



Indiana Eligibility Modernization Project
for the
Indiana Family & Social Services
Administration



HIPAA Breach Amended Final Report

July 31, 2013

Table of Contents

1.0 Overview	2
2.0 Final Report	3
3.0 Corrective Action	4
3.1 About RCR on the IEMP Project	4
3.2 Corrective Action	4
3.2.1 <i>Formal Design Review and Formal Code Review</i>	4
3.2.2 <i>Production Mirror of Test Environments</i>	4
3.2.3 <i>Increase Performance Testing</i>	5

1.0 Overview

In agreement with the Governor of Indiana and FSSA Secretary to get exact numbers the team set a plan in place to get to the exact numbers. This was always the ultimate goal of RCR Tech but with the community need for a resolution we accelerated the process. The challenge was to reproduce an issue that can't be exactly duplicated because items like bandwidth and system load are variable to conditions on a particular day. The code error plus these variables is what ultimately creates a comingled document.

Beginning 7/17/2013 the team has regenerated the 379,861 pieces of correspondence mailed between 4/6/2013 and 5/21/2013. To get the data to be summarized and create a matching process we enlisted aid from Adobe, Indiana Office of Technology, the German PDF file comparison tool (INET PDFC from INET Software) and the expertise of many of RCR Technology's employees. Using the tools and support, the RCR team put the plan into action to regenerate and compare every potential document from the affected time period. We did the compare in the day/week order of the generated correspondence and reported to the State every other day. The largest factor in this process was the time it took to regenerate documents. The Adobe PDF conversion process takes 6 – 7 seconds per document. With the number of documents we had to review we worked with IOT to create multiple environments. This enhanced our processing speed significantly.

The comparison process consisted of feeding each regenerated PDF file into the INET compare tool against the extracted PDF from Production with the same name. The compare tool was scripted to output results including total number of errors, errors per page and page count. The comingled documents were found by using analytics and exercising a tolerance of errors for minor differences based on the generation process. In the days leading up the final run the team worked to remove as many differences in the environments to reduce the noise in the comparison process. Three criteria were applied to find the comingled documents:

1. Total errors greater than 80 per document.
2. Any document with more than 30 errors per page.
3. Any document with the combination of page 9, 10 and 11 with greater than 8, 4 and 7 errors per page respectively.

The RCR Technology team has taken the issue of accurate reporting very seriously and have verified the results below. We also have reported the actual SSN breaches as required. As a token of support we also will offer these specific impacted individuals one year of identity protection if they desire it.

We thank the Governor and the divisions of FSSA and IOT for their support as we worked through this issue. RCR has a long history of success with the State of Indiana and we will continue to honor that trust by providing the highest level of service that is expected. We are happy that the impacted potential population is significantly less than originally reported but understand some clients were still impacted. Our corrective action plan will be implemented to insure this type of incident be prevented in the future.

2.0 Final Report

HIPAA Breach Type	Count of Co-Mingled Correspondences	Count of Individuals
Total Potentially Impacted		187,533
Full SSN	47	16
Partial SSN or more than (name, case and/or address)	57	48
TOTAL	104	64

Non-reportable Disclosures ¹	Count of Co-Mingled Correspondences	Count of Individuals
Name, Case Number, and/or Address	134	66
No disclosure (missing pages or blank templates/pages)	15	14
TOTAL		80

¹ No written notice to clients is required in these instances because the information is not protected by law or regulation. These clients were not included in notifications sent in early July.

3.0 Corrective Action

3.1 About RCR on the IEMP Project

The RCR team maintains, enhances and manages the multi faceted case management system for DFR including: FACTS/Cúram, Doc Center, Interfaces, IVR and Reporting. In the last three years the team has created, managed and deployed 46 releases to production with over 500 changes to the system including the following major enhancements:

- Completed a full upgrade of Cúram from v4.5 to v5.2, including database upgrade and platform migration to Windows. (March 2011)
- Completed the rollout of FACTS to the remaining half of the state including the Lake, St. Joseph, Wayne, Tippecanoe, and Marion regions. (2011 - 2012)
- Introduced and enhanced use of real time interfaces including: Addresses, Assistance Groups Client Data, and Authorized Representatives. (2011 - 2012)
- Implemented the Appeals module to modernize the Office of Hearings and Appeals, streamline their work process and enhance ability to meet deadlines. (October 2012)

3.2 Corrective Action

The Application Service team provides rigid adherence to the established SDLC processes for the project. Due the occurrence of this situation the team has evaluated the situation and determined the following to be items that will prevent this situation in the future.

3.2.1 Formal Design Review and Formal Code Review

Up to the point of the issue defined in this document, the team implemented the formal SDLC process as established on the project. As part of that, the team also executed many informal reviews of major architectural changes at checkpoints along the life cycle, a process which has worked effectively in the past with the many major enhancements released to production. With the advent of this situation the team determined it necessary to enhance the SDLC process to create a Formal Design Review and Formal Code Review for architectural changes. Measures are currently underway to formalize this process and will be rigidly followed with the major release in October 2013 for the PPACA release incorporating the addition of a Cúram v6 environment. This change is in addition to our current peer review process and the formal System Integration Testing (SIT) and User Acceptance Testing (UAT) processes already part of the established SDLC.

3.2.2 Production Mirror of Test Environments

Create SIT and UAT environments that are more of a mirror of the production environment to allow for more natural occurrence of production issues. The RCR team will work together with DFR and IOT to establish the appropriate level of replication of the production environment in the test environments based on risk and cost.

3.2.3 Increase Performance Testing

In cases of architectural changes or major enhancements the team will increase the use of Performance testing. Though this will increase the length of testing and the resources necessary to execute the testing cycle, the benefits is confidence in the solution moving forward. Additional use of the Performance Testing tool is planned for the major release in October 2013 for the PPACA changes as increased volume of application is expected. Detailed planning of approach for performance testing of the release is currently underway.