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

May 18, 2009
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
Issues

- 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
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
Wrap Up

Thank You

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