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/

<table>
<thead>
<tr>
<th>Audit Type</th>
<th>Section</th>
<th>Key Activity</th>
<th>Established Performance &amp; Data</th>
<th>Audit Impact</th>
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<tbody>
<tr>
<td>Phase 1</td>
<td>[Section 1]</td>
<td>[Key Activity 1]</td>
<td>[Established Performance &amp; Data 1]</td>
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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
Questions?