



# Health Care

## **Health Affairs Committee Compliance Update**

**November 5, 2018**

## CORPORATE INTEGRITY AGREEMENT UPDATE

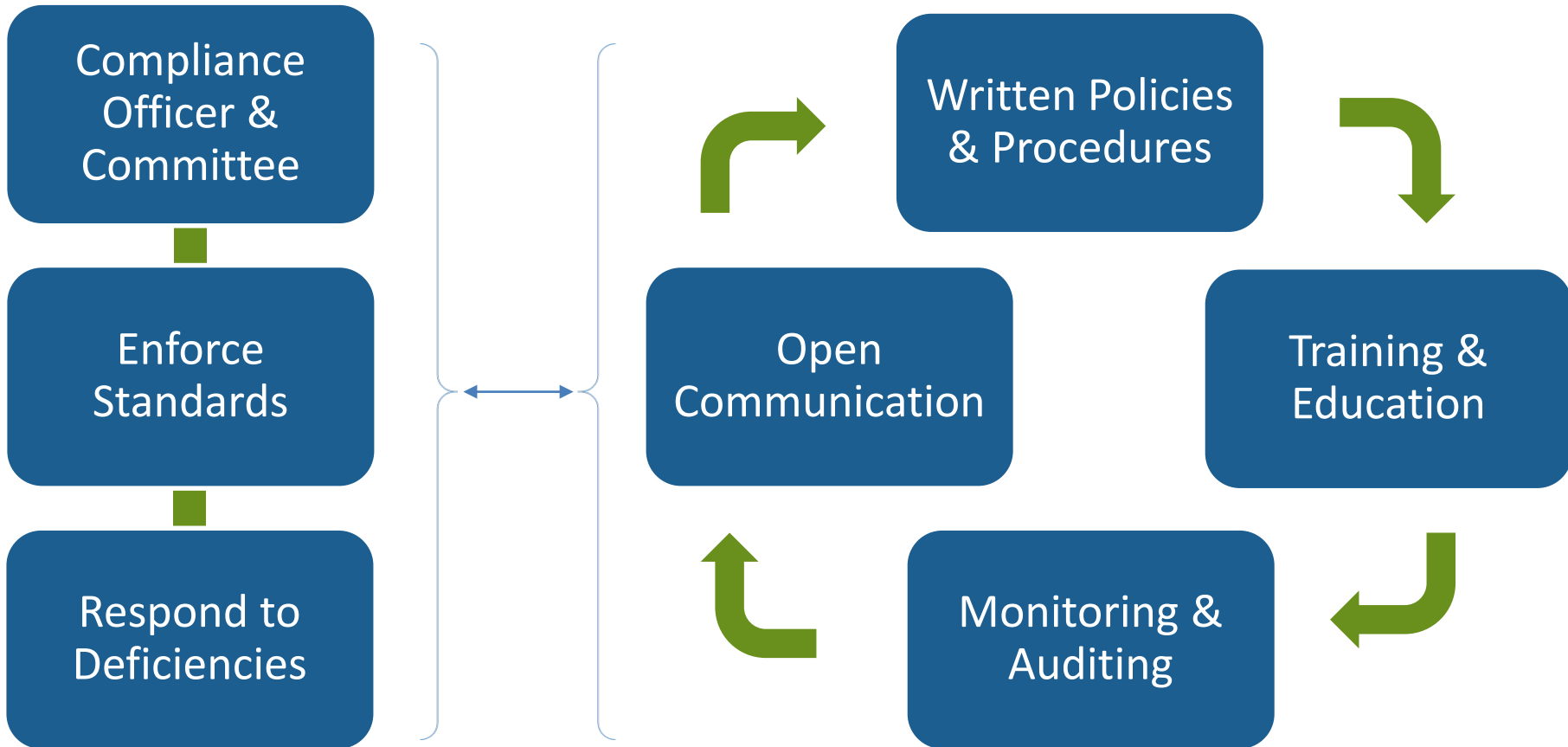
- No comments received on RP2 Annual Report
- Repaid extrapolation from Claims Review
  - RP3 Claims Review facility list and selection will occur in Spring 2019

## Elements of the MU Health Compliance Program

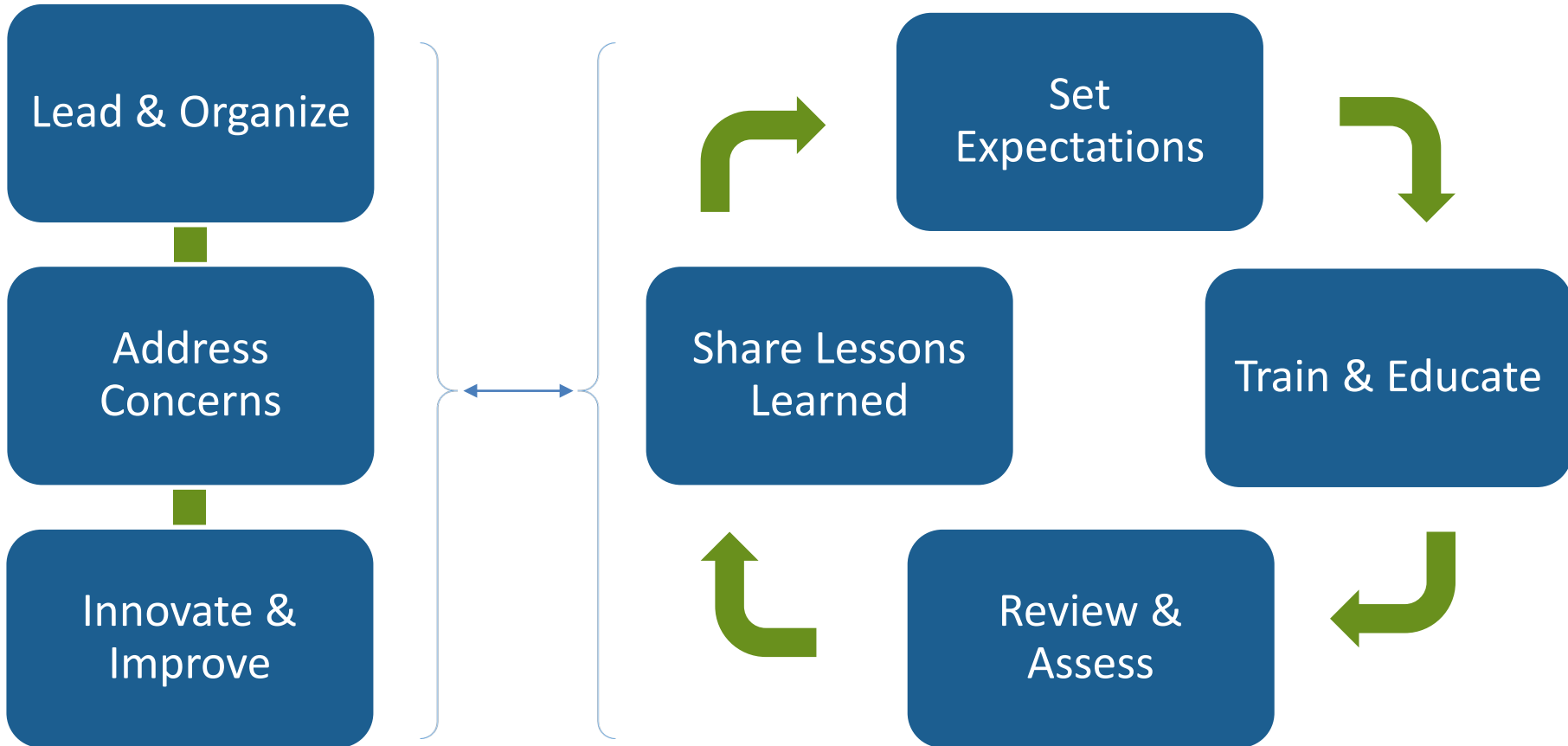
Organized in accordance with the seven elements outlined by the DHHS OIG for effective compliance programs

1. Designate a compliance officer and compliance committees
2. Develop written compliance plans, policies, and standards of conduct
3. Monitor and audit compliance risk areas
4. Develop open lines of communication
5. Implement education and training
6. Enforce disciplinary standards
7. Respond to detected deficiencies

# Visualizing Effective Compliance

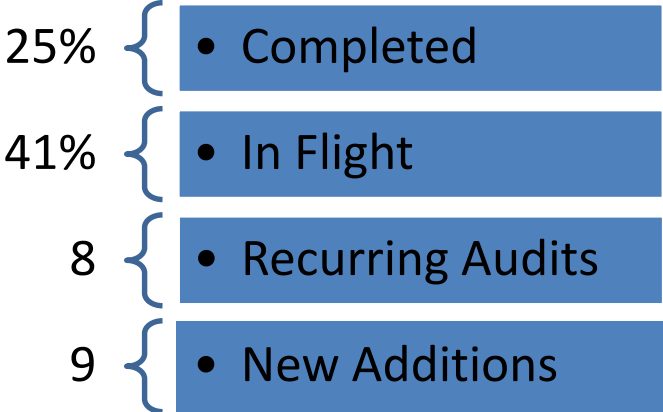


# Operationalizing Effective Compliance



# COMPLIANCE PROGRAM UPDATE

- Work Plan Status
  - ~5 “ad hoc” requests/month
    - not included in work plan figures



- Current Efforts
  - Supporting Pharmacy 340B HRSA Audit
  - Analyzing Coding & Billing Quality Data from UP Accuracy Vendor
  - Regulatory Change Management
  - Revising all OCC publications
  - Policy Development Projects
    - Ex: Chaperones; Therapy Animals; Visitors

# INFORMATION SECURITY PROGRAM UPDATE

- Sean Rivera, MU Health Information Security Officer
- Information Security is:
  - Processes and methodologies designed and implemented to protect print, electronic, or any other form of confidential, private and sensitive information or data from unauthorized access, use, misuse, disclosure, destruction, modification, or disruption
  - In short, preserve the **Confidentiality, Integrity, and Availability** of data

# INFORMATION SECURITY PROGRAM UPDATE

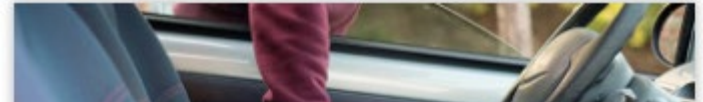


NEWS

## Third-party vendor error exposes data of 19K patients for 2 months

by [Jessica Davis](#) | August 02, 2018

Orlando Orthopaedic's transcriptionist vendor misconfigured access to a database during a software upgrade. The health center waited



## Pharmacy records

19, 2018

records were hacked including financial



NEWS

## Nearly 280,000 Medicaid patient records breached in Oklahoma hack

by [Jessica Davis](#) | January 15, 2018

A hacker gained access to an Oklahoma State Health Sciences network and accessed folders containing Medicaid billing data.

was stolen from a car and serves as a reminder to encrypt all data.



# Why is Healthcare Data So Valuable?

Financial data has a finite lifespan because it becomes worthless the second the customer detects the fraud and cancels the card or account. Most forums for such data have a high enough surplus of stolen payment cards that they have fire sales.

But information contained in health care records has a much longer shelf life and is rich enough for identity theft. Social Security numbers can't easily be cancelled, and medical and prescription records are permanent. There's also a large market for health insurance fraud and abuse, which may be more lucrative than simply selling the records outright in forums.

# INFORMATION SECURITY PROGRAM UPDATE

## Program Accomplishments to date:

- Revised Information Security Program Policy
- Established Information Security Advisory Council
- Adopted Critical Security Controls
- High-Level risk assessment
- Increased cyber security posture with tools in place
- Started education and awareness efforts
- Daily Activities include:
  - policy and procedure ownership
  - procurement reviews
  - incident tracking

# PRIVACY PROGRAM UPDATE

- Office of Corporate Compliance Staffing Updates
  - Retired: Tina Adams-Salter, System Privacy Officer
    - System Privacy Officer provides oversight and direction of the MU Health privacy program; HIPAA rules compliance and enforcement; Privacy education and training; Assess privacy risks and coordinate organization-wide protections for our patients' protected health information
    - Recruitment in process