



San Francisco Department of Public Health
Office of Compliance and Privacy Affairs (OCPA)

Annual Report to the Health Commission – FY18-19

November 5, 2019

About the Office of Compliance and Privacy Affairs

OCPA implements ongoing efforts to improve and mitigate risks to the San Francisco Department of Public Health, and educates workforce members on how to work with integrity and adhere to regulatory requirements

**Education and
Training**

**Policies and
Procedures**

Assessing Risk

**Investigations
and Corrective
Measures**

FY 18-19 Activities and Accomplishments

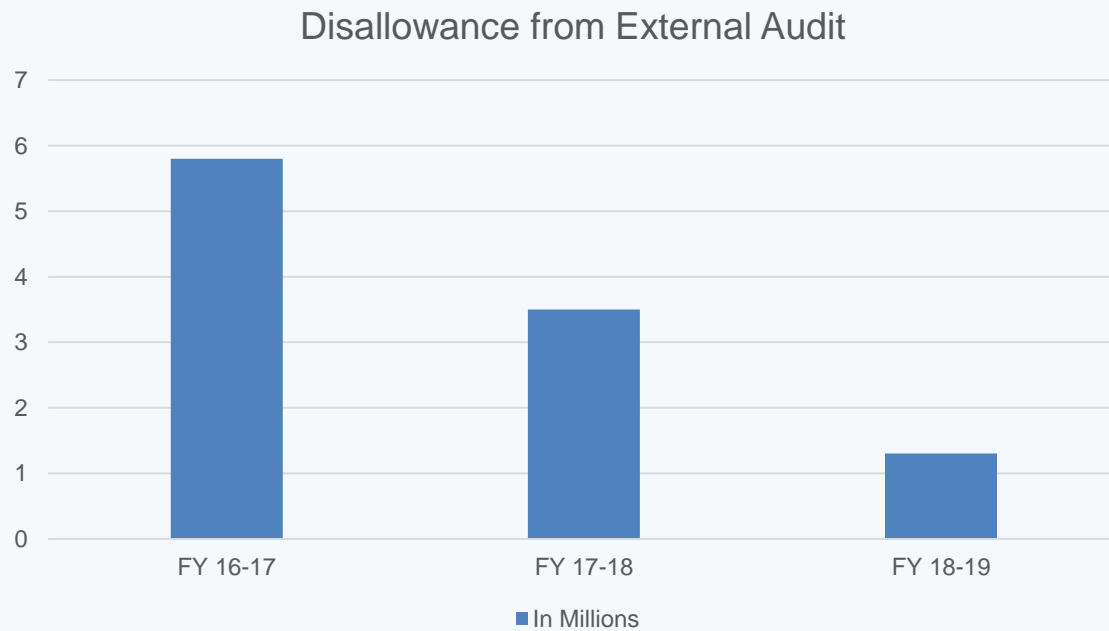
- **Developed New Interactive Privacy and Compliance Training Module**
- **Increased Compliance Monitoring at ZSFG and LHH**
- **Compliance Officer Hired for PHD**
- **New Code of Conduct and Summary**
- **Publication of Bi-monthly Compliance Matters**

Compliance Program Overview

- **DPH Compliance Program helps DPH and its workforce conduct operations and activities ethically; with the highest level of integrity, and in compliance with legal and regulatory requirements.**
- **The goal of the program is to practice and promote good behavior, and avoid conduct that may cause financial or reputational harm to DPH.**
- **OCPA partners with department managers to identify and manage risks; provide education and training to staff and providers, and integrate compliance into the daily operations of DPH.**

Compliance Program Trends

- **Decrease in Disallowances from Incorrect Claims**

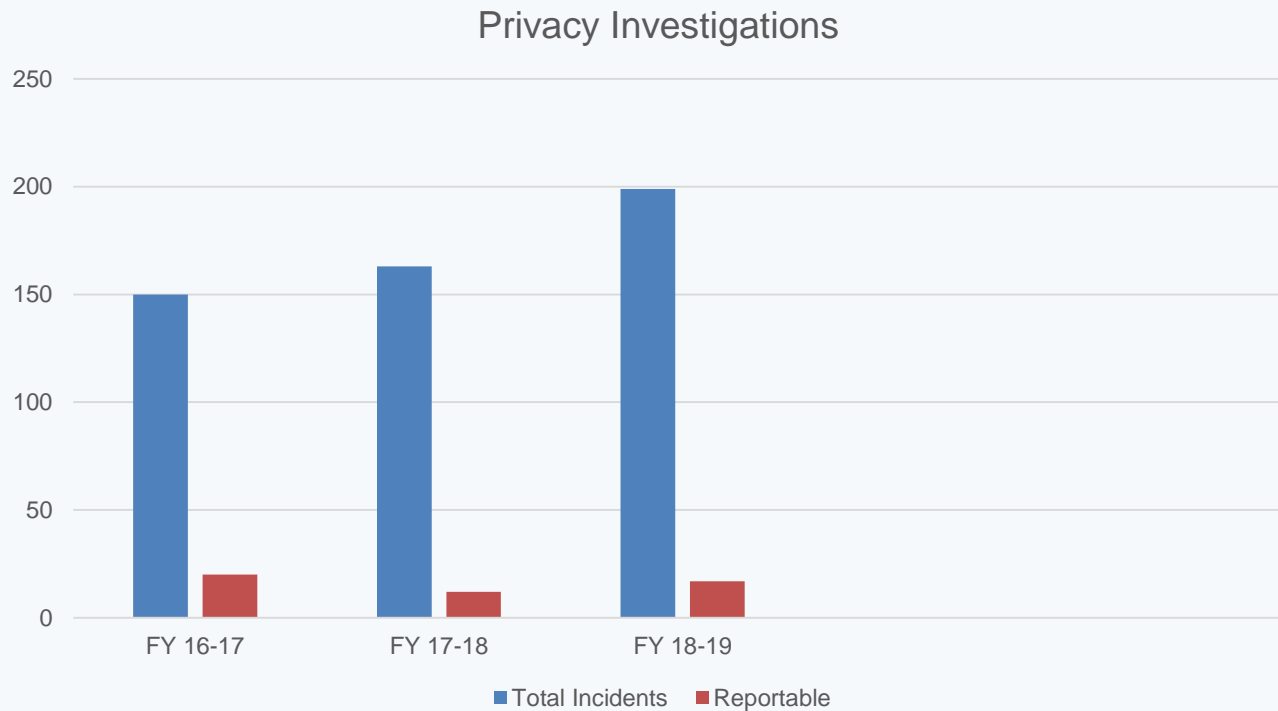


Privacy Program Overview

- **The Privacy Program is intended to:**
 - 1. Ensure the confidentiality, integrity, and availability of all Protected Health Information (PHI) that DPH creates, receives, maintains or transmits;**
 - 2. Protect against any anticipated threats or hazards to the security or integrity of such information;**
 - 3. Protect against improper disclosures; and**
 - 4. Ensure compliance by its workforce.**
- **OCPA works to engage and educate staff at all levels to protect patients' privacy by providing practical tips on privacy protection.**

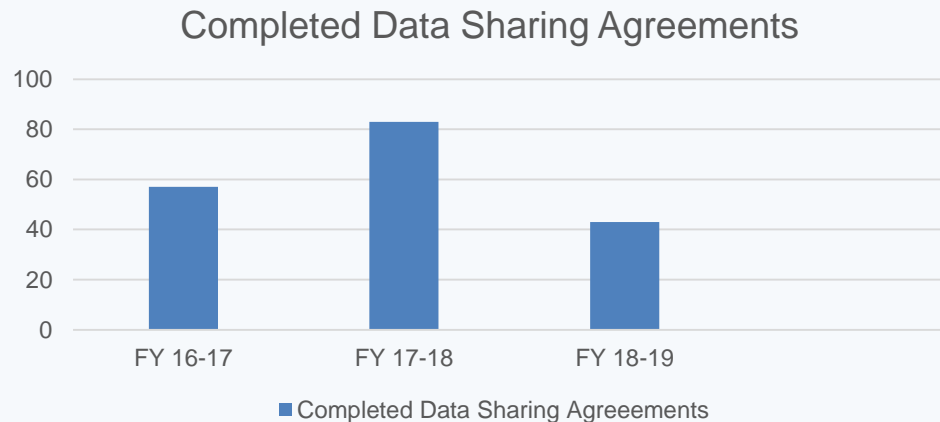
Privacy Program Trends

- **Increased Reporting of Potential Breaches**



Data Sharing

- **Allows for Legal Sharing of PHI with Vendors/Partners**
 - **Established Agreements Related to Sharing PHI**
 - **Registers and Monitors Data Sharing Agreements**
 - **Assures Checks are Completed Before Sharing (Data Security, Privacy, Business Need)**
 - **Assists with Continuum of Care Allowing for Shared Data of Clients**

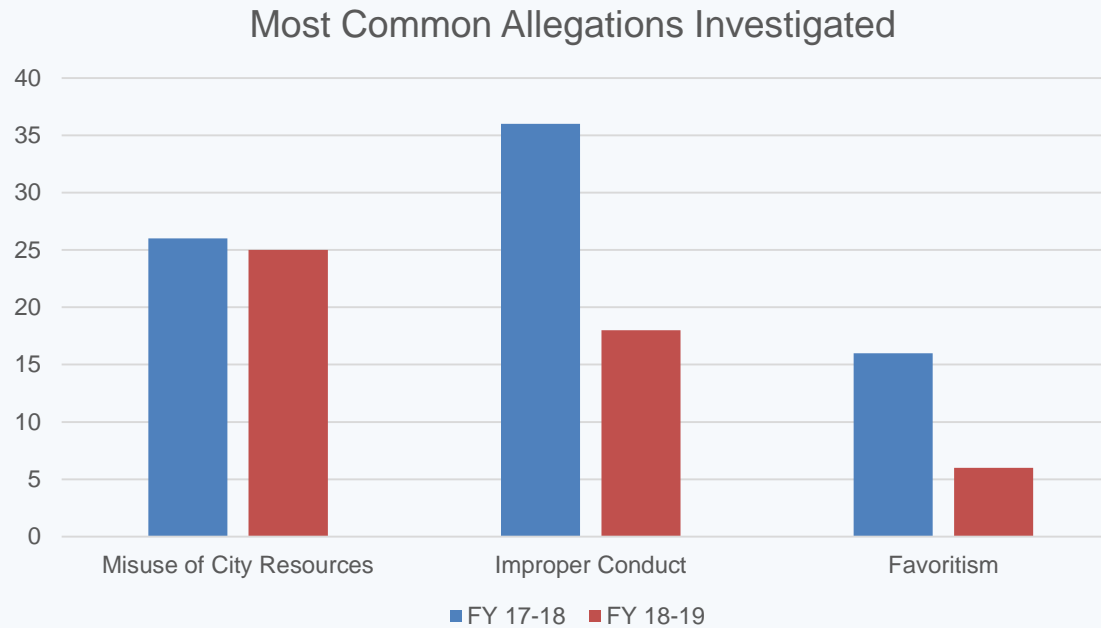


Whistleblower Program

- **Investigate complaints related to:**
 - **Allegations of fraud, waste, and abuse;**
 - **Privacy Breaches;**
 - **Suspected violations of the DPH Code of Conduct, DPH policies, and Conflicts of Interest;**
 - **Theft or Misuse of DPH and/or City Resources; Nepotism/Favoritism**
- **Maintain 24/7 toll-free Compliance and Privacy Hotline to provide safe place for employees to report suspected violations**

Whistleblower Program

- **Complaints Investigated FY 17-18 = 74**
- **Complaints Investigated FY 18-19 = 61**



Moving Forward in FY19-20

- **Develop DPH-wide Compliance Program**
 - **Establish Executive Level Compliance Committee**
 - **Hire Additional Compliance Officer**
 - **Risk Assessment for Areas without Formal Program**
- **Increased Monitoring for Unauthorized Access to Records**
 - **Monitoring Through EPIC Tools and Reports**
 - **Dedicated Staff to Audit and Monitor Access to Records**
 - **Develop Audit Tracer Protocol**
- **Increased Education and Outreach for Compliance and Privacy**
 - **Live Refresher Trainings**
 - **Targeted Topics to Risk Areas**