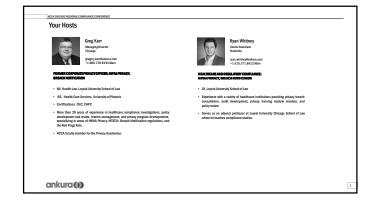


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HCCA Chicago Regional Compliance Conference

FRIDAY, OCTOBER 26, 2018 Presented by: Greg Kerr, MJ, CHC, CHPC Ryan Whitney, JD

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HOCA CHICAGO REG Who We Are

Ankura Healthcare Compliance team helps design, implement, assess, and staff compliance programs. Ankura team members include health care operations consultants, certified coders, clinical analysts, and financial experts.

What We Do

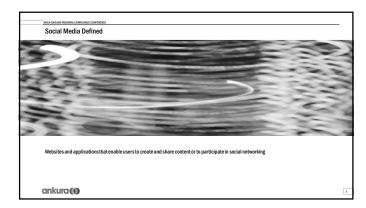
Interim staffing - Compliance, Privacy, Audit, Research

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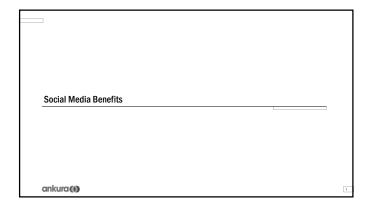
- Program Development
 Risk Assessments and Effectiveness Reviews
- Kisk Assessments and Effectiveness Reviews
 Research Program Reviews
 Coding Audits Inpatient, Outpatient, Specialty
 Clinical Audits
 Education & Training

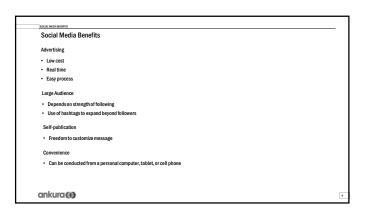
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TODAY'S TOPICS	
SOCIAL MEDIA BENEFITS	
SOCIAL MEDIA DANGERS	
SOCIAL MEDIA AND REGULATORY IMPACT	
HOW COMPLIANCE CAN HELP	
THE PROPER ROLE OF SOCIAL MEDIA IN HEALTHCARE	
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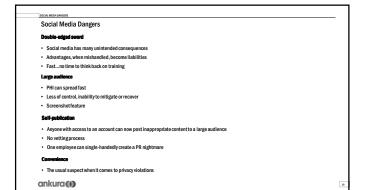


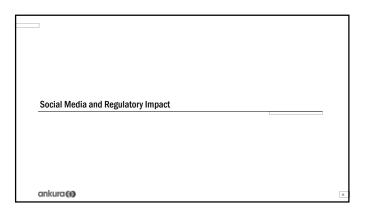
Laws/Regulations Affecting Social Media		
HIPAA Privacy Rule		
HIPAA Security Rule		
• HITECH		
• State Law		
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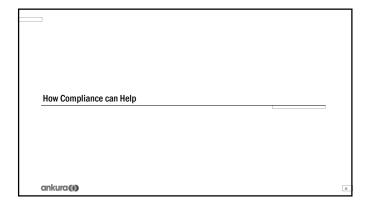


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Social Me	dia Dangers		
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HOW COMPLIANCE CAN HELP Compliance to fill the gap

Compliance programs help bridge the privacy rules with the modern technology Training

- Policies and Procedures

 Both with marketing and the individual employee
- Risk assessment

 What's your risk appetite?
- Compliance and Marketing

 Need for collaboration
 Include Privacy Office/Officer

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HOW COMPLIANCE CAN HELP Posting Do's and Dont's Do: Begin by asking patient for permission to post their PHI If they agree, no further steps needed De-identify each post O Check for labels and computer screens in the background Remove all 17 identifiers as required by the Privacy Rule · Watch out for product logos in a picture ankura 🕡 15

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NOW COMPLIANCE CAN HELP
Posting Do's and Dont's (2)
Don't:
Publish posts that contain PHI without prior patient approval
Don't publish posts that contain any of the 17 identifiers
Don't post without consulting your organization's social media policy and procedure
Ignore the feelings of your patients

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The Proper Role of Social Media in Healthcare

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Inter Proper Role of Social Media in your Organization • Marketing tool • Privacy/Compliance oversight • Heavily emphasized in annual training • Permitted by all staff members? • A question for your organization • Feelings of your patients • De-identifying a photo only absolves you legally, not morally (think ethics)

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In E PROFER ROLE OF SOCIAL MEDIAN MEALTMEARE 10 Tips for Social Media Compliance

- 1. Don't Mention Patient Names: Revealing a patient's name in a Facebook post is considered as identifying protected health information.
- 2. Be Careful With Your Photos: Make sure your photos are free of PHI, including patient names or files. If you plan on featuring a patient in a photo you will need written consent from the patient.
- 3. Create an Organization-wide Social Media Policy: Having a written policy that clearly explains the expectations and regulations can help prevent violations.
- Select Someone Familiar with HIPAA to Be in Charge: Select a team member who knows and understands how HIPAA can impact social media. Allow them to review content before posting it.
- 5. Monitor Your Channels: To help monitor social activity, find a program to help monitor the comments and interaction so they can be reviewed before going live. You can also flag certain words to prevent their comments from becoming public to your followers.

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THE PROPER ROLE OF SOCIAL MEDIA IN HEALTHCARE 10 Tips for Social Media Compliance

- 6. Develop a Strategy: Establish a strategy that determines what content will look like for your organization. This can help deter from posting content that may be called into question.
- 7. Create Canned Responses to Comments: Having the approved and expertly crafted responses not only saves you time, but ensures anything you say is compliant.
- 8. Apply Policies and HIPAA Regulation to Private Accounts: Your Social Media Policy should state that HIPAA should extend to personal ccounts and PHI should never be disclosed on any profiles.
- 9. Never Friend Patients: Along with not posting about patients on social platforms, it's important to not friend them on Facebook or other platforms.
- 10. Take a Look at what Health and Human Services (HHS) Has to Say: To learn more and gather a better understanding of HIPAA and how it applies to social media, visit the <u>HHS website</u>.

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