



November 25, 2015

**OIG 2016 WORK PLAN:
NEW INITIATIVES TO FOCUS ON SAFEGUARDING ePHI**

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On November 2, 2015, the Office of Inspector General (OIG) released its Fiscal Year 2016 [Work Plan](#). The OIG annually publishes a Work Plan identifying new and ongoing priorities for the agency in the upcoming year. The 2016 Work Plan introduces a number of new initiatives, which emphasize the OIG's heightened scrutiny of electronic protected health information (ePHI).

The Health Information Technology for Economic and Clinical Health (HITECH) Act requires the Office for Civil Rights (OCR) to periodically audit covered entities and business associates to ensure compliance with the HITECH Act and the Health Insurance Portability and Accountability Act (HIPAA). Prior OIG audits reported that OCR had not assessed the risks, established priorities, or implemented controls to fulfill its auditing requirements and, as a result, had limited assurance that covered entities and business associates adequately protected ePHI. Therefore, in 2016 the OIG plans to review the adequacy of OCR's oversight over the security of ePHI.

Similarly, as computerized medical devices are integrated with electronic medical records (EMRs) and the larger health network, there is a growing threat to the security and privacy of ePHI. The OIG has advised that it will examine whether Food and Drug Administration's oversight of hospitals' networked medical devices advances the protection of ePHI appropriately.

While these initiatives highlight the OIG's focus on safeguarding ePHI, the 2016 Work Plan contains over 100 projects that will be implemented or reviewed in the coming year. For more information on the 2016 Work Plan or related issues, please feel free to contact any member of the firm's Health Care Law practice group for further discussion.

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