

Commure

376 Brannan Street  
San Francisco, CA 94107

March 13, 2020

## Introduction

Between the days of October 14, 2019 and January 31, 2020, one consultant from NCC Group expended a little over ten (10) person-days of effort on a HIPAA compliance assessment of Commure's environment. The assessment was concentrated around Commure's Listrunner V1.

The purpose of this assessment was to identify privacy and security related issues that could adversely affect the confidentiality, integrity or availability of Commure's Listrunner V1 environment. This assessment was performed by NCC Group under the guidelines provided in the statement of work for the engagement. This letter provides a high-level overview of the testing performed and the result of that testing.

## Detailed Letter of Attestation of HIPAA Compliance Overview

NCC Group is a global information assurance firm that, in the US, specializes in compliance assessments, including the HIPAA security, breach notification, and privacy rules. Security conscious companies use NCC Group's Detailed Letter of Attestation of HIPAA Compliance to verify product attributes in view of current security best practices, standard security functionality, and product protection. More information about the Group's processes and products can be found at <https://nccgroup.com/us>.

It is important to note that this document represents a point-in-time evaluation of security posture. Security threats and attacker techniques evolve rapidly and the results of this assessment are not intended to represent an endorsement of the adequacy of current security measures against future threats. This Detailed Letter of Attestation of HIPAA Compliance necessarily contains information in summary form and is therefore intended for general guidance only; it is not intended as a substitute for detailed research or the exercise of professional judgment. The information presented here should not be construed as professional advice or service.

## Validation Methods

Validation was performed using an assessment methodology, with stakeholder interviews, observations, and documentation review. The security assessment of Commure's environment was performed remotely off-site for interviews, observations, validation, and evidence analysis. NCC Group's consultant used a combination of techniques throughout the assessment. Commure's Listrunner V1 was reviewed against the following methodology:

- **Phase 1 - Project Initiation:** Once the Statement of Work (SOW) was signed, NCC Group worked with Commure to schedule a kick-off call and perform introductions. During the kick-off call, NCC Group presented the assessment process, discussed points of contact, communication methods, and the project timeline. In addition, Commure provided documentation for review prior to the interviews that were mapped to a document request list previously provided.
- **Phase 2 - Fieldwork & Testing:** Moving into phase 2, NCC Group worked with Commure to solidify logistics, develop an interview and observation schedule, begin reviewing policies and procedures along with requested evidence. In addition, offsite validation occurred, including interviews, observations, analysis, and walk-through of the Commure Listrunner V1 environment. NCC Group maintained regular communication to keep all stakeholders informed and to communicate as soon as possible on potential gaps.
- **Phase 3 - Reporting & QA:** As Fieldwork and Testing were wrapping up, NCC Group began drafting an Addendum to the original compliance report. The NCC Group QA team performed an internal review of the draft deliverables prior to sending these documents to Commure for review.
- **Phase 4 - Client Review & Submission:** Upon completion of the NCC Group QA process, all deliverables were provided to Commure for review and approval. This approach enabled the NCC Group to ensure the final assessment report was accurate

and did not misstate any facts relevant to Commure's in-scope activities. Upon receipt of Commure's edits, the NCC Group incorporated these changes into the deliverables as necessary. At this point, the NCC Group marked the deliverables as final and provided these documents to Commure.

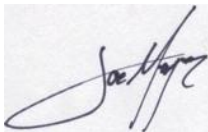
- **Phase 5 - Remediation Support:** Phase 5 is an optional step in the assessment process for future discussion and was not included in the current Commure SOW. Security is a moving target due to constant changes in an organization's environment. As such, issues may be identified during an assessment. NCC Group will work with Commure to provide remediation support as required by Commure. Note: Remediation Support will require a defined scope, timeline, and change order.
- **Phase 6 – HITRUST Facilitated Self-Assessment:** Phase 6 is an optional step in the assessment process for future discussion and was not included in the current Commure SOW. Commure showed interest in increasing their level of assurance through the participation in the HITRUST CSF Assurance Program. Part of the current assessment involved providing recommendations on Commure's HITRUST Readiness. NCC Group will work with Commure to provide HITRUST support as required by Commure. Note: Commure contracted with NCC Group to perform a HITRUST Facilitated Self-Assessment and successfully completed this phase.
- **Phase 7 – HITRUST Validated Assessment:** Phase 7 is a required step in the assessment process for future discussion and was not included in the current Commure SOW. As part of the HITRUST CSF Assurance Program, a third-party independent approved assessment firm must perform the HITRUST Validated Assessment on Commure. NCC Group will work with Commure to provide HITRUST support as required by Commure. Note: Commure contracted NCC group and has submitted a validated assessment to HITRUST and is currently waiting on the HITRUST QA for comments and a draft report.

## Summary of Findings

Commure effectively supported the assessment process, providing stakeholder's for interviews and observations along with evidence for detailed analysis. During the assessment, NCC Group determined that Commure has a stronger information security posture as compared to other organizations of similar size and complexity. NCC Group determined that Commure's current relationships with external entities positions them as a Business Associate. As such, Commure falls within scope of HIPAA enforcement. As a result, Commure must abide by the HIPAA Security Rules and any applicable Privacy Rules. Based on validation activities performed during this assessment, NCC Group has determined that Commure's Listrunner V1 is **MATERIALLY COMPLIANT** with the HIPAA Security Requirements.

Upon completion of the assessment, all opportunities for improvement were reported to Commure along with recommendations.

**Joe Meyer**



Director of Healthcare and Privacy Services

Risk Management & Governance North America, [NCC Group](#)

+1 561 614 6335

Copyright 2019 – NCC Group.

Prepared by NCC Group Security Services, Inc. for Commure. Portions of this document and the templates used in its production are the property of NCC Group and cannot be copied (in full or in part) without NCC Group's permission. While precautions have been taken in the preparation of this document, NCC Group the publisher, and the author(s) assume no responsibility for errors, omissions, or for damages resulting from the use of the information contained herein. Use of NCC Group's services does not guarantee the security of a system, or that computer intrusions will not occur.