



2022

ANNUAL COMPLIANCE REPORT

ATSU | A.T. Still
University
FIRST IN WHOLE PERSON HEALTHCARE



2022

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COMPLIANCE REPORT

2022 was a busy year for the Office of the Vice President & General Counsel (VPGC) and A.T. Still University's (ATSU) compliance program. There have been personnel changes, new programs, and lots of strategic compliance work. This report showcases ATSU's work and the strategy driving it.

The planning, strategy, and work for all compliance efforts start with ATSU's Board of Trustees. It sets the vision, which empowers the president to develop and ATSU to implement the University-wide strategic plan. The ATSU Strategic Plan guided the Compliance Strategic Plan, which is aligned with the elements of an effective compliance and ethics program as outlined in federal sentencing guidelines. Employees across all departments then contribute to implementing the plan.

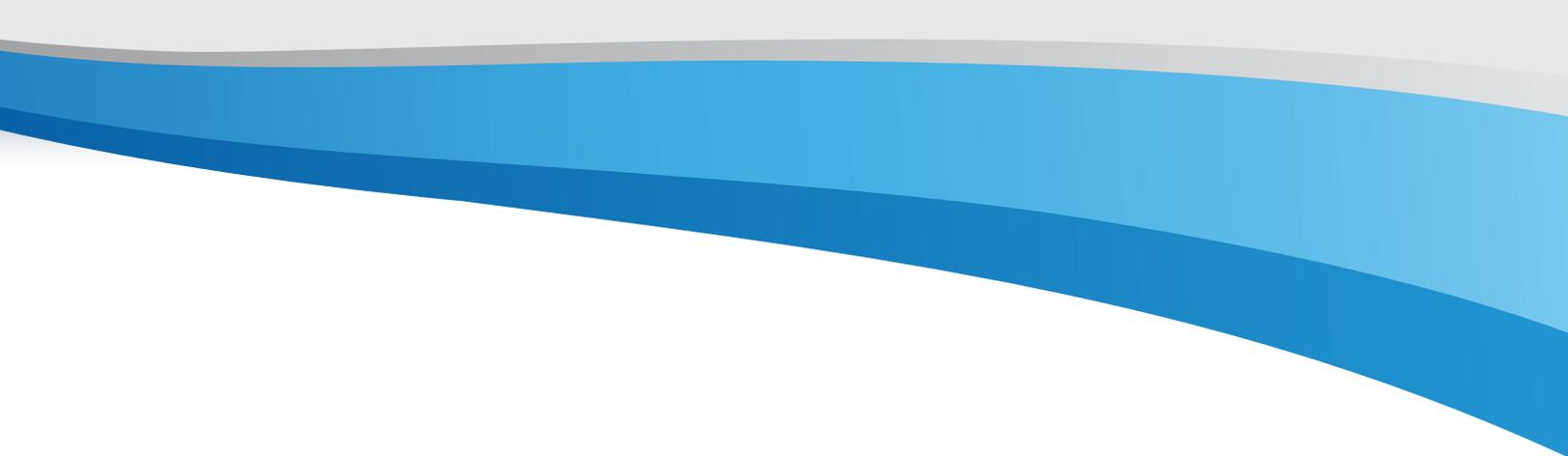
The work and responsibility for compliance is something all ATSU employees and board members hold. It is not the work of any one person or office. It is through the collective hard work of all ATSU that the Office of the VPGC is able to highlight 2022 accomplishments and give context as to how it supports the Compliance Strategic Plan.

If this report brings questions or suggestions to mind, please reach out to Matthew Heeren, JD, vice president & general counsel, or Michelle Gibson, MAL, compliance manager.

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Compliance strategic goals and objectives

1. Development and continuous improvement of compliance practices University-wide
 - a. ATSU policies are robust and compliant with laws and regulations.
 - b. Potential compliance and ethics violations reported free from retaliation.
 - c. Compliance and ethics practices monitored.
 - d. Detected compliance offenses remediated in a timely manner.

2. ATSU stakeholders aware of and accountable for compliance roles and responsibilities.
 - a. Governing body knowledge about compliance program and exercises reasonable oversight.
 - b. Leaders participate in and are accountable to advance compliance in their respective areas.
 - c. Compliance partners comply with applicable laws and regulations.
 - d. Compliance and ethics training and resources available to new and current employees.

2022 highlights

ATSU had a wide range of accomplishments in 2022 supporting the Compliance Strategic Plan. Below is a summary identifying several achievements and the strategic goals each supports.

Biennial HIPAA risk assessment

ATSU contracts with an outside consultant every two years to complete a HIPAA (Health Insurance Portability and Accountability Act of 1996) risk assessment. This assessment measures the risk and vulnerabilities to all systems and processes associated with access to protected health information (PHI).

Achieved: The biennial HIPAA risk assessment was conducted and a risk profile was generated. Assessment areas included ATSU business associates, as well as ATSU security and operational practices. In eight of the 18 assessed areas, no unique or significant vulnerabilities were identified. In the previous 2020 risk assessment, ATSU only had one of 16 assessed areas with no unique or significant vulnerabilities. This is a testament to the hard work of many in previous risk assessments!

Strategic plan goal: Development and continuous improvement of compliance practices University-wide.

Governance, risk, and compliance software

Governance, risk, and compliance (GRC) software is a platform to track compliance-related work University-wide. It allows stakeholders to access and track their compliance work over the course of time, provides task reminders, and stores evidence of completed work.

Achieved: The GRC software has been populated with ATSU compliance information and mapped to applicable federal and state laws and regulations. This platform is also being used by Information Technology Services (ITS) and the compliance office to track ATSU's progress with the National Institute of Standards and Technology cybersecurity and privacy frameworks. Currently, access to the platform is being rolled out to end users in stages, and training on using the system is being provided.

Strategic plan goal: ATSU stakeholders are aware of and accountable for compliance roles and responsibilities.

2022 highlights

HIPAA privacy and breach notification policies and procedures manual

Many federal and state laws and ATSU policies regulate the practices surrounding the privacy of PHI and the steps to take when a breach of these practices has occurred. The manual provides clear direction on appropriately protecting PHI held by ATSU as well as the steps to take when a breach has occurred.

Achieved: The Privacy and Breach Notification Policies and Procedures Manual was developed and rolled out to patient care clinics for use.

Strategic plan goal: Development and continuous improvement of compliance practices University-wide.

DAAPP biannual review

A Drug and Alcohol Abuse Prevention Program (DAAPP) is available for employees and students. Every two years, a complete review of the program is conducted to determine its effectiveness, identify gaps in the program, and to make recommendations for improvements.

Achieved: The DAAPP biennial review was conducted, including a review of policies, employee and student survey results, education and prevention programs, violations and sanctions, and suggestions for improvement.

Strategic plan goal: Development and continuous improvement of compliance practices University-wide.

PCI DSS

The Payment Card Industry Data Security Standard (PCI DSS) provides a baseline of technical and operational requirements designed to protect payment account data. These standards apply to any organization accepting, transmitting, or storing cardholder data.

Achieved: A review of **ATSU Policy No. 50-115** and payment card terminals and vendors was conducted and assessed for PCI DSS compliance. Additionally, ITS at least monthly conducts vulnerability testing and at least annually performs penetration testing on the systems and networks where payment account data is stored, processed, or transmitted.

Strategic plan goal: ATSU stakeholders are aware of and accountable for compliance roles and responsibilities.

Key 2023 initiatives

The following are identified areas of focus for 2023 to continue the strategic improvement of ATSU's compliance program. A few of the highlights are as follows.

GRC software

In 2023, access to GRC software will be rolled out to all stakeholders and training will be provided for all users as they are assigned access. After this rollout, the Office of the VPGC will stop manually tracking compliance matrix items. The software will allow compliance partners to input their compliance tasks and documentation in real time, track progress, and quickly identify and address compliance gaps. A system will also be implemented to ensure the software is routinely updated as regulations change.

Contract management software

In 2023, the Office of the VPGC will roll out updates to the contract management software allowing for the automation of the contract routing process. Updates will include:

- Digitizing the contract routing process.
- Allowing signatories to electronically sign contracts.
- Preserving an audit trail of the contract management lifecycle.
- Providing reminders to stakeholders when contracts are due to expire/renew.

Audits

In compliance with ATSU's audit schedule, audits will be performed to assess the University's compliance with the following laws: the Clery Act, the Drug-Free Workplace Act of 1988, and the Drug-Free Schools & Community Act of 1989.

Culture of compliance

ATSU strives to have a culture of compliance. This means every member of the ATSU community, regardless of position or title, feels their observations and concerns are welcome and valued. Any employee who observes a potential compliance violation or is concerned about any action is not only invited but also required under ATSU policy to bring their concern to the attention of appropriate individuals. Reports may be made to supervisors, Human Resources, or the VPGC. All reports are taken seriously and will be investigated. Employees can feel safe to report without fear of retaliation or negative impact on their job or work environment. ATSU employees are protected by law and under ATSU policy from discrimination and retaliation when making a good faith report.

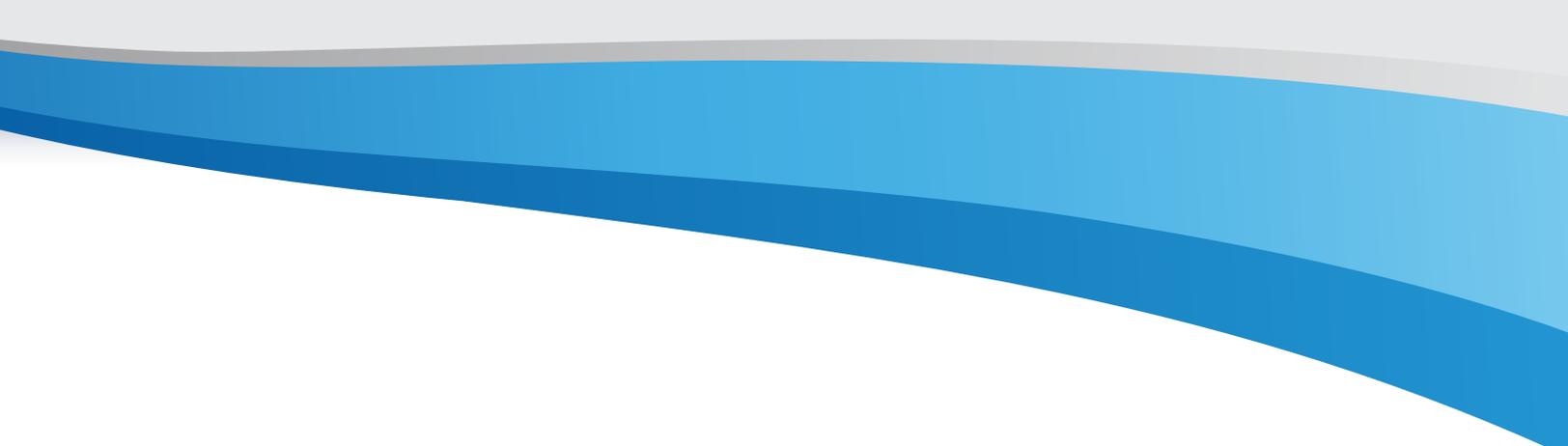
ATSU provides options for anonymous reporting, including a secure online reporting form at fraudhl.com and 24-hour telephone services at 1.855.FRAUDHL (reference company ID “ATSU”). While an anonymous report is harder to investigate, it is better than no report.

See:

Policy No. 10-220: ATSU Code of Ethical Standards

Policy No. 10-216: Whistleblower Policy

Policy No. 90-210: Prohibition of Discrimination, Harassment, and Retaliation



Contact us

Office of Vice President & General Counsel

Matthew R. Heeren, JD
Vice President & General Counsel
mheeren@atsu.edu
660.626.2522

Michelle Gibson, MAL
Compliance Manager
michellegibson@atsu.edu
660.626.2004