

CompliancePro[™]
A Gezeon Company
SOLUTIONS

CMIT Solutions[®]

CMIT Spring Webinar

May 19, 2022

Agenda

1 Introductions

2 Hot Topics

3 CPS / CMIT Offerings

4 CMIT Spotlight

5 Security Trends

6 Introduction to Genzeon

7 Q & A

8 Next Webinar

Introductions



Chris Vicario

*Training/Development
Manager - CMIT
Solutions*



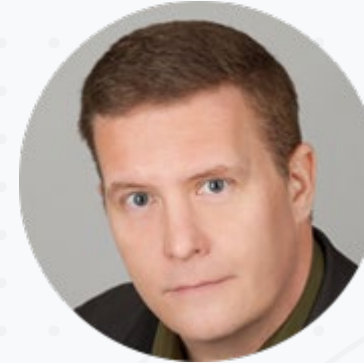
Kelly McLendon

*RHIA, CHPS
Chief Compliance Officer
and Co-founder,
CompliancePro Solutions*



Mike Pietig

*General Manager -
CompliancePro
Solutions*



Derek Walker

*VP, Product -
CompliancePro
Solutions*



Steve Goriah

*Security Advisor,
CompliancePro
Solutions*

Hot Topics

Security, Privacy, and Compliance



Cybersecurity Warnings for All US Companies

The White House has Issued Cybersecurity Warnings and Practices for US businesses

- June 02, 2021: '[What We Urge You To Do to Protect Against the Threat of Ransomware](#)'
- [5 best practices](#), part of a detailed discussion for US companies on how to protect against ransomware
- March 21, 2022: '[Fact Sheet Act Now to Protect Against Cyber Attacks](#)'
 - Contains about a **dozen good, easy to understand, high level cybersecurity controls** that US business can use for protection, aligns with publications like 405(d) but is for a wider scope of businesses

NEW SHERIFFS IN TOWN

OIG & FTC Get into Privacy with OCR and DOJ (and State AGs)



HHS.gov

OCR Enforcement & New Rules

- OCR is issuing many Patient Access Initiative violations (27+)
- Fines of \$28,000 to \$160,000 can be tough on a small provider organizations
- Don't be fooled by penalty size.
 - \$100,000 - \$160,000 penalties and settlements could be the result of failing to cooperate with investigators or other egregious factors
- HIPAA NPRM has been issued - **final rule expected in Fall 2022.**
We will update training and content shortly thereafter.



New and Increased Enforcement – 21st Century Cures Act

- Office of the Inspector General (OIG) is investigative body
- Co-mingle with OCR HIPAA enforcement increasingly as those rule synchronize
- Expect heavy enforcement as IB penalties and fines for **API Certified EHR vendors** is up to **\$1,000,000 per violation** – *and you know how they can stack up violations!*
- **Appropriate disincentives - Fines for Providers and Payers TBD** based on a new Final Rule yet to be published, but widely expected
- OIG does not have to investigate all complaints of information blocking (through portal primarily) and will concentrate on those that most impact patient access



CMIT Success and Packages



CMIT Spotlight

- Physician practice in Idaho
- Prospect had a breach and OCR investigation
- Had a previous MSP but had let them go to save on cost prior to breach
- Attorneys advised they perform a Security Risk Assessment
 - Needed to be conducted in a limited time frame
- Resulted in a lengthy remediation list for CMIT
- Major issues have been resolved, still resolving more minor issues
- Final results - no sanctions/fines from OCR!

“ The client was very impressed with Kelly and that he really understood HIPAA compliance.

It was extremely valuable that CPS could work directly with the client and with us. ”

- Scott Freund

CMIT Packages Available to Owners and Clients

License and Services

- Training & Education
- Policy Templates
- Reference & Customer Libraries
- Advisory Services
- Assessment Module & Template
 - 405(d) Enhancements

Additional Opportunities

- Direct Client Contracting
- Privacy Assessments

Facility: Memorial Hos

Site Info (A) Pre-SRA Docu (E) Business Associates-Sec

This tab lists all the risks a action here as well as add






Question	Risk Des	Risk Level	Status	Assigned	Target Date	Date Closed	Attachment	Notes	Email
<input type="checkbox"/> D1	Has the organization implemented documented policy/procedure to allow access to ePHI only to authorized users, based on role (including application developers) and data classification?	High	Active						Send Edit Complete Cancel Delete
<input type="checkbox"/> D2	Has the organization implemented a documented policy/procedure for unique user ID that has resulted in all users having a unique logon ID?	High	Active						Send Edit Complete Cancel Delete

Case Information	Question	Risk Level	Action Item	Status	Assigned	Target Date	Date Closed	Attachment	Notes	Email
<input type="checkbox"/> D1		High	101s - Policy/Procedure - Access Authorization and Acceptable Use	Active	Abraham Lincoln	08/14/2020				Send Edit Complete Cancel Delete
<input type="checkbox"/> D2		High	114s - Policy/Procedure - User Authentication and	Active	Abraham	08/14/2020				Send Edit Complete Cancel Delete

Security

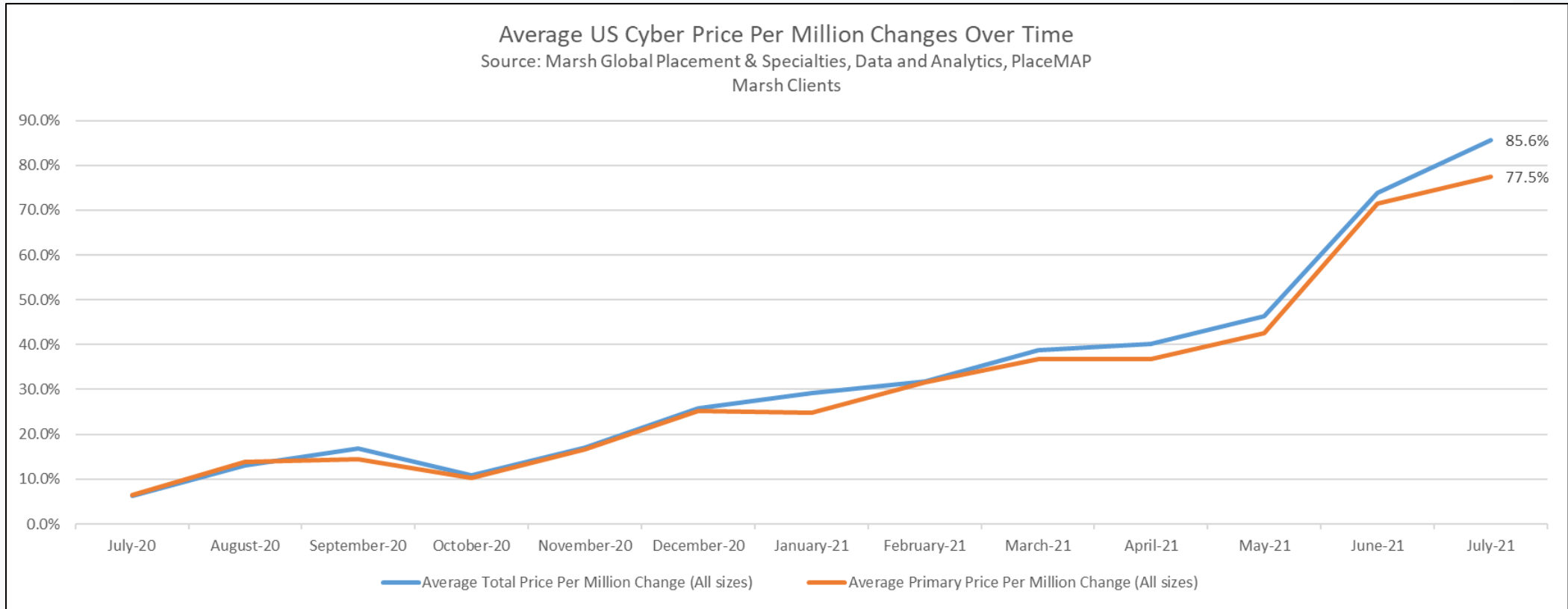


Cyber Insurance Market Snapshot

Claims	Rates	Capacity & Attachment	Underwriting	Coverage
 <p>Overall claims frequency and severity remains high driven by ransomware. Mild improvement in some categories but overall, loss ratios continue to deteriorate.</p>	 <p>Loss environment has resulted in accelerating pricing pressure <u>even on loss free accounts with good controls</u>. Expect rate increases to continue rising through the rest of the year.</p>	 <p>Claims activity and future uncertainty have resulted in insurers aggressively managing global capacity and increasing SIRs. Excess pricing increasing at a faster rate than primary, compounding increases.</p>	 <p>Full application & responses to ransomware <u>Q's</u> are required; carriers using third parties to externally scan environments. Underwriters will inquire about recent systemic/supply chain events & related exposures</p>	 <p>Many carriers scaling back ransomware-related coverages (<u>sublimits or coinsurance</u>), or not offering coverage if poor controls. More scrutiny on contingent business interruption due to systemic risk concerns.</p>

Marsh 2021

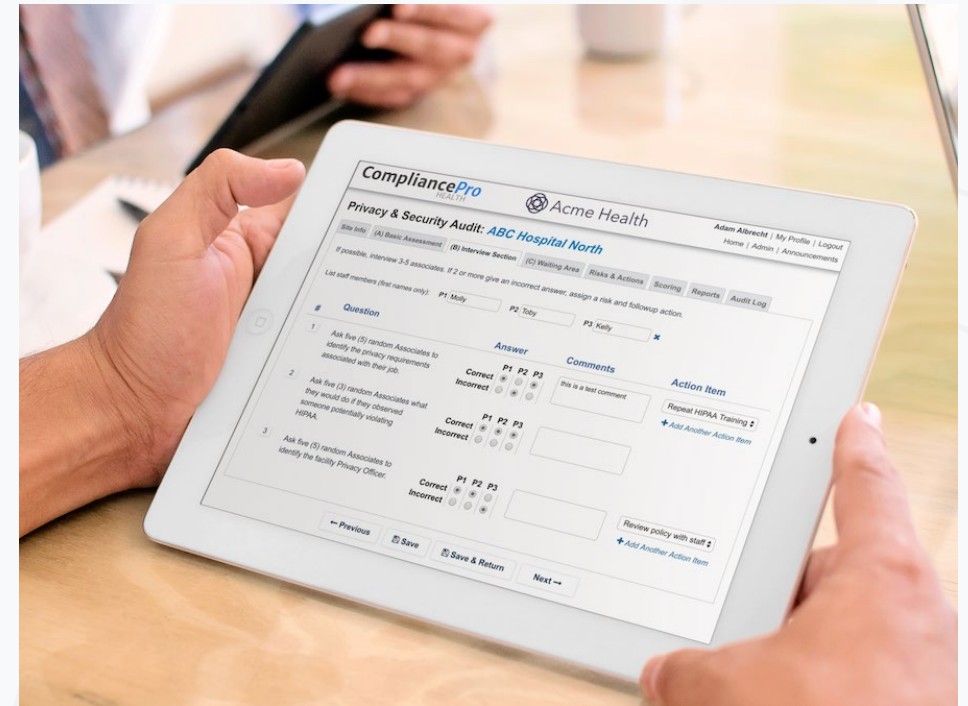
Average Cyber Rate Change



July 2021	1 st Quartile	Median	Average	3 rd Quartile
Total price per mil	42.5%	67.7%	85.6%	114.6%
Primary price per mil	31.9%	56.8%	77.5%	93.1%

New Security Programs for CMIT

- [CMMC Program](#)
 - Important for clients contracting for Department of Defense
 - Assessment, remediation and education
 - NIST 800-171 & CMMC
- Virtual CISO
- Security Risk Assessment
- Incident Response
- Third Party Risk Management (TPRM)



Genzeon Intro



CompliancePro Solutions and Genzeon

- [CompliancePro Solutions acquired](#) in November, 2021
- Genzeon is a global IT services, solutions, and consulting organization serving healthcare, retail, and technology companies.
- Genzeon's expertise expands the consultative range of CompliancePro Solutions

Cloud Enablement
Intelligent Automation
Virtual CISO/CPO
Digital Workers

Security and Privacy
Application Modernization
Strategic Resourcing
Global Delivery Models



Questions & Answers

A decorative graphic on the right side of the slide. It features a light grey dotted grid background. Overlaid on this grid are several blue curved lines. A prominent, thick blue arc curves from the top right towards the bottom right. Below this, two thinner blue arcs are visible. At the bottom left of these arcs is a solid grey circle. The overall design is clean and modern, using a blue and grey color palette.

Registration Process

CompliancePro Health™ Library Order form for CMIT Franchises
CompliancePro Solutions

Effective Date: _____

CMIT Franchise Name: _____ (“Customer”)

Address: _____ (street)
_____ (city, state, zip)

Contact Name: _____

Contact Phone#: _____

Contact Email: _____

	Full Name	Suggested Login ID	(one word, 8 chars or less)
User #1:	_____	_____	
User #2:	_____	_____	(let us know if you
User #3:	_____	_____	need more login IDs)

Terms: This license provides Customer with unlimited access to the CompliancePro Health™ Library for their internal use and for their healthcare clients for a period of one year. It also includes up to 5 HIPAA training licenses for training of internal CMIT staff for one calendar month.

For new customers, CompliancePro Solutions™ will provide a one-hour web-based “onboarding session” to train Customer on how to use the CompliancePro Health™ Library and familiarize them with its contents and also provide customer support throughout the subscription period. Payment terms: net 30.

Customer Signature: _____

Date: _____

CompliancePro will contact you when your login IDs are activated and to schedule the onboarding session. Please contact Kelly McLendon, kmclendon@complianceprosolutions.com, 321-268-0320, if you have questions or if you would like to schedule your HIPAA training.

CMIT – Summer Webinar Details



Thursday, July 21, 2022

2 – 3 pm ET

Register Now:

<https://complianceprosolutions.com/cmit-summer-webinar-2022/>