

3.04

Comparisons of Risk Assessments from Across the Country

Presenter:

Frank Ruelas, MBA

Director, Corporate Compliance
Gila River Health Care Corporation
Sacaton, Arizona

To those who chose not to take action....

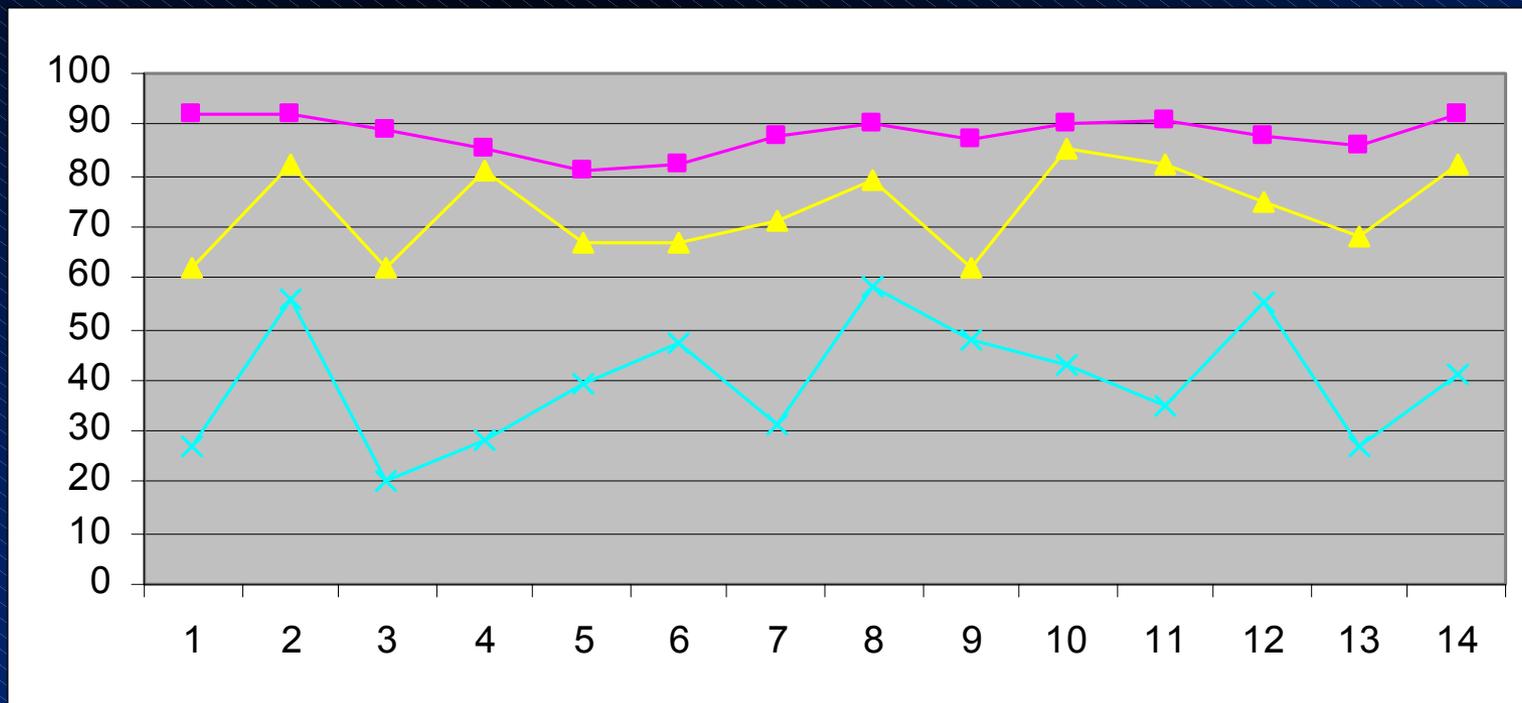
“There are risks and costs to a program of action. But they are far less than the long-range risks and costs of comfortable inaction.”

- John F. Kennedy (1917 – 1963)

General Observation #1

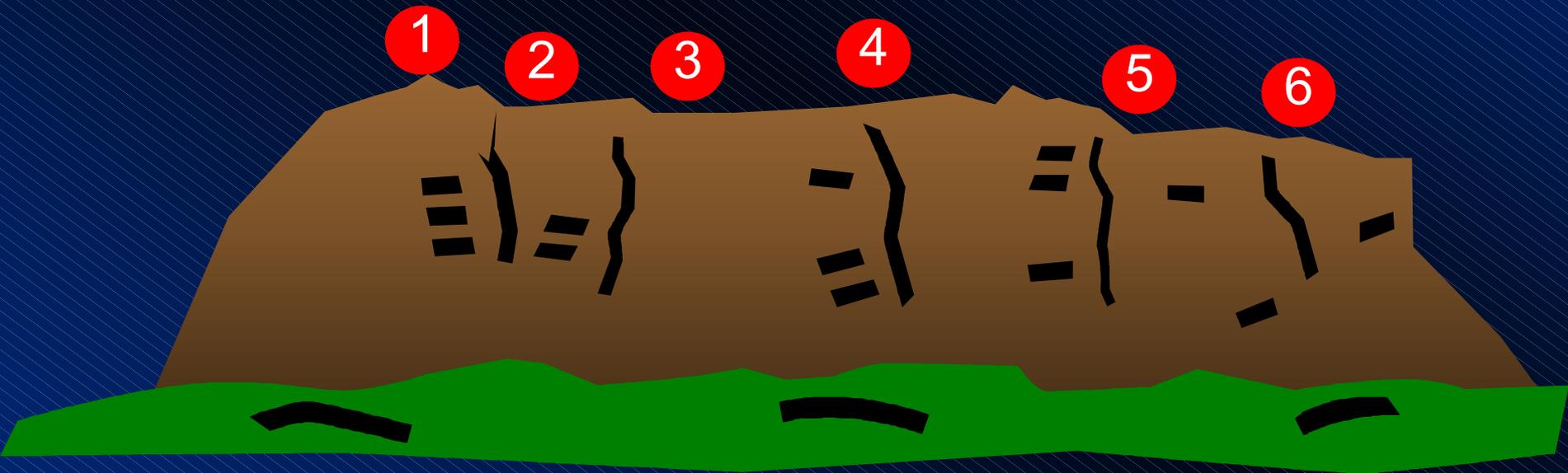


Risk levels tended to be relatively consistent by organization.



General Observation #2:

Risk mitigation levels the playing field.



General Observation #3:

Three level rating system most popular.

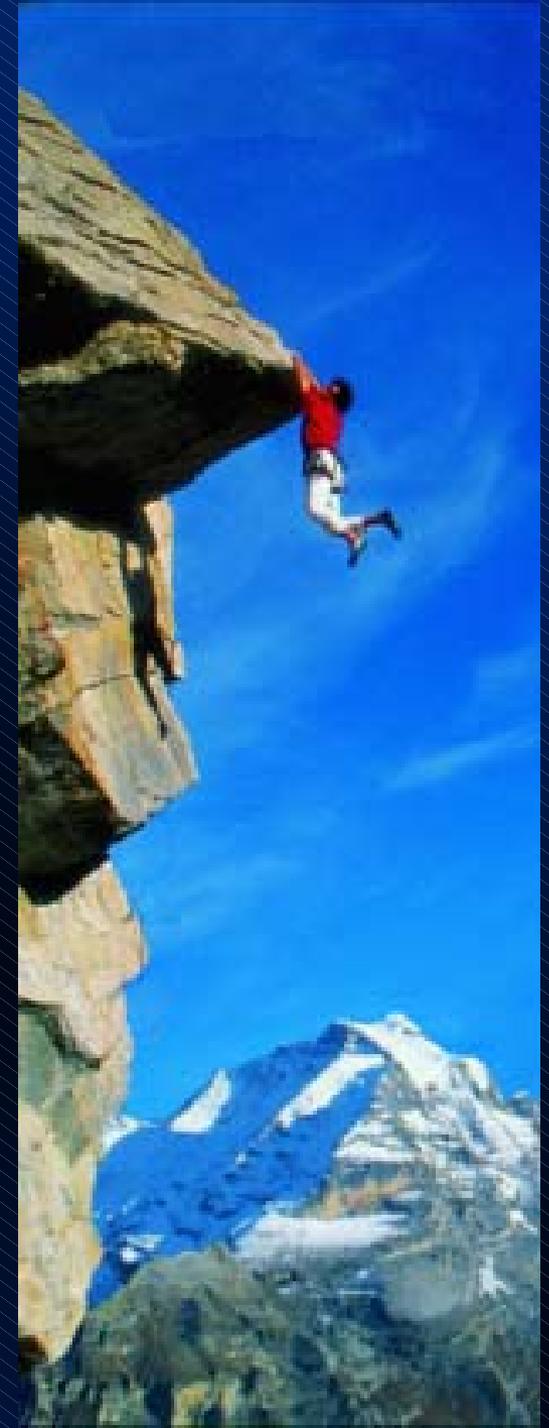


Risk assessment feedback considerations

- Anonymity
- Assumption of respondent knowledge
- Non-scientific or statistically valid
- Questions presented “as is” no other details

List of identified risks:

- Over 120 were identified
- Subsets were sent out
- Common responses were grouped
- Ranking system was used
- Final 14 were used in the survey



The 14 finalists are:

1. Identifying user activity inconsistent with privileges
2. Emailing of ePHI
3. Unauthorized copying of ePHI on transportable media
4. Introduction of malicious software
5. Accessing ePHI by using another's password
6. Disruption of service due to power outage a
7. Takeover of an authorized session by another

The 14 finalists are:

8. Unauthorized viewing of ePHI on display devices
9. Theft of devices where ePHI may reside
10. Access of ePHI through remote access
11. Use of dial up or internet access by authorized users
12. Retrieval of ePHI from decommissioned media
13. Access to computer rooms or similar locations
14. Use of wireless devices to access ePHI

The wireless techno headache



58% of the respondents said “no” to wireless.

The remainder were looking at either a limited or phased in approach.

Summary:

- Decision ownership raised awareness
- Ongoing assessments due to techno adoption
- Trust can only take you so far
- Surveillance and response are key elements

Email: fruelas@grhc.org