HFMA/NEHIA

2026 Compliance & Internal Audit Conference

Wednesday, December 2 – Friday, December 4, 2026
Mystic Marriott Hotel, Groton, CT

Beyond the Firewall: A CISO's Guide for Compliance, Privacy, and Internal Audit Leaders

December 3, 2026

Beyond the Firewall: A CISO's Guide for Compliance, Privacy, and Internal Audit Leaders



Bruce Forman
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Paul Hastings



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Southcoast Health



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Agenda

- The Evolving Role of the Healthcare CISO
- Cybersecurity as an Enterprise Risk & Cross-Functional Partnership
- Security Rule & Regulatory Readiness
- AI, Data Governance & Emerging Technology
- Resilience, Business Continuity & Third-Party Risk
- Practical Takeaways and Rapid Fire

HIPAA Security Rule NPRM — What's Changing

Proposed rule — not yet final · NPRM published January 6, 2025

Mandatory baseline controls

Encryption, MFA, network segmentation, and anti-malware/config hardening move from addressable to required, with narrow exceptions.

Rigorous risk analysis & documentation

Structured threat/vulnerability scoring, a current asset inventory and network map, and written documentation of every policy and analysis.

Testing & audit cadence

Vulnerability scans every 6 months, penetration testing and compliance audits annually, and annual review of control effectiveness.

Incident & contingency response

72-hour system restoration target, criticality analysis for restoration priority, and 24-hour notification triggers for key events.

Business associate oversight

Annual SME-verified certification from BAs and subcontractors, plus new group health plan sponsor obligations.

Regulatory status

Comment period closed March 2025. OMB's Unified Agenda now targets July 2027 for a final rule — no compliance deadline yet.

Source: 90 FR 898 (Jan 6, 2025 NPRM) · OMB Unified Agenda RIN 0945-AA22 — final action currently targeted July 2027

QUESTIONS

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NEW ENGLAND HEALTHCARE INTERNAL AUDITORS INC.