Preparing for the OCR:
Proactively Assess and Lessen the Burden in the Event of an Audit
Agenda

- OCR Audit Protocol update
- Phase 2 HIPAA audits
- Benefits of preparing
- How did we prepare?

OCR Audit Protocol Update

- Website: [http://www.hhs.gov/hipaa/for-professionals/compliance-enforcement/audit/protocol/](http://www.hhs.gov/hipaa/for-professionals/compliance-enforcement/audit/protocol/)
Phase 2 HIPAA Audits

• In 2016, the OCR began building their information population of covered entities (“CEs”) by requiring CEs to verify contact information, as well as complete a pre-screening questionnaire.

• 167 covered entities were selected for topic-focused audits in mid-2016. Audit of business associates to commence anytime.

• Comprehensive on-site audits scheduled 2017

• Audit selectees have 10 business days to respond to initial data requests.

Benefits of Preparing

• Facilities could still be selected for audits in 2017 and going forward as part of OCR’s continuous audit monitoring program.

• Facilities proactively mitigate risk and remediate control gaps.

• Evidence collected early can be set aside to save in the event of an audit, which cutes down on the burden of pulling together evidence in a 10-day window.

• Re-educational value
How Did We Prepare?

- Leveraged the latest OCR Protocol for the Privacy and Breach Notification Rules to create a Questionnaire tool
  - Security Rule was handled by Internal Audit and Corporate Security

- Based on responses, a Corrective Action Plan would automatically populate “Not Compliant” responses.

- Facilities worked with Corporate Compliance to address any “Not Compliant” areas
Corrective Action Plan

CHPS/ HPAA Privacy Corrective Action Plan

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<th>Findings/Remediation</th>
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1. The Corrective Action Plan
2. The Plan identifies and establishes a timeline for the required action.
3. Items on the correct action plan must be followed and addressed.
4. Ensure the plan document has been reviewed.

Questions?