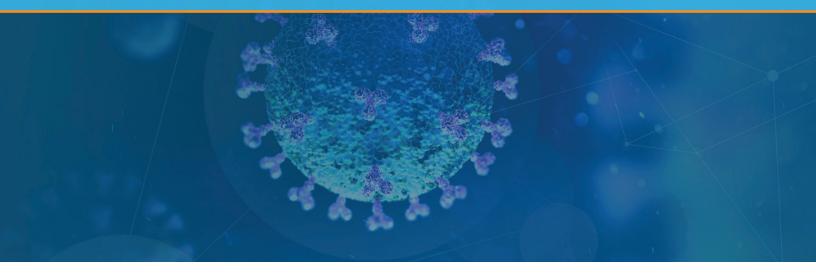
COVID-19 After Action Assessment



While the COVID-19 crisis is far from over, as the nation continues the process of re-opening, now is an appropriate time for healthcare providers' Information Technology and Security teams to assess the actions their organizations have taken to date. A COVID-19 After Action Assessment will not only inform your thinking about what needs to be done going forward, it also helps meet the requirements of the CMS Emergency Preparedness Rule and the HIPAA Security Rule.

The COVID-19 After Action
Assessment is an efficient, costeffective way to improve and
update your Business Continuity
Plan, satisfy compliance
requirements, and be better
prepared for the next incident.

CMS Emergency Preparedness Rule

Facilities are expected to meet all Training and Testing Requirements:

 Participation in a full-scale exercise that is communitybased or when a community-based exercise is not accessible, an individual, facility-based exercise.

Conduct an additional exercise that may include, but is not limited to the following:

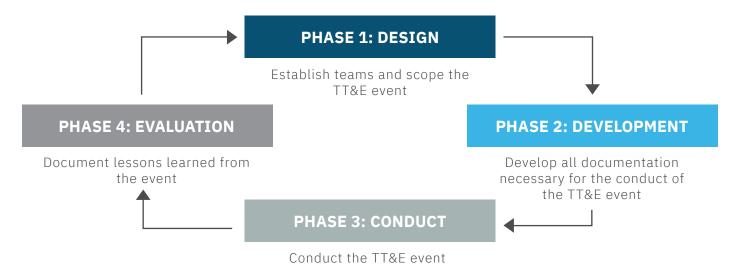
 A tabletop exercise that includes a group discussion led by a facilitator, using a narrated, clinically-relevant emergency scenario, and a set of problem statements, directed messages, or prepared questions designed to challenge an emergency plan.

HIPAA Security Rule

§ 164.308 Administrative safeguards (7)(ii)(D): Implement procedures for periodic testing and revision of contingency plans.



Test, Training and Exercise (TT&E) Methodology



A Critical Component of Business Continuity Planning

Clearwater has developed a proven methodology for evaluating responses to the COVID-19 pandemic and identifying gaps with existing Business Continuity Plans (BCP). Areas of focus include:

- Processes or responses that may have affected the confidentiality, integrity, and/or availability of data and the ability to deliver critical healthcare services
- Alterations to processes that affected how staff members access and transmit data
- Processes to manage third-party risk

Clearwater's experts will lead you through a facilitated session that includes key stakeholders responsible for determining and executing appropriate responses to the COVID-19 pandemic. The goals of the session are to:

- Document actions taken during the course of the COVID-19 timeline;
- Determine if these actions were in accordance with the organizational BCP;
- Identify unexpected and unplanned events that either caused the organization to deviate from or were not included in the BCP; and,
- Deliver a report that summarizes the effectiveness of the BCP and action items, if any, that should be considered to improve the organizational response to a pandemic event.



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