

Building a Proactive Privacy Program

Lessons Learned in Prioritization and Socialization

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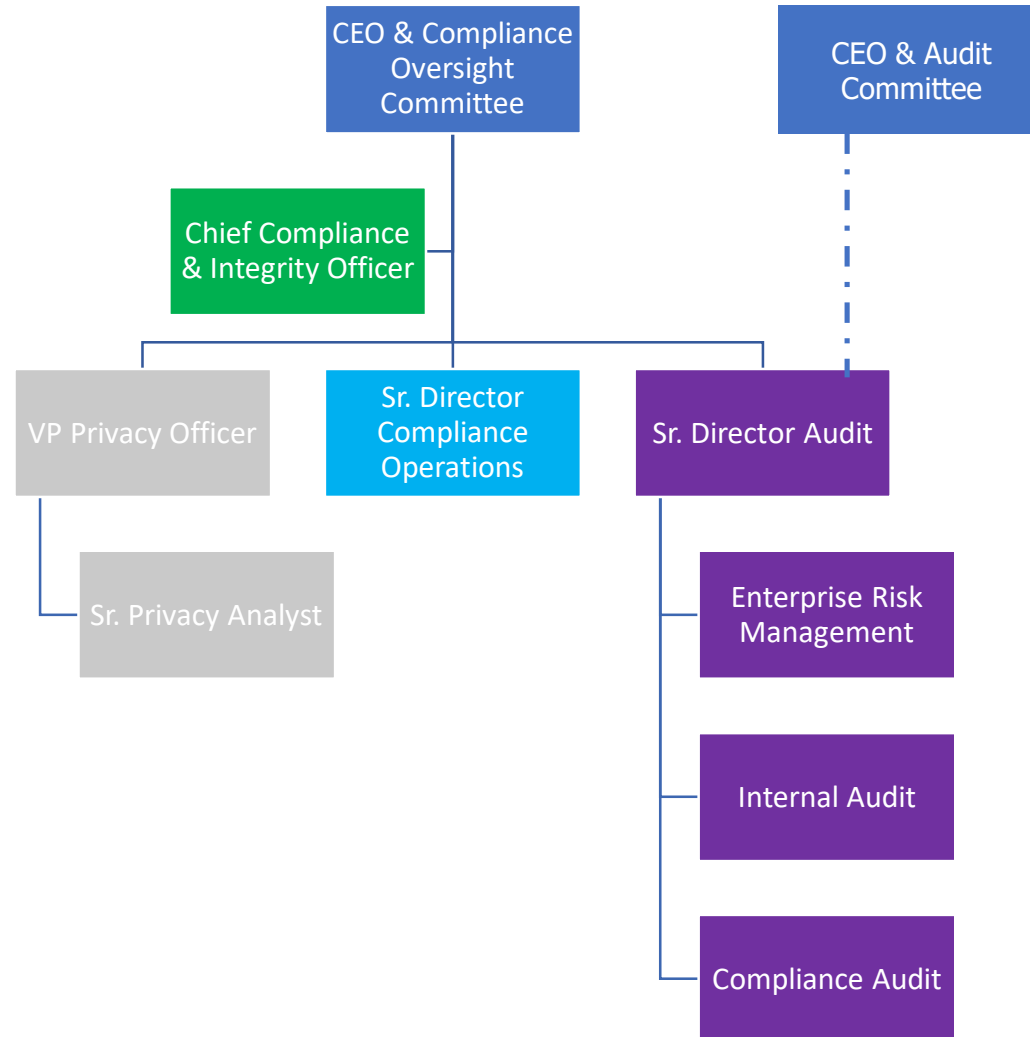
Ann & Robert H. Lurie Children's Hospital of Chicago



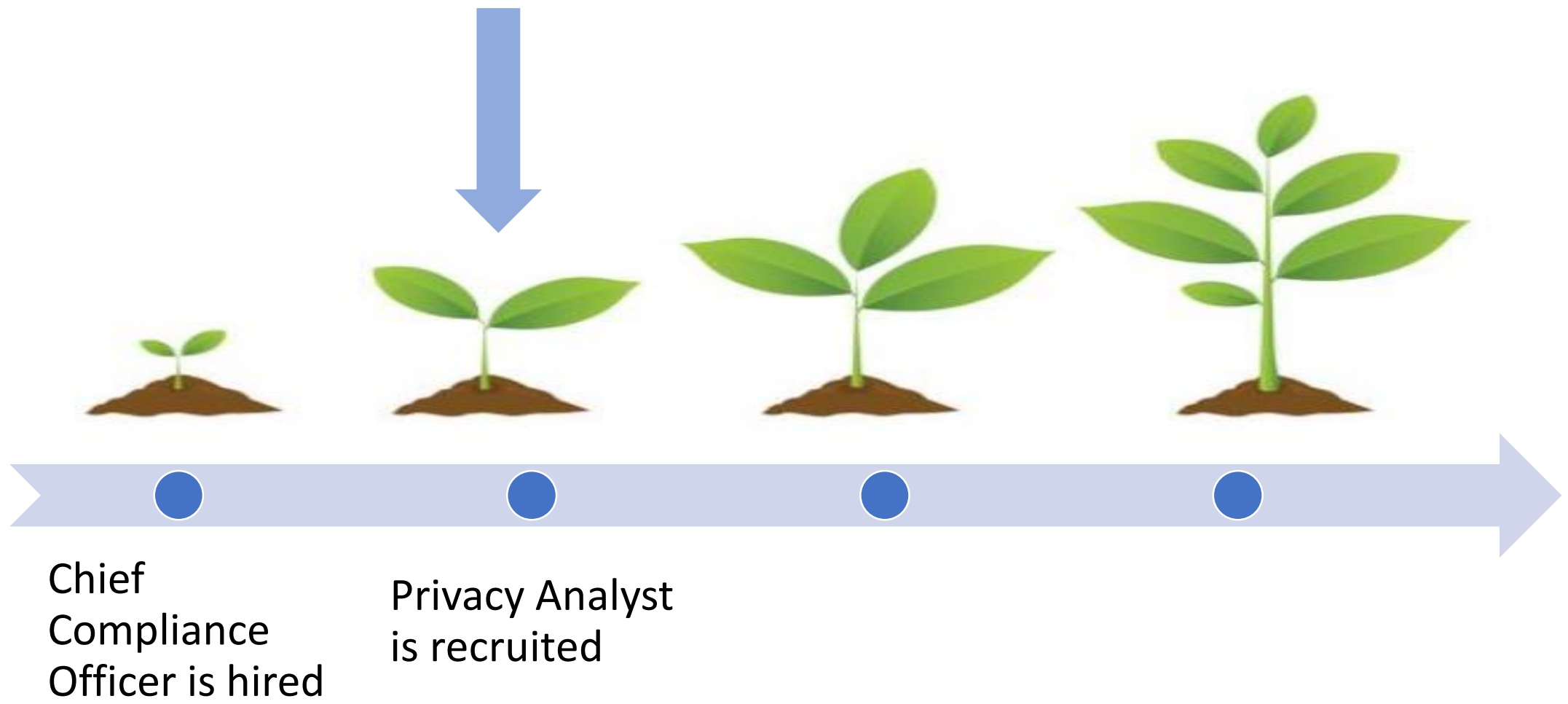
Ann & Robert H. Lurie Children's Hospital of Chicago

- Founded in 1882 as the Maurice Porter Memorial Hospital, nurse and mother Julia Foster Porter established a 4-bed cottage
- 70 pediatric specialties and subspecialties

Structure: Office of Compliance & Integrity

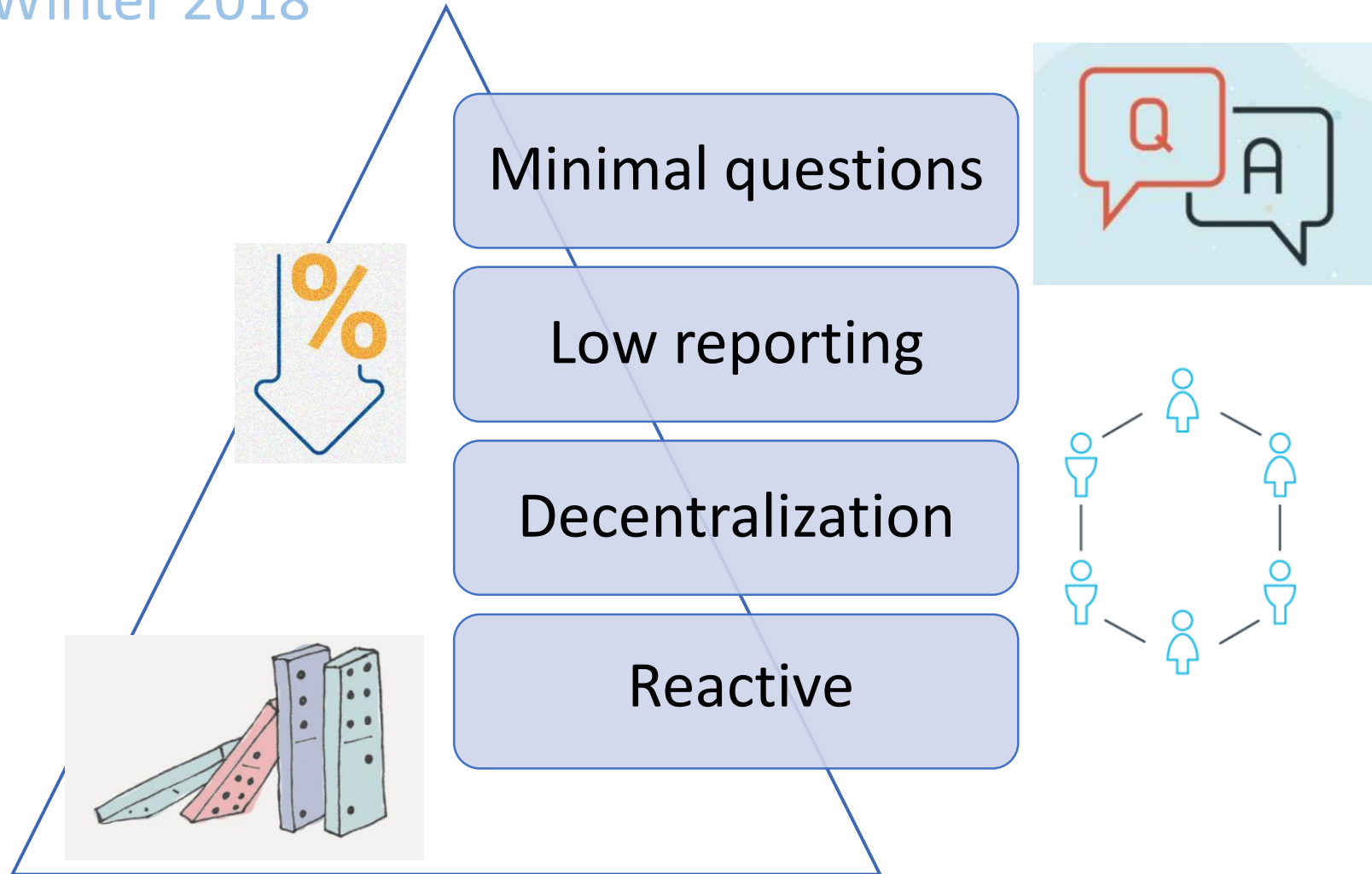


The Birth of a Privacy Program



Characteristics of Developing Program

Summer 2018/Winter 2018

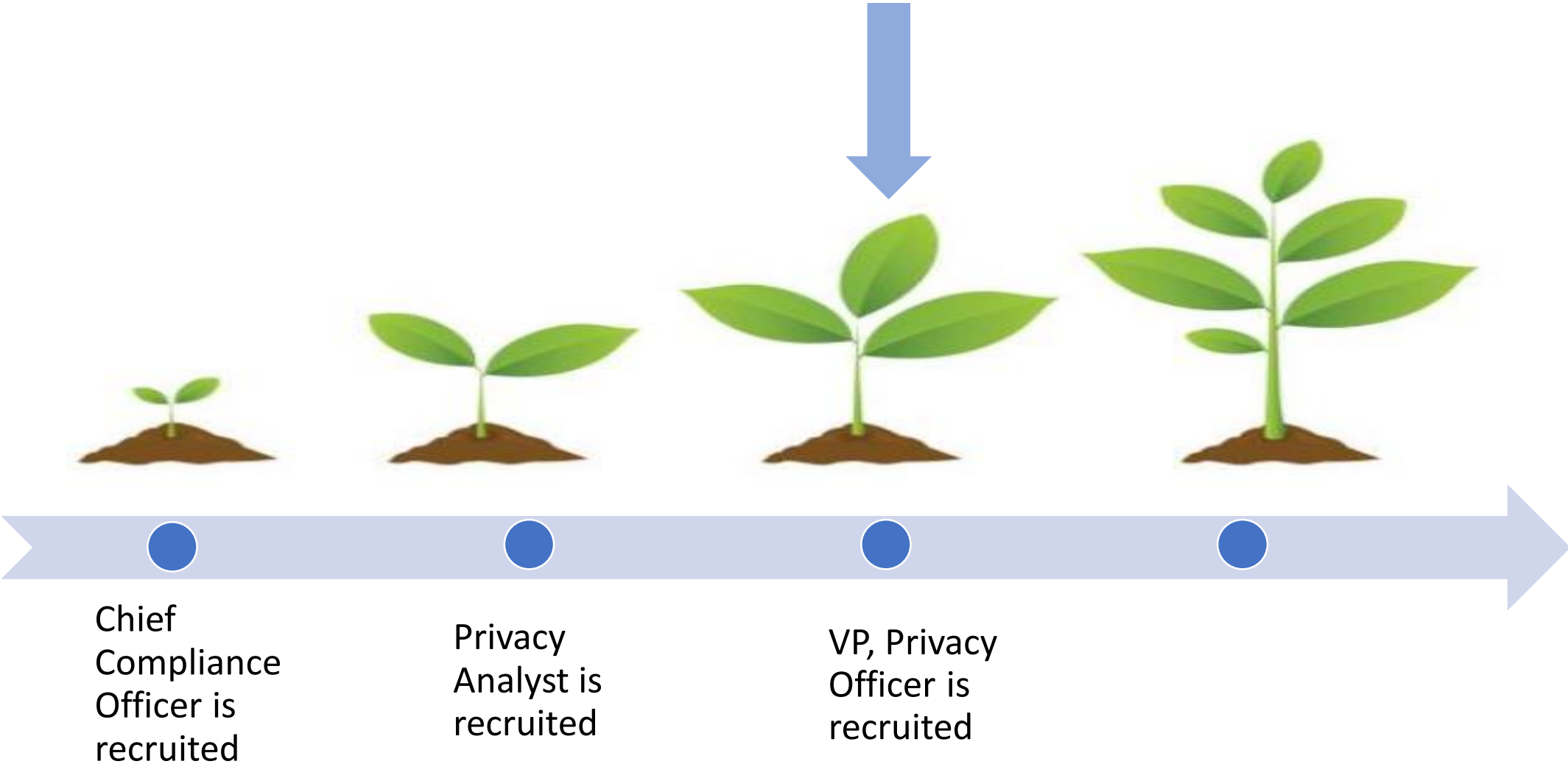


Do your employees know who the Privacy Officer is?



- Lack of Presence & Awareness
 - Minimal privacy training beyond annual mandatory
 - Mostly electronic
 - Not dynamic or interactive
 - Unknown effectiveness

The Growth of a Privacy Program



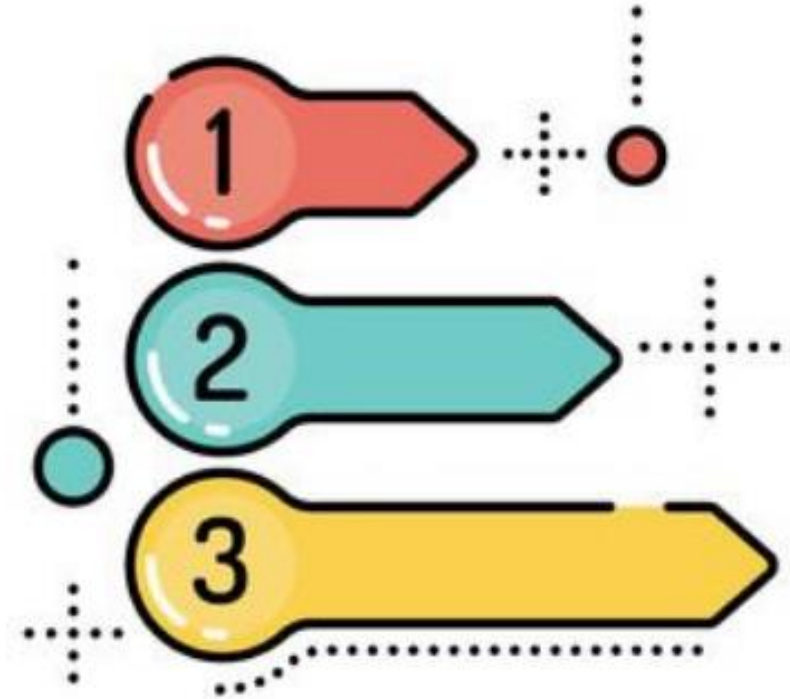
Getting Started

- Compliance culture of “We Come to You When We Need to...”
- Skepticism
- Challenge to get into rooms



Setting Priorities

- Incident management and response
- Socialization
- Real time assessment
- Risk assessment



Risk Assessment

- Internal Risk Assessment vs. External Party Risk Assessment
- Third Party Risk Assessment tool vs. Internal developed tool
- Institutional Buy In



Setbacks

- Existing processes incompatible with privacy program operations
- Inexperience with privacy regulatory matters and inquiries
- Failure to get access to key arenas
- Unanticipated “political” and “relationship” structures



Successes

- Developed positive relationships with key departments
 - Information Security, Health Information Management, Data Analytics
- Auditing and Monitoring Program
- Outreach and Education
- Increased Privacy Awareness

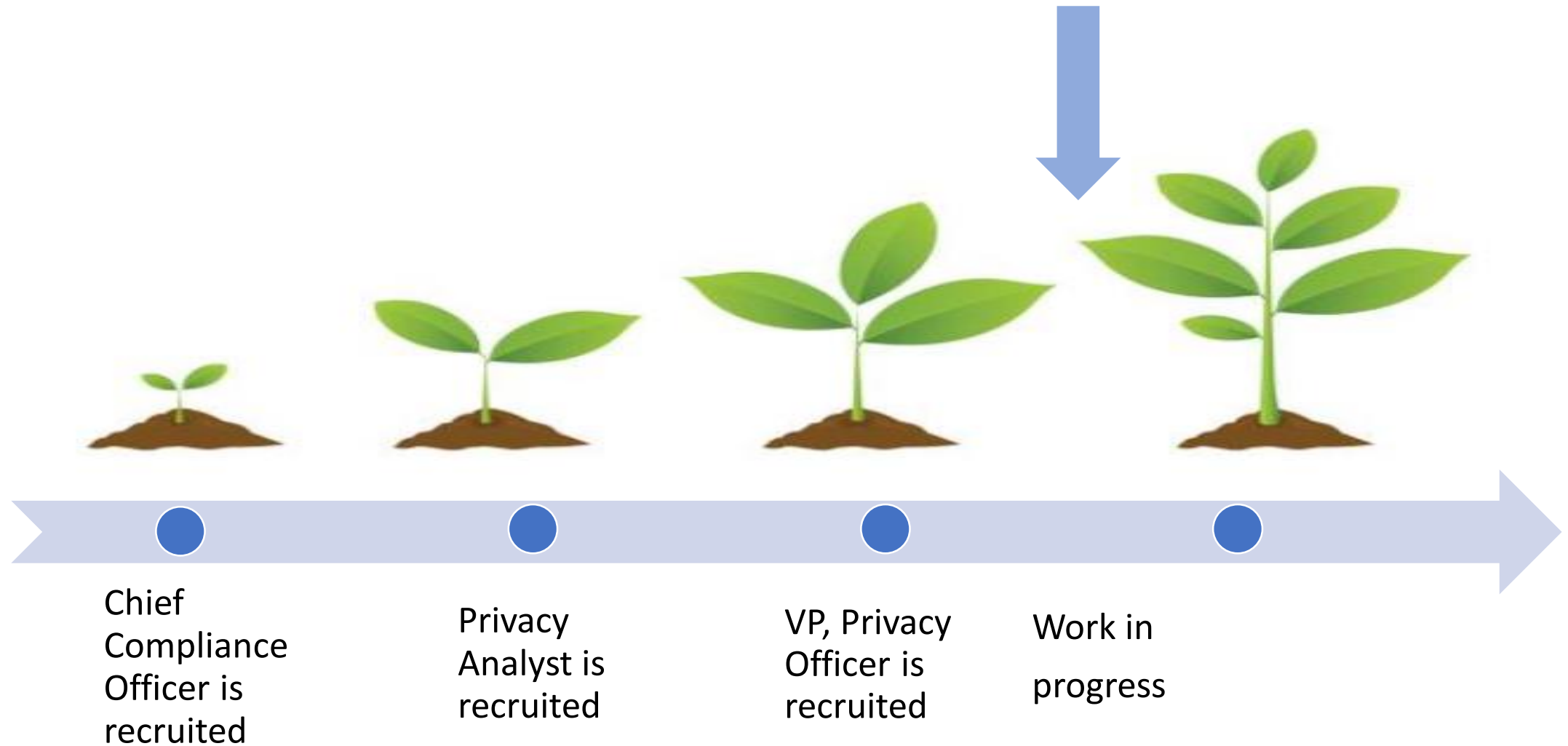


Lessons Learned

- Earlier identification of key departments
- Reliance on reported compliance
- Determining unknown organizational challenges
- Reliance on how it should be vs. what it is



The Growth of a Privacy Program



Focus Forward

- Increased Education and Awareness
- Increased surveillance
- Social media, photography and marketing
- Strengthening privacy program

