



# Jackson HEALTH SYSTEM



**Blaine Kerr,**  
Chief Privacy Officer



**J.C. Palacio,**  
Associate Director of  
Compliance and Ethics



## Client Profile

Jackson Health System is a nonprofit academic health system serving Miami Dade County with more than 12,000 employees and 2,468 beds across six hospitals and multiple clinics and care facilities.



## Challenge

Jackson Health System's compliance audit tool created a reactive, rather than a proactive, workflow when faced with patient complaints and incident reports. As a robust health system with a massive, diverse workforce, Jackson needed to create a landscape where user access was closely monitored – and investigations streamlined.



## Solution

FairWarning Patient Privacy Intelligence®  
FairWarning Managed Privacy Services



## Results

- 157 alerts per week upon implementing FairWarning to now 70 per week
- 8-10 million lines of Cerner EMR data sent to FairWarning Patient Privacy Intelligence Platform daily
- Facilitation of workforce compliance program education and a strong culture of privacy and compliance

## Jackson Health System Streamlines Investigations, Strengthens Privacy Program with FairWarning

With multiple hospitals, clinics, and care facilities, Jackson Health System (Jackson) is a robust healthcare system with thousands of users accessing the Protected Health Information (PHI) in their systems. They have a compliance audit tool, but without a system that could alert them to access suspicious activity, their response to any potential incidents had to be reactive. By implementing the FairWarning Patient Privacy Intelligence® platform and partnering with the Managed Privacy Services team, the Miami-based health system has streamlined investigation time to focus on other aspects of its privacy program and nurtured a culture of compliance that puts patient care first.

## Overview

In today's largest healthcare systems, monitoring and controlling access to PHI can be a complex process. Jackson faced the challenge of *managing diverse access needs*. The nonprofit academic medical system has more than 12,000 employees and 2,468 beds across six hospitals and multiple specialty care centers, plus multiple academic affiliations. Associate Director of Compliance and Ethics, J.C. Palacio, faced many investigations in an average month, "purely from allegations and incidents reported to our office – and that resulted in me burning the midnight oil on most evenings."

**Jackson**  
HEALTH SYSTEM



*With proactive monitoring we are given the peace of mind and a streamlined workflow when it comes to making informed decisions about potential violations."*

– **Blaine Kerr**  
Chief Privacy Officer



## The privacy challenges of a complex healthcare system

Jackson's close affiliation with multiple academic organizations provides the healthcare system and its patient population with a diverse array of healthcare professionals. However, the mix of physicians, medical students, students in nursing, allied health professions and residents adds to the complexity to its patient privacy and data security program – more eyes on the data, more potential for violations, less clarity around what constitutes proper access, and a sprawling workforce to educate.

*The lack of a proactive monitoring solution meant Jackson's privacy compliance team had to operate reactively at times.*

"Without proactive monitoring, our privacy/compliance team was spending countless hours manually investigating alerts," said Blaine Kerr, Chief Privacy Officer. "We incorporated this in conjunction with our multi-layered workforce education program with traditional training tactics, as well as our advanced technologies."

*Since many investigations take place after the fact, Jackson's privacy team was left piecing the puzzle together.*



"Our user activity on a given day can generate between 8 million and 10 million lines of activity on an Excel spreadsheet," J.C. said. "Manually interpreting the audit logs is not the best use of our time."

## The solution to investigative accuracy, compliance & education

Jackson is a complex health system. *This made the leadership very receptive to a platform that could better monitor and investigate PHI access across a diverse healthcare enterprise and offer access and audit controls as required by HIPAA.* After a thorough vetting process, Blaine and his team implemented the FairWarning Patient Privacy Intelligence platform (PPI) to bolster privacy and compliance auditing.

According to Blaine, Jackson immediately improved the accuracy of its audit and incident investigation process thanks to the FairWarning platform's ability to interface with critical applications, including the Cerner EMR, and FairWarning's Intelligent Filtering capabilities.



# Jackson's results with FairWarning

Jackson Health System immediately saw positive results from their use of PPI and partnership with FairWarning's Managed Privacy Services (MPS). With between 8 million and 10 million lines of Cerner EMR data sent to FairWarning daily, Jackson has gone from an average of 157 alerts per week at implementation to just 70 per week after applying the PPI platform's Intelligent Filtering technology.



"FairWarning has reduced false alerts by half through Intelligent Filtering, which gives us the time to enhance our privacy program," said Blaine. The bottom line is that FairWarning enables us to quickly make informed decisions when it comes to potential privacy and security incidents."

*J.C. added that the MPS team has saved him a tremendous amount of time that was previously dedicated to working all those investigations late into the evening.*

"Reviewing audit logs can be a very manual process," he said. "The fact that we have PPI generating alerts and MPS analyzing them allows us to focus on other aspects of our privacy program."

This has also helped them respond more quickly to incidents. "We don't have to spend up to 15-20 days investigating audit logs before we can start talking to people," he said. "It cuts down on the time it takes us to investigate a potential issue and notify patients and the federal government, if need be."

*MPS's expertise, years of experience, and high-level of certifications brings value to Jackson Health Systems' team.* Since MPS serves over 3,000 healthcare facilities, they can recognize scenarios from their experience with other top care providers, which gives Jackson Health the peace of mind that any investigations that are opened are likely for a legitimate cause.

## The future of compliance

“Being in the heart of Miami-Dade County means that we have a lot of people of interest who are patients,” Blaine said, “so we can use FairWarning to proactively target those people to look for the potential of unauthorized access.”

Thanks to a culture of education, privacy, and compliance, Jackson is also able to manage the number of alerts generated by their two initial FairWarning enforced policies. MPS has also helped with the care provider’s transition, ensuring they weren’t overwhelmed by a high number of alerts.

“Our team at FairWarning set us up for success, and they partnered with us to put our program in a position to succeed,” J.C. explained.

In a complex healthcare system like Jackson, where there are diverse access requirements and a sprawling pool of users, there are opportunities by which the way threats are detected, investigated, mitigated, and remediated.

*With FairWarning, Jackson’s privacy and compliance teams can ensure they adapt to rapidly shifting access and privacy needs while providing the patient population with the best care possible.*

“It’s a tenuous tightrope that we walk to make sure we are not unfairly accusing our workforce of unauthorized access as well as protecting our patient’s privacy, and FairWarning helps enables us to do so,” concluded Blaine.



***We do not have to spend as much time investigating audit logs before we can start talking to people. FairWarning helps us do that. It cuts down on the time it takes us to investigate a potential issue and notify patients and the federal government, if need be.***

**– J.C. Palacio**

Associate Director of Compliance and Ethics

## Expanding Compliance and Audit Allies With FairWarning

Jackson has been able to strengthen their privacy and compliance program thanks to FairWarning.

“FairWarning helps us ensure complete and thorough documentation of privacy investigations,” said Blaine.

As part of their plan to educate the workforce about FairWarning, Blaine and J.C. make site visits to system facilities and departments.

“In addition to having an EMR, most organizations still have paper processes and aren’t conscious of the ramifications of what can go wrong,” said Blaine. “So it helps to personally interact with the workforce and introduce yourself and work through these challenges.”



***In my opinion it's so important to reach out to all hospital departments,” Blaine said. “Workforce members are not only crucial allies to productive investigations and our privacy/compliance program, but they appreciate that we see how important they are to patient privacy and outcomes by including them in the process.”***

**- Blaine Kerr**  
Chief Privacy Officer



### About Jackson Health System

Jackson Health System is a nonprofit academic medical system offering world-class care to any person who walks through its doors. Serving the residents of Miami-Dade County through an integrated healthcare delivery system, Jackson Health System has an employee base of 12,000 and 2,468 beds across six hospitals and a network of urgent primary, specialty care centers, and clinics.



### About FairWarning

FairWarning grows trust in an increasingly interconnected world by protecting people from the harm of having their most sensitive data compromised. Our patented cloud-based platform and managed services simplify the full life-cycle of privacy and insider security incident management. FairWarning helps satisfy key regulatory requirements across multiple industries and localities, including HIPAA and HITRUST.



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