HCRR 109 Top 10 Healthcare Compliance Risk Areas Managers Need to Know

Presented February 18, 2026 by PYA's Shannon Sumner, Miriam Murray, and Katie Croswell | Part of the Healthcare Regulatory Roundup Webinar Series

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WEBINAR SUMMARY

This episode of PYA's Healthcare Regulatory Roundup webinar series identifies ten high-priority healthcare compliance risk areas that organizations should monitor in 2026. The presenters emphasize that compliance risks increasingly intersect with technology, vendor relationships, and operational complexity; specifically noting outsourced service providers, cybersecurity, AI, digital transformation, and healthcare real estate. Key points included the importance of due diligence, vendor management, and monitoring for risks such as data breaches and cyberattacks. The discussion highlighted the need for robust AI governance, proper documentation, and continuous training. Additionally, the significance of EMTALA compliance, exclusion screenings, and managing reimbursement pressures were stressed. Best practices for mitigating these risks involve comprehensive risk assessments, strong policies, and ongoing auditing and monitoring.

Key topics include:

- Healthcare compliance, compliance risk areas, cyber security, data breaches, AI, digital transformation, outsourced service providers, vendor management, EMTALA, exclusion screenings, reimbursement pressures, administrative compensation, third party risk, healthcare real estate
- Outsourced service providers and third-party vendors introduce privacy, cybersecurity, billing, and operational risks that require structured due diligence, onboarding controls, performance monitoring, and documented oversight.
- Cybersecurity, data breaches, artificial intelligence adoption, and digital transformation require governance structures, formal risk assessments, access monitoring, incident response protocols, and workforce training.
- Traditional risk areas remain critical, including administrative compensation documentation, healthcare real estate fair market value compliance, EMTALA screening and stabilization obligations, exclusion screenings, and reimbursement pressure monitoring.
- A strong compliance program, supported by executive leadership, effective reporting mechanisms, documented investigations, and ongoing auditing and monitoring, remains the primary defense against regulatory exposure.

WEBINAR HIGHLIGHTS AND FREQUENTLY ASKED QUESTIONS

What are the top healthcare compliance risk areas in 2026?

- Key risk areas include third-party vendor oversight, cybersecurity and data breaches, artificial intelligence governance, digital care documentation, healthcare real estate arrangements, EMTALA compliance, exclusion screenings, and reimbursement pressures.

Why are outsourced service providers considered a compliance risk?

- Outsourced vendors can introduce privacy, billing, cybersecurity, and operational risks, and organizations remain responsible for monitoring and mitigating those risks even when services are outsourced.

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How can healthcare organizations manage third-party risk effectively?

- Organizations should implement a third-party risk management life cycle that includes due diligence, onboarding controls, defined performance metrics, continuous monitoring, and structured offboarding procedures.

What compliance risks are associated with artificial intelligence in healthcare?

- AI tools may affect documentation, coding, clinical decision support, and data privacy, requiring governance committees, risk assessments, monitoring controls, and clear policies on appropriate use.

What are common EMTALA compliance vulnerabilities?

- Common vulnerabilities include inconsistent medical screening documentation, incomplete transfer records, outdated on-call rosters, insufficient staff training, and inadequate signage.

Why are exclusion screenings important in healthcare compliance programs?

- Employing or contracting with excluded individuals can result in repayment obligations, civil monetary penalties, and False Claims Act exposure, making continuous screening essential.

How do reimbursement pressures create compliance risk?

- Tight margins, denial management challenges, prior authorization complexity, and value-based payment expectations can increase the risk of billing errors, documentation deficiencies, and audit exposure.

What role does leadership play in reducing healthcare compliance risk?

- Executive and board-level support is essential to establish reporting channels, allocate compliance resources, oversee investigations, and maintain effective auditing and monitoring programs.

ACTION ITEMS

- Test and strengthen the overall compliance program by documenting reporting channels, investigating allegations, and enhancing auditing and monitoring functions across the identified risk areas
- Provide EMTALA refresher training to ED staff, verify EMTALA signage and on-call rosters, and audit screening and documentation practices to ensure complete medical screening, stabilization, and transfer notes
- Design and implement a continuous exclusion screening process (monthly) covering employees, contractors, vendors and any provider ordering services, and document the process owner and retention of screening records
- Assess reimbursement pressures and implement monitoring and mitigation actions (denial management, prior authorization workflows, technology and staffing efficiency, and payer audit readiness)
- Implement quarterly access reviews and strengthen access controls (including multi-factor authentication and timely termination of access) to reduce unauthorized access and human-error breaches
- Conduct an organization-wide AI inventory and perform an AI-specific risk assessment, and establish an AI governance committee to set policies, access rules, monitoring, auditing, and incident response for AI tools
- Develop or update digital-care policies and procedures (telehealth, RPM/RTM, EHR/AICD documentation, patient intake apps) and implement monitoring and audit routines to ensure appropriate documentation and billing

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- Reconcile and validate healthcare real estate leases, establish a centralized contract/lease tracking system, and consider an independent fair-market-value review where appropriate to address space creep and staff-utilization risks
- Create or update a centralized third-party vendor inventory and implement a third-party risk management lifecycle (due diligence, onboarding checklist, performance metrics, monitoring, offboarding) for outsourced service providers

WEBINAR OUTLINE

Introduction and Overview of New Changes and Impacts for Rural Healthcare in 2026

- PYA Moderator introduces the webinar and the topic: Top 10 Healthcare Compliance Risk Areas.
- Shannon Sumner welcomes attendees and mentions the focus on making compliance topics more engaging.
- Shannon Sumner introduces her colleagues, Marian Murray and Katie Croswell, and outlines the topics to be covered.
- Emphasis on cyber security, data breaches, AI, digital transformation, and digital care as key topics.

Outsourced Service Providers and Risk Management

- Shannon Sumner discusses the increasing use of outsourced service providers in healthcare.
- She highlights the risks associated with outsourced service providers, including privacy, cyber security, and HIPAA compliance.
- Shannon notes the importance of business associate agreements and due diligence in vendor management.
- She describes best practices for monitoring and mitigating risks from outsourced vendors, including inventory management and contractual terms.

Third-Party Risk Management Life Cycle

- Shannon Sumner explains the concept of third-party risk management life cycle.
- She details the steps involved in the life cycle: due diligence, onboarding, risk assessment, monitoring, performance evaluation, and offboarding.
- Shannon notes the importance of having concrete performance metrics and monitoring vendor performance.
- She discusses data security and privacy breaches, including due diligence in vendor selection and monitoring.

Administrative Compensation and Compensation Stacking

- Shannon Sumner introduces the topic of administrative compensation and compensation stacking.
- She emphasizes the need for proper documentation and monitoring of administrative services provided by physicians.
- Shannon describes the risks associated with compensation stacking, where providers are paid for the same services twice.
- She notes the importance of having clear contracts and timesheets to avoid double dipping.

Cyber Security and Data Breaches

- Miriam Murray discusses the increasing risks of cyberattacks and data breaches in healthcare.

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- She highlights common ways hackers gain access, including ransomware, unauthorized access, and human error.
- Miriam emphasizes the importance of monitoring and auditing access to systems, including third-party vendors.
- She details best practices for mitigating cyber risks, including strong IT policies, risk assessments, and incident response protocols.

Artificial Intelligence and Digital Transformation

- Miriam Murray highlights the growing use of artificial intelligence in healthcare.
- She highlights the importance of understanding how AI systems are being used and the risks associated with them.
- Miriam discusses the need for an AI governance committee to oversee AI systems and ensure compliance.
- She details best practices for managing AI risks, including comprehensive inventories, risk assessments, and incident response protocols.

Healthcare Real Estate and Compliance

- Miriam Murray discusses the risks associated with healthcare real estate and compliance.
- She emphasizes the importance of ensuring fair market value for leases and conducting regular reviews.
- Miriam gives examples of the risks of space creep and the need for proper documentation and monitoring.
- She describes best practices for managing healthcare real estate, including reconciliation, data management, and contract management systems.

EMTALA Compliance

- Katie Croswell discusses the importance of EMTALA compliance, especially during high flu and COVID cases.
- She describes the risks of turning patients away and the need for appropriate medical screening and documentation.
- Katie notes the importance of having accurate on-call rosters, consistent screening protocols, and complete transfer notes.
- She details best practices for maintaining EMTALA compliance, including training staff and having appropriate signage.

Exclusion Screenings

- Katie Croswell explains the importance of exclusion screenings to prevent employing excluded providers.
- She explains the risks of employing excluded providers, including financial penalties and reputational damage.
- Katie lists the best practices for conducting exclusion screenings, including continuous monitoring and maintaining up-to-date provider listings.
- Katie and Miriam discuss the importance of having a strong process in place to respond quickly if an excluded provider is identified.

Reimbursement Pressures

- Katie Croswell discusses the challenges of reimbursement pressures and tightening margins.

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- She details the risks associated with denial management, technology costs, and prior authorization requirements.
- She states the importance of staying up-to-date with billing rules and value-based care requirements.
- Katie and Miriam discuss best practices for managing reimbursement pressures, with a particular focus on implementing AI tools to improve provider efficiency.

Conclusion and Next Steps

- Katie Croswell emphasizes the importance of having a strong compliance program in place, support from top leadership, proper reporting mechanisms, and effective auditing and monitoring.
- Katie emphasizes the importance of continuous training and education for staff to maintain compliance.
- PYA Moderator provides contact information for further questions and mentions that slides and recordings of the webinar are available at pyapc.com.

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