

## Healthcare Security Audit Experiences & Issues CMS & NIST HIPAA Security Rule Conference

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## **General Experiences**

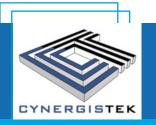
- Many remain non compliant after more than six years to prepare
- Policy/procedure/practice mismatches
- Lack of technologies to adequately effect compliance
- Immature risk management processes
- Programs largely still reactive in nature





- HIPAA Security Rule does not provide structure for developing security program
- Organizations lack IT Security experience
- Security initiatives are generally under funded
- Implementation is still a risk based proposition

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## Lessons Learned

- Organizations that adopt a framework fair much better in audits/assessments
- Organizations want/need a matrix approach to information security
- Organizational placement of security responsibilities remains an issue
- Requirement for better guidance with respect to implementation
- Audits/assessments need to focus on actionable remediation guidance





## Thank You

Contact Information: <u>Mac.mcmillan@cynergistek.com</u> O: (512) 402-8551 C: (703) 244-3944

