

U.S. DEPARTMENT OF  
HEALTH AND HUMAN SERVICES

## OFFICE FOR CIVIL RIGHTS

### Hot Topics for Business Associates and Covered Entities

The University of Texas School of Law  
2017 Essential Cybersecurity Law  
July 28, 2017

*Erica Broussard, JD*  
*Investigator, Southwest Region*

*Meri C. Maguire, JD, CIPP/US*  
*Investigator, Southwest Region*

DHHS Office for Civil Rights

July 28, 2017

## Topics



- Overview of the Office for Civil Rights (OCR)
- Compliance Challenges
- Recent Enforcement Actions
- Audit Program
- Guidance Materials

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2

July 28, 2017

# Overview of OCR

## Overview



### Headquarters - Washington, DC

- Policy and regulations
- Guidance materials
- Centralized Case Management Operations and Customer Response Center
- Audit Program

### Regional Offices - Boston, New York City, Philadelphia, Atlanta, Denver, Dallas, Kansas City, San Francisco, Los Angeles, Chicago, Seattle

- Investigations and Compliance Reviews
- Technical Assistance
- Outreach



# Compliance Challenges for Covered Entities and Business Associates

## Recurring Compliance Issues



- Business Associate Agreements
- Risk Analysis
- Failure to Manage Identified Risk, (e.g., Encryption)
- Lack of Transmission Security
- Lack of Appropriate Auditing
- No Patching of Software
- Insider Threat
- Improper Disposal
- Insufficient Data Backup and Contingency Planning

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## Title search: Hot Topics for Business Associates and Covered Entities

Also available as part of the eCourse

[Cybersecurity: Hot Topics for Covered Entities and Business Associates](#)

First appeared as part of the conference materials for the  
2017 Essential Cybersecurity Law session

"Hot Topics for Covered Entities and Business Associates"