



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



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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