



*Privacy Project  
Framework &  
Structure*

*HIPAA Summit*

*Brent Saunders*

*202-414-1031*

*[brenton.saunders@us.pwcglobal.com](mailto:brenton.saunders@us.pwcglobal.com)*

# Philosophy and Approach to Privacy

Six key concepts drive the project philosophy:

- Primary focus on business drivers, secondary on regulatory drivers
- Privacy and security programs should be well coordinated (*information protection*)
- Good faith efforts and documentation are essential to demonstrate compliance
- Approach privacy as a series of manageable implementation projects
- Integrate privacy and security programs into existing organizational structure and reporting realities
- Partner compliance and business resources

The approach recognizes that, beyond legal and regulatory requirements, *information protection* is an emerging business imperative, whether it's employee, patients, members, clinical and/or corporate information

# An Approach – Implementing a Privacy Program

- Assessment vs. Implementation
- Projects should be developed by teams and refined with the business people/department to meet your organization's business needs, processes and environment
- An “implementation” approach can be broken down into the following phases:
  - Project Organization and Impact
  - Program and Project Structure Refinement
  - Detail Planning/Rollout
  - Implementation

# The 4 Phases

## Phase I – Project Organization

Set Expectations,  
Objectives, Approach

Organizational and  
Legal Analysis

Project Management  
Setup and Initiation

Privacy Laws and  
Regulations - Impact  
Analysis

Awareness Training  
(as needed)

## Phase II – Program and Project Structure Refinement

Goals & Strategic  
Direction

Document Review

Information  
Flow Analysis

Needs Assessment

Project Identification

## Phase III – Detail Planning and Rollout

Build Detailed Project  
Plans

Develop Integrated  
Project Plan

Assign Project  
Accountability

Finalize Project  
Management Structure

Launch Privacy & related  
Security Projects

## Phase IV – Implementation

Project Management

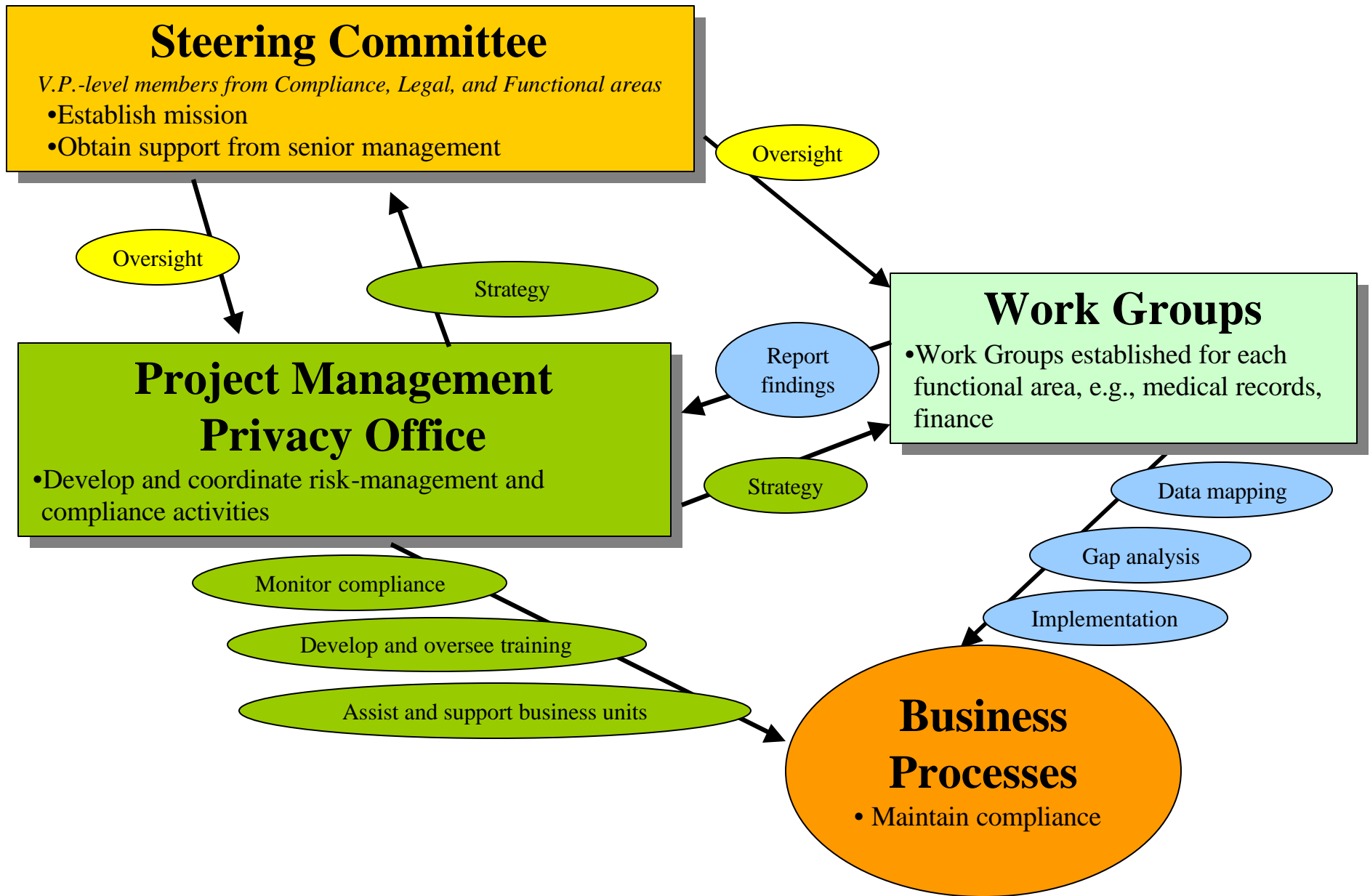
Ongoing Oversight  
(as needed)

Specific Project  
Assistance (as needed)

Progress Validation  
(as needed)

Compliance  
Maintenance

Project Management and Quality Assurance



# Ongoing Program Organization

- Compliance Model
- Hub and Spoke Model
- Privacy Committee Model
- Legal Model
- IT Model