

UW Healthcare Component Compliance Group

Date: 12-10-13

Time: 1:00 am

Location: T-474 A

Name	✓	Affiliation
Dave Anderson	✓	HS Administration
Peggy Smith	✓	HS Administration
Jane Yung	✓	Attorney General's Office
Sue Clausen	✓	UW Medicine Compliance
Nancy Alarcon	✓	Speech & Hearing Sciences
Anish Padath	✓	EH&S Campus Health Services
Tara Aal	✓	School of Dentistry
Jerry Arnold	✓	School of Dentistry
Cathy Brock	○	Autism Center: <i>Alicia Giunta represented Autism Center</i>
Michele Jacobs	✓	Psychology
Katie Korslund	✓	Psychology
Amanda Patrick	✓	Psychology
Jon Hauser	✓	Psychology
Jeri Carter	○	UW Tacoma Student Wellness
Paul Henderson	○	UW Medicine IT
John Soltys	✓	UW Medicine ITS Security Operations
Christene James	✓	Pharmacy
Ann Nagel	○	CISO

Summary

Updates on recurring topics – Dave Anderson

- Status of incorporation of Notice of Privacy Practices revisions into your operations
 - Components report revised NOPP documents are in use, one component is working with UW Medicine Compliance to ensure correct revisions are in place
- Internal Audit 2014 schedule
 - As of 12-10-13, information still pending. Since the meeting, Dave received an update and will ask for several components to volunteer for the audit
- Health Sciences Administration visit (Dave Anderson) to each clinic – 2014
 - Scheduling to begin in early 2014
- Business Associate Agreement revisions scheduled for September 2014
 - UW Medicine template available
 - Variance noted in BAA signing authority across components; HSA will poll components for summary of current process
 - Questions regarding Office of Inspector General (OIG) exclusion process; Dave will meet with UW Purchasing to confirm their process and application to types of purchases/contracts
 - OIG exclusion link per Sue: : http://oig.hhs.gov/exclusions/exclusions_list.asp

Malware incident – Sue Clausen, John Soltys

- Incident Summary and FAQs attached
- Discussion followed regarding IT security, enterprise- wide system approach to data security

2014 Future needs discussed and reviewed by Dave re: implementation:

- BAA revisions, incorporate into operations
- Vendor security and workforce check process reviewed
- Breach Process restated ; develop compliance web page on HSA website
- Dave to visit components
- Three or four components to volunteer for internal audit visit

Discussed but deferred:

- Telepractice standards; Dave suggests approach through PASS Council , other entities
- Training and re-training for new and existing personnel; Dave acknowledged concern, suggests these may be addressed through existing training mechanisms outside this committee's level

Breach notification policy (from May 2013 University Health Care Component Compliance Meeting)

- 5-20-13 was effective date for HSA notification policy
- Components must immediately notify Dave Anderson, HSA Executive Director, danderso@uw.edu, 206-543-7202 of all suspect issues in order to appropriately activate the 60 day analysis period
 - Jane Yung, AAG, reiterated that any unauthorized mistake must be reported to Dave Anderson; the former harm threshold and significant risk level removed.
 - Analysis of compromises reportable under notification requirements changed significantly
- Once notified, HSA will contact UW Medicine Compliance as the content expert
- Continue to maintain log of accidental disclosure

2014 Meeting Schedule

3rd Tuesday, 1 – 2:00 pm, every other month,

Health Sciences Center T-269 <http://uw.edu/maps/?hst>

- January 21
- March 18
- May 20
- July 15
- September 16
- November 18