

REAN Cloud

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Introduction

Between the days of April 14, 2017 and May 18, 2017, NCC Group completed a HIPAA gap assessment of the AHA Precision Medicine Platform environment, developed and managed by REAN Cloud. The assessment was concentrated around the American Heart Association (AHA) Institute services workflow for precision cardiovascular medicine research.

The purpose of this assessment was to identify privacy and security related issues that could impact the confidentiality, integrity or availability of the AHA Precision Medicine Platform environment, developed and managed by REAN Cloud. 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 results of that testing.

Detailed Letter of Engagement Overview

NCC Group is a global information assurance firm that, in the US, specializes in compliance assessments, including the HIPAA privacy, security and breach notification rules. Security conscious companies use NCC Group's Detailed Letters of Engagement 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.trust/us>.

It is important to note that this document represents the results of a point-in-time evaluation. 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 Engagement 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.

Testing Methods

Testing was performed using an assessment methodology, with stakeholder interviews, observations, documentation review, technical testing and site visits. The security assessment of REAN Cloud was performed both on-site (interviews and observations) and off-site (technical testing and evidence analysis).

Summary of Findings

The American Heart Association and REAN Cloud requested a proactive HIPAA assessment to evaluate the technical and administrative controls of the Precision Medicine Platform with the intent of demonstrating the HIPAA-readiness of the platform. REAN Cloud effectively supported the assessment process, providing stakeholders for interviews and observations and evidence for detailed analysis. NCC Group determined that REAN Cloud's relationships with certain key external entities does not currently position them as a Covered Entity or Business Associate. However, based on NCC Group's assessment, the Precision Medicine Platform environment did not have any major risks related to HIPAA. NCC Group's assessment identified opportunities to further enhance their security posture should the Precision Medicine Platform fall under the scope of HIPAA in the future. Based upon REAN's current plan of actions and milestones and completed technical architecture, NCC Group concluded that the Precision Medicine Platform environment is "HIPAA ready".

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