

Clearwater's

Rural Critical Access Connect

With Jackie Mattingly

Uniting Cybersecurity Leaders for Resilient Healthcare

Meeting Logistics



Microphones

All attendees are on mute for first half



Open Breakout Room

Second half off mute and on camera for breakout time



Questions

Type your questions in the chat.



Resources

Upcoming events & resources linked.



Recording

Recording of the first half will be provided after event



Survey

Survey will prompt when you leave



Agenda & Speakers

- Introductions
- Educational Content: Resilience on a Budget
- Q+A Open Breakout Room



Jackie Mattingly, Ph.D., CHPS, CDH-E, CHISL, CISSP

Sr. Director, Consulting Services, Regional & Critical Access Hospitals Clearwater



Chad Walker, CHISL, CISSP, CEH, CDH-E

Principal Consultant, vCISO

Clearwater



Heather Hanson, CBCP

Manager, Consulting Services, Resiliency Services Clearwater



Resilience on a Budget





Regulatory Pressures Impacting Rural Hospitals



Big Beautiful Bill

RISKS (Pressures):

Medicaid funding changes

- ✓ Reduces/restructures supplemental Medicaid relied on by rural/critical access hospitals
- Creates instability compared to prior predictable, statedirected funding

OPPORTUNITIES (Offsets):

\$50B Rural Health Transformation Program (RHTP)

- ✓ STATE-DRIVEN: Applications due 11.5.25; CMS approvals by 12.31.25
- ✓ Half of funds distributed equally to approved states; half distributed competitively based on rural metrics



CMS Promoting Interoperability

RISKS (Pressures):

Annual SAFER Guide Requirements

- ✓ Required attestation since 2022
- ✓ Often skipped/misunderstood or treated as a checkbox
- ✓ Risks of non-compliance if audited

OPPORTUNITIES (Offsets):

Reimbursement Protection and Practical Value

✓ Properly documenting reviews = compliance and double as readiness tools for downtime and resiliency



Joint Commission

RISKS (Pressures):

Downtime Preparedness

- Must maintain documented downtime & emergency operations plans
- ✓ Staff must be trained and drilled annually
- ✓ Sentinel Event Alert #67 (Dec 2022): Cyberattacks must be included in emergency preparedness

OPPORTUNITIES (Offsets):

- ✓ Compliance & Accreditation
- ✓ Resiliency = Patient Safety
 - Ensure continuity of clinical operation during cyber events
 - Builds staff confidence and reduces chaos during real incidents



HIPAA Security Rule - NPRM (Proposed)

RISKS (Pressures):

Stronger Requirements

- √HHS NPRM (RIN 0945-AA22) remains active; final rule targeted for May 2026
- ✓Anticipated updates (just a few):
 - More prescriptive risk analysis & management expectations
 - Clearer requirements for vendor management
 - Stronger emphasis on governance & leadership accountability

OPPORTUNITIES (Offsets):

- ✓ Hospitals will have time to align (~12 months)
- Pushes organizations towards best practices already in use
- ✓ Reduces compliance risks and improves resilience



Understanding Why Resilience Is A Must

Rural hospitals face increasing cybersecurity threats, especially ransomware, which can disrupt operations, compromise patient care, and lead to closures.

Memorial Hospital and Manor (GA): A 2024 ransomware attack forced staff to revert to paper records, disrupted care, and exposed data of ~120,000 individuals.

St. Margaret's Health (IL): A cyberattack contributed to its permanent closure due to irreparable financial and operational damage.

Change Healthcare Attack: This 2024 incident disrupted billing nationwide, hitting rural providers hardest due to limited financial reserves.

Key Lessons for Business Continuity

- □ Collaboration: Build networks with other providers and agencies for crisis response.
- Resource Prioritization: Focus limited budgets on cybersecurity and staffing.
- Operational Flexibility: Prepare alternative workflows like telehealth and manual systems.
- Vendor Management: Vet third-party vendors and plan for service outages.
- ☐ **Human Impact**: Account for patient travel burdens and staff stress during disruptions



The Path to Resilience

Resilience Planning is an ongoing function with an intentional lifecycle. Plans need to adapt as quickly as your environment does.

Impact Assessment:

- Identify critical functions and their dependencies
- Understand and align function recovery time objective expectations

Strategy Development & Document (Planning)

Develop and document response procedures

Training and Awareness

☐ Train staff and leadership on roles & responsibilities, communications process, and response procedures

Exercising

- Exercise plans twice per year, at minimum
- Exercise tactical response
- Exercise Executive and Leadership response.

Governance & Maintenance

Review and update quarterly and/or when material changes occur





How To Get Started On Your Resilience Journey

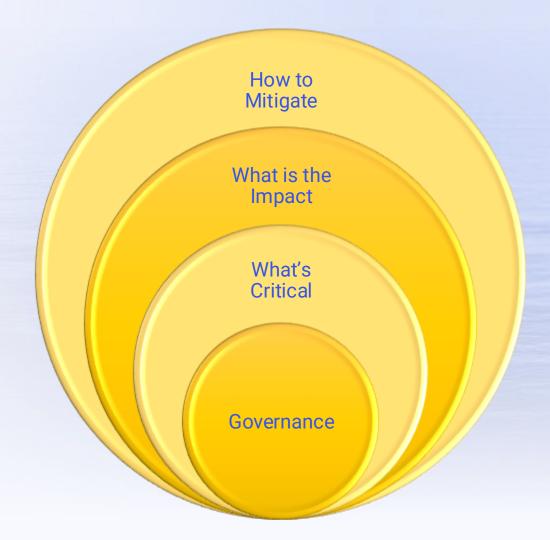
Especially with rural hospitals, understanding where to start is key.

Clinical Disruption

- Patient Safety
- Downtime Procedures
- Logistics

Operational Resilience

- Critical Functions & Processes, People
- Service Impacts
- Dependencies
- Downtime Estimates
- ☐ Tiered Recovery Priorities
- Response & Recovery Capabilities







Breakout Session Time-Move to the Connect Lounge

If you are just joining, please enter the breakout room now.

Upcoming Webinars



AHLA Webinar: Health Care's Due Diligence Dilemma | September 16, 2025 | 2:00 – 3:00 pm ET

- Andrew Mahler, VP Privacy and Compliance Services presenting on how organizations can address cybersecurity and data privacy challenges during health care mergers and acquisitions.
- Register <u>here</u>



Secure and Compliant: OCR-Quality® Risk Management in Action | October 1, 2025 | 12pm – 1pm CT

- Steve Cagle, CEO, Clearwater
- Lori Dutcher, CCO at Beth Israel Lahey Health
- Dave Bailey, VP Security Services, Clearwater
- Will Explore how healthcare organizations can build and sustain OCR-quality risk management programs that go beyond checkbox compliance



Speaking the Same Language:
Building Trust Between
Security and the Enterprise |
Monthly Cyber Briefing
| October 9

- Fireside chat with Clearwater's CEO, Steve Cagle and Tracy Touma, Cybersecurity Business Liaison, Cleveland Clinic
- Register Here



Register here 10

Upcoming Events



Nashville Healthcare Sessions | September 29-30, 2025 | Nashville, TN

- Several Clearwater Colleagues attending Nashville Healthcare Sessions, the nation's premier healthcare innovation event.
- Learn More & Register here





Hospital Horizons Symposium 2025 | October 6–7, 2025 | Washington, DC

- Clearwater is proud to sponsor the second annual Hospital Horizons
 Symposium, hosted by Holland & Knight.
- Andrew Mahler speaking on an Innovation Panel on Oct 7th.
- Register & learn more <u>here</u>



SCALE Healthcare Leadership Conference | October 14, 2025 | New York, NY

- Clearwater is a proud sponsor
- Clearwater leading a panel discussion "Understanding Cyber Security Risks in a world of AI"
- Learn more & Register <u>here</u>



We are here to help.

Moving healthcare organizations to a more secure, compliant, and resilient state so they can achieve their mission.



Healthcare-Secure, Compliant, Resilient

www.ClearwaterSecurity.com

800.704.3394

LinkedIn | linkedin.com/company/clearwater-security-llc/

Legal Disclaimer

Although the information provided by Clearwater Security & Compliance LLC may be helpful in informing customers and others who have an interest in data privacy and security issues, it does not constitute legal advice. This information may be based in part on current federal law and is subject to change based on changes in federal law or subsequent interpretative guidance. Where this information is based on federal law, it must be modified to reflect state law where that state law is more stringent than the federal law or other state law exceptions apply. This information is intended to be a general information resource and should not be relied upon as a substitute for competent legal advice specific to your circumstances. YOU SHOULD EVALUATE ALL INFORMATION, OPINIONS AND RECOMMENDATIONS PROVIDED BY CLEARWATER IN CONSULTATION WITH YOUR LEGAL OR OTHER ADVISOR, AS APPROPRIATE.

Copyright Notice

All materials contained within this document are protected by United States copyright law and may not be reproduced, distributed, transmitted, displayed, published, or broadcast without the prior, express written permission of Clearwater Security & Compliance LLC. You may not alter or remove any copyright or other notice from copies of this content.

*The existence of a link or organizational reference in any of the following materials should not be assumed as an endorsement by Clearwater Security & Compliance LLC.

