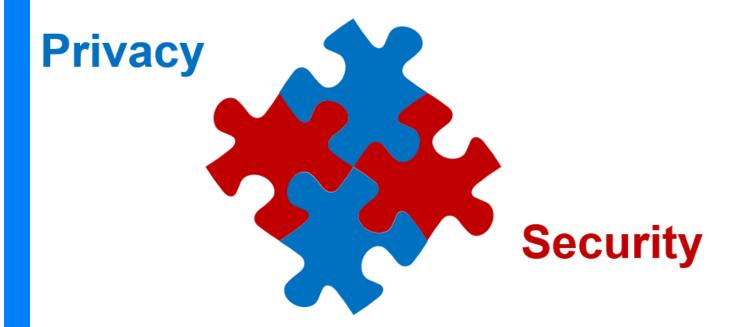


Supplement to Health Industry Cybersecurity – Coordinated Privacy and Security Partnerships (CPSP)

Executive Summary



Executive Summary

Healthcare, as a recognized critical infrastructure, is comprised of various entity functions:

- Delivery of direct patient clinical services by providers, medical systems, laboratories;
- Health plans and payers;
- Pharmaceuticals, medical materials, and health information technologies:
- · Public health entities: and
- Federal partners, coordinated response providers, and emergency services.

Whether an enterprise is small or large, the care and safety of patients and healthcare consumers are at the center. Patients and healthcare consumers trust and expect that:

- Their confidential and sensitive data is being acquired, used, disclosed, and protected in accordance with applicable laws, regulations, and best practice standards;
- They can exercise certain transparent rights and control over the availability, accessibility, and interoperability of their data;
- The data kept about them is accurate such that health entities can make fully informed decisions; and
- Their clinical health outcomes, safety, quality of care, and privacy are not impacted by a cybersecurity event.

The board of directors and senior executives trust and expect that:

- Patients and consumers remain safe;
- Applicable laws and regulations are understood and followed by the business;
- The business mission, vision, and strategic priorities are being supported and carried forward through corresponding departmental strategies, governance, and feedback metrics;
- Known risks and vulnerabilities are identified and mitigated to offer protections; and
- Human, financial, and other resources are being effectively and efficiently used.

Through the interpretation of complex and ever evolving laws and regulatory landscapes, Privacy and Security are the areas tasked with implementing policies and controls that govern data protection. They execute interdependent and cross-functional principles, frameworks, and strategies in an attempt to protect data, keep patients safe, and the business operational from threats.

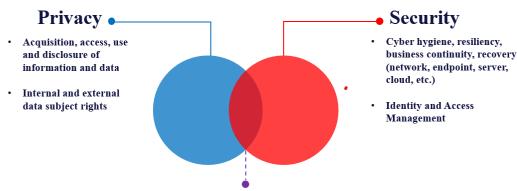
The Coordinated Privacy & Security Partnerships (CPSP) resource provides information about challenges contributing to increased entity risk, that can occur between Privacy and Security, despite having the same protection goals when:

 The language or frameworks used are misunderstood operationally by each resulting in team dynamic difficulties, redundancy of efforts, or poor execution of incident response measures when time is of the essence;

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- Company tone, culture, or board oversight is inadequate leading to misaligned reporting structures, lack of adherence to strategic goals, inconsistent policies and procedures; or
- Regulations are misinterpreted which can inadvertently set the entity up for non-compliance and implicate audits, fines, or other corrective actions.

More importantly though, this resource highlights the ways that Privacy and Security can proactively and cohesively work together. It provides practical suggestions of collaborative practices seeking to accomplish this in the interests of the patient and the enterprise alike through the use of shared executive sponsorship, combined governance, and tabletop exercises, as a few examples. The infographic below provides an overview of basic areas of coverage for Privacy and Security with twelve (12) areas for partnership providing ways to influence efficiency and potentially reduce enterprise risk.



Areas of Collaboration That Can Reduce Enterprise Risk and Offer Resource Efficiencies

- · Training & Education
- Incident Response
- Third Party Contracting
- Vendor Risk Assessment
- Metrics
- Governance
- Board Engagement
- Merger & Acquisition Due Diligence
- Key Risk and Performance Indicators
- Privacy & Security by Design
- Data Maintenance, Retention, & Destruction
- Application & Tool Usage

About the HSCC Cybersecurity Working Group

The Health Sector Coordinating Council (HSCC) Cybersecurity Working Group (CWG) is a government-recognized critical infrastructure industry council of more than 400 healthcare providers, pharmaceutical and medtech companies, payers and health IT entities partnering with government to identify and mitigate cyber threats to health data and research, systems, manufacturing and patient care. The CWG membership collaboratively develops and publishes freely-available healthcare cybersecurity best practices and policy recommendations, and produces outreach and communications programs emphasizing the imperative that cyber safety is patient safety. See https://HealthSectorCouncil.org.

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