Coffee and Contracts Summary
The Intersection of Data Security, Compliance, and Quality Improvement: A Hub's Journey
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Speakers
- Abigail Morgan, President & CEO, Direction Home Akron Canton

Topic: The Intersection of Data Security, Compliance, and Quality Improvement: A Hub's Journey

This session focused on the data security and HITRUST certification process from a Community Care Hub (CCH) perspective. Abigail Morgan, the President and CEO at Direction Home, Akron Canton discussed the milestones in her organization's journey to develop their data security infrastructure and lessons learned.

About Direction Home, Akron Canton

Direction Home is an area agency on aging (AAA) that operates in four counties and collaborates with a statewide network in Ohio. They also function as a Community Care Hub (CCH) for a Medicare Advantage Plan. Direction Home manages health plan partnerships, focusing on dually enrolled individuals receiving services, and works with other AAAs across the state.

What is the current state of your contracts, and the types of security requirements included in those contracts?

- Direction Home operates under Business Associate Agreements (BAAs) with health plan partners, requiring the organization to participate in several annual audits.
- Direction Home is HITRUST certified, which is a nationally recognized healthcare data security standard that includes physical security, network security, and privacy.
- Direction Home receives daily censuses, gaps in care reports, and eligibility files from plan partners, which they use to manage patient panels and monitor health records. Additionally, they provide a detailed notice of privacy practices to their members about the data they collect and use.

What was your process for achieving HITRUST Certification?

- Direction Home has been partnering with health plans, including receiving personal health information (PHI), for more than a decade. In 2014, Direction Home experienced its first delegated vendor audit, which included examination of its disaster recovery processes, staff understanding about compliance requirements, staff training, and evidence of the processes and trainings in their organizational policies.

- This audit helped Direction Home identify areas where it fell short of standards and develop improvements. Its health plan partners worked collaboratively with Direction Home and its consultants to continuously mature their data security infrastructure and ultimately achieve HITRUST certification in 2022.

How is quality improvement and compliance connected to [HITRUST](#)?

- An effective healthcare compliance program comprises fundamental elements, such as compliance policies and procedures, a standard of conduct, defined organizational roles, a committee charter, monitoring, auditing, defined training and communication, and a work plan.
- Each program has a formal committee of staff members overseen by the board of directors. It is crucial for staff to understand the purpose of the compliance and security management committees.

What was a milestone on your organization's journey towards data compliance?

- When Direction Home was starting a new contract with a payer, the partner reviewed the organization's IT structure and security program, revealing issues from a recent penetration test and growth-related challenges in the IT department. Together Direction Home and the payer outlined changes needed in IT infrastructure to support the needs of the contract and program. Direction Home committed to working toward HITRUST certification over the course of several years. Ultimately the payer removed the request for achieving certification but Direction Home determined to move forward regardless.

How do you find the right compliance officer for your organization?

- Following word-of-mouth referrals from industry peers who understand their partnerships and structure, as well as working with consultants who instill a sense of urgency about why data security changes need to be put in place.