

## Strategy/Implementation of HIPAA/HITECH

Professional Strategies - S21

Charles Kreling, Executive Director, HIPAA Application Security Program & Information Security Compliance Kaiser Permanente



Sherrie Osborne, Director, HIPAA Application Security Program (HASP)

Kaiser Permanente



Paulina Fraser, Director, Integrated Regulatory Information Security Services (IRISS)

Kaiser Permanente



### **Session Abstract**

This session will provide an overview of Kaiser Permanente's approach to driving HIPAA Security Rule and Privacy Rule (data de-identification only), as well as HITECH (Meaningful Use), compliance. KP's strategies include development of a long-term, business sponsored roadmap for HIPAA Security Rule compliance, deployment of foundational processes and common services, as well as alignment with its Sarbanes-Oxley (SOX) and Payment Card Industry (PCI) programs. Specific topics include:

- Frameworks, policies, and standards
- Risk analysis and risk management (per 45 C.F.R. § 164.308(a)(1) and (2)
- Requirements and guidance
- Common services
- OCR audit preparedness
- Challenges

### **Target Audience**

Leaders and other personnel with responsibilities for strategy, planning, and/or execution of HIPAA Security Rule compliance efforts in IT or the Business. Also those with responsibility for integrating and aligning programs and processed (e.g., rationalized control frameworks, risk standards, HIPAA/SOX/PCI programs).

Skill Level – All levels (e.g., executive to analyst)

Profile – IT (and business) compliance personal (primary focus is HIPAA but integrated with SOX and PCI)

Occupational Experience – Senior leaders to junior level compliance analysts/auditors

## **COBIT Objectives or Processes**

### **Processes for Governance of Enterprise IT**

**Ensure Risk Optimization** 

#### Align, Plan, and Organize

AP001 Manage the IT Framework

AP002 Manage Strategy

AP012 Manage Risk

AP013 Manage Security

#### **Build, Acquire, and Implement**

BA101 Manage Solutions Identification and Build

**BA109 Manage Assets** 

#### **Deliver, Service, and Support**

**DSS06 Manage Business Process Controls** 

#### **Speaker Bio**

# Charles Kreling, Executive Director, HIPAA Application Security Program & Information Security Compliance

Kaiser Permanente

Charles Kreling is an Executive Director in Kaiser Permanente Information Technology as a leader in the Technology Risk Office. Charles is responsible for regulatory compliance for both the HIPAA Security Rule and the Information Security domain. He is charged with integrating and streamlining compliance efforts that span HIPAA Security, Meaningful Use, Sarbanes-Oxley (SOX) and PCI within the security domain.

Charles previously was the Executive Director of Sarbanes-Oxley (SOX) for Kaiser Permanente. Charles held key leadership roles in all aspects of SOX including strategy, risk assessment, scoping, and internal controls design, review and testing for business and information technology.

Before joining Kaiser Permanente in September, 2006, Charles was a Finance/ Information Technology Consultant with Resources Global Professionals (RGP), a publicly traded international professional services firm that specializes in providing a range of financial and business services on a project basis. Charles worked as a consultant to the Northern California Regional SOX team and the SOX PMO for the year prior to his joining Kaiser Permanente.

Previous jobs include Chief Financial Officer/Chief Technology Officer at Bazell Technologies, a small Bay Area manufacturer; Director, Financial Information Systems, with AirTouch Communications; Applications Development Manager/Senior Accounting Manager with the former Pacific Bell; Senior Associate with Coopers & Lybrand (now PricewaterhouseCoopers); and In-Charge Accountant/EDP Auditor with the former Arthur Andersen & Co.

Charles attended the University of California, Berkeley, where he earned a B.S. in Business Administration in 1987. He was awarded a Certificate of Distinction as a finalist for the University Medal. He is a Certified Management Accountant (CMA) and a member of the Institute of Management Accountants.

# **Sherrie Osborne, Director, HIPAA Application Security Program (HASP)**Kaiser Permanente

Sherrie Osborne (CISA, CISM, PMP) directs and oversees execution of Kaiser Permanente's (KP's) HIPAA Application Security Program (HASP). The program focuses on driving compliance with HIPAA Security Rule and Privacy Rule (data de-identification only) requirements, as well alignment and integration with KP's Sarbanes-Oxley (SOX) and Payment Card Industry (PCI) programs. Prior to joining KP, she worked at Sun Microsystems, serving in a variety of leadership roles in IT Compliance, Corporate Finance, Internal Audit, Investor Relations, and Treasury. She has more than 20 years of IT and Finance experience in leading, managing, and integrating high performance teams. She has deep subject matter experience related to compliance with HIPAA Security Rule, Meaningful Use Privacy and Security requirements, and Sarbanes-Oxley (SOX) requirements.

## Paulina Fraser is the Director of Integrated Regulatory Information Security Services (IRISS) Kaiser Permanente.

Paulina has over 10 years of industry experience ranging from development and documentation of formal IT test strategies, internalization of IT SOX testing efforts, and integration of various compliance components into a single framework. Prior to joining Kaiser Permanente, Paulina established a financial management process on a \$243 million PG&E pipeline assessment project that included contracting, timekeeping, goods receipt, and cost forecasting components. Before PG&E, Paulina led several large SOX, PCI, operational, and business process improvement audits at Adobe. In addition, she directed numerous project teams in the assessment, design, and testing of key IT SOX controls for major Protiviti clients, which included comprehensive application reviews over numerous Enterprise Resource Planning (ERP) applications. She has taught several classes on project management best practices and audit approach. Paulina holds a BA degree from Dartmouth College and an MBA from UC Davis. She lives in the Oakland Hills with her husband and two young daughters.

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