



Health Sector Coordinating Council
Cybersecurity Working Group

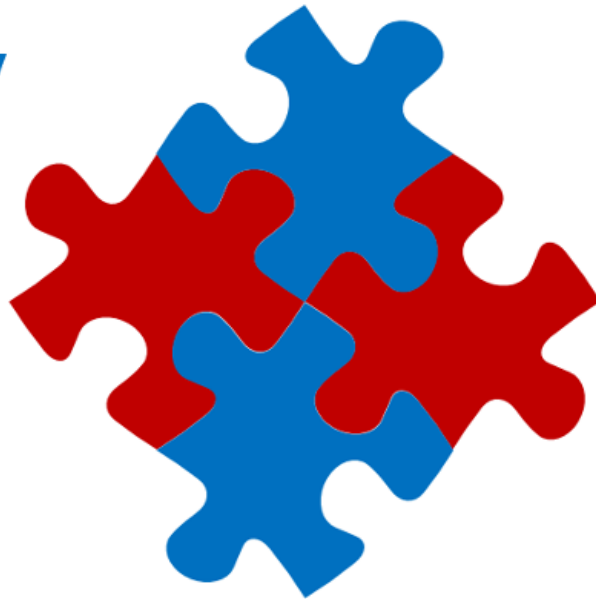


**Manage
Risks**

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

FAQ

Privacy



Security

FEBRUARY 2024

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What is the purpose of the Coordinated Privacy and Security Partnerships (CPSP)?

As cyberattacks and data breaches of private information continue to increase in both frequency and severity, there is significant evidence that neither regulations nor enterprise compliance and risk management programs approach these interdependent responsibilities with coherent and coordinated policy and practice.

This publication seeks to do the following:

- Identify intersections, interdependencies, and regulatory and operational distinctions between enterprise Privacy and Security disciplines;
- Enumerate potential challenges and corresponding risks arising from gaps and/or misalignments between Privacy and Security functions and priorities;
- Describe differing structural advantages and disadvantages for coordinating or integrating functions; and
- Recommend options for frameworks, practices, and measures that can assist with informing, coordinating, and integrating Privacy and Security compliance and operations efforts.

Who is the intended audience?

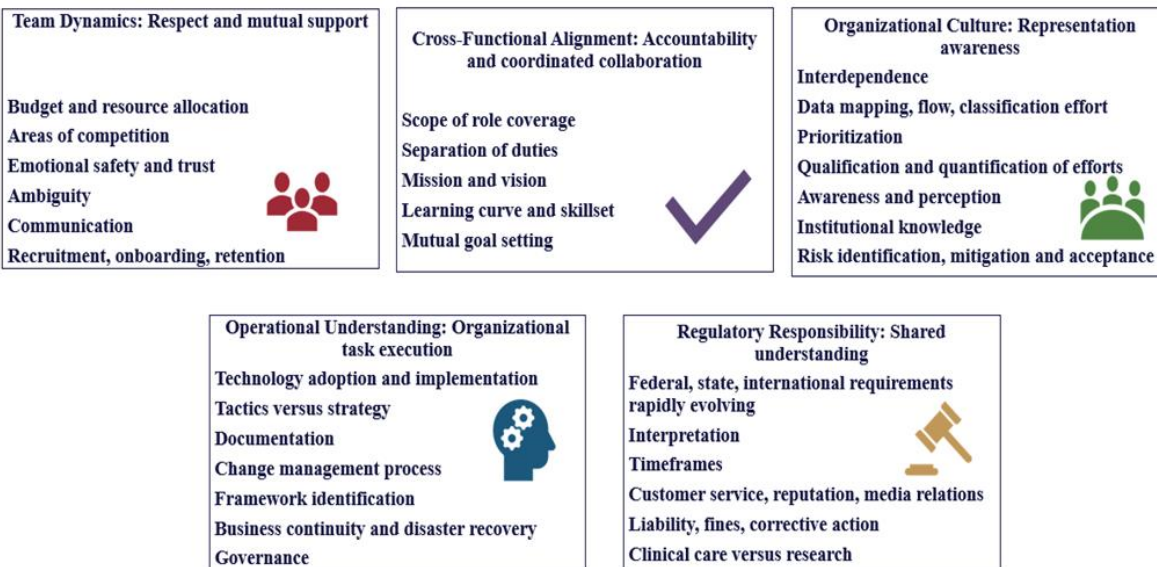
The intended audience for this document includes healthcare Privacy, Security, and Compliance leaders, their accompanying teams, and others looking to develop best practices for Privacy and Security programs and policies.

What collaboration challenges do privacy and security face?

Factors ranging from organizational structure to conflicting priorities can lead to disconnect between Privacy and Security, increasing organizational risk. The challenges arising from the separation and individualization of Privacy and Security roles, each with their own isolated strategies, can impact an organization in unanticipated ways.

Collaboration challenges fall into five overarching themes: (1) cross-functional alignment, (2) operational understanding, (3) team dynamics, (4) organizational culture, and (5) regulatory responsibility.

5 Themes

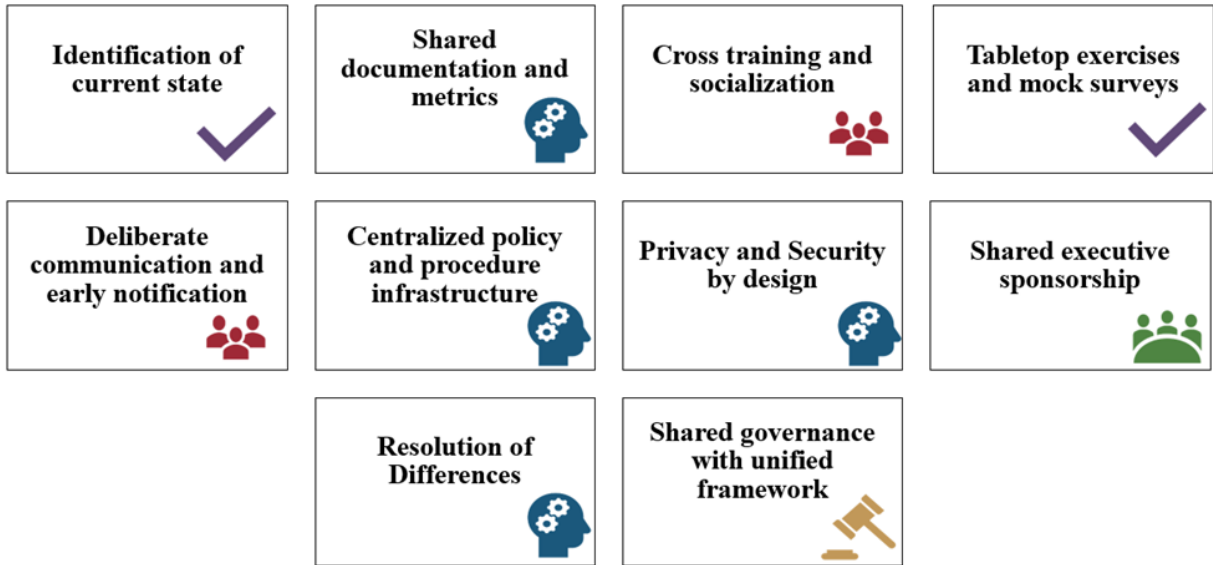


What are some best practices to address these challenges?

The CPSP offer 10 best practices to address the challenge themes. These include:

- Identification of the current state
- Preparation of shared documentation and metrics
- Providing cross-training, education, and opportunities for socialization
- Conducting regular tabletop exercises and mock surveys
- Building processes for deliberate communication and early notification
- Creating a centralized policy and procedure infrastructure
- Implementation of Privacy & Security by Design
- Identification of shared executive sponsorship and support
- Creation of a cross functional governance structure with a shared framework
- Creation of an appropriate setting and consistent opportunity to resolve differences

10 Best Practices



What other information is provided in the CPSP?

The Coordinated Privacy and Security Partnership publication reinforces the importance of the need for cohesive Privacy and Security collaboration. It offers practical suggestions and practices, a RACI template to initiate discussions of individual and joint activities, emphasizes the importance of engagement with the board of directors, and informs of the current types of organizational structures in place and considerations for Privacy and Security. The CPSP encourages Privacy related functions that can align with the Health Industry Cybersecurity Practices (HICP) 10 Mitigating Practices.

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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