

DIGITAL TECHNOLOGY: PRIVACY AND SECURITY CHALLENGES



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PANEL PARTICIPANTS

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WHAT IS IT ALL ABOUT?

- For those of us that use software, applications, portals and other products, there are many considerations around privacy and security that need to be worked out between the purchaser (us) and the vendor.
- Many of these are outside the scope of technical set up and require collaboration, good questions, and strong communication to make sure there are no gaps that could expose or compromise member information.

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COLLABORATION

- How do you share the responsibilities for digital technology between privacy and security staff at your organization?
- How do you manage oversight for those responsibilities?

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BUSINESS ASSOCIATES

- How do you oversee the responsibilities the business associate has to make sure your technology is secure and private?
- What is your process to trust but verify for certain responsibilities a vendor may have? Like patient acknowledgements, logging or identity management.
- What do you do if there are differences in interpretation with the vendor on privacy or security?

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TECHNOLOGY CHALLENGES

- Do you allow other business owners/ stakeholders of technology to manage controls or be administrators? Why or why not?
- Who reviews release notes or upgrade specifications to capture impacts to security and privacy?
- How are you getting metadata, logging and other data from the vendor if there is a breach?

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PATIENT CONSENT AND PARTICIPATION

- If patient consents or information is gathered, how do you balance the expectations of the vendor with the need for completeness and integrity?
- Who manages the content of terms and conditions or end user license agreements for patients?

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RISK ASSESSMENT

- How do you ensure both security and privacy staff are brought into the vetting process for vendors prior to procurement?
- How do you document technology with shared privacy or security responsibilities into your risk assessment?

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CLOSING THOUGHTS FROM THE PANEL

- Check out HIPAA COW's Policy Site
- Questions

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