

FRANCISCAN MISSIONARIES OF OUR LADY HEALTH SYSTEM

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From Silos to Synergy:  
Collaborating Across  
Departments to Provide  
Enterprise-wide System  
Protections and Ensure Patient  
Privacy and Security

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## Speakers



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# Agenda



1. Introduction to FMOLHS
2. Risk Assessment: Reaching across the aisle
3. Building Board Level Support to navigate an OCR Audit
4. Privacy, Compliance & Security Collaboration
5. "Safeguarding Our Ministry" – the organizational approach
6. Safeguards in practice – tools, processes, and shared services
7. How to create collaboration at your organization: Silos to Synergy
8. Q&A



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## Introduction to FMOLHS



<p>Catholic health system covering Louisiana and Mississippi</p>	<p>Founded in 1911</p>	<p>2,500 physicians</p>	<p>5 full-time Compliance Officers and 1 Compliance Specialist</p>
<p>8 hospitals</p>	<p>2,370 beds</p>	<p>17,716 team members</p>	<p>13 in IAM, 2 in GRC, and 6 in SecOps</p>



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## FMOLHS Privacy & Security Program



In 2020, compliance concerns alone drove **775 investigations**.



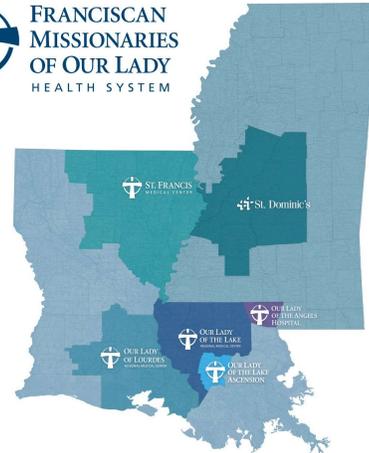
FMOLHS acquired St. Dominic's – Jackson, expanding into a new state and bringing new IT and groups to the table



FMOLHS leverages the **NIST cybersecurity framework**. Monitoring several compliance and security scenarios with a variety of tools.



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## The Risk Assessment: The Privacy & Security “A-Ha” Moment

- In early 2000, **FMOLHS** conducted an incident-driven Risk Assessment
- There was a disconnect across Information Security, Compliance, and the rest of IT
- This spurred compliance and security to get on the same page

Cybersecurity, IT advancement, and privacy issues result in breaches which bring remediation and fines for compliance

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## Building Board Level Support: Navigating the OCR Audit

- **FMOLHS** had to provide in-depth information to an outside entity
- Five different OCR document requests - and finding the right pieces was a challenge
- Collaboration was key in breaking down what was needed to the board

*This turned the conversation to “Tell us what Compliance and Security need”*

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## Security & Compliance Collaboration: Life in Each Others' Shoes

- After Security was brought back into IT and the OCR audit had begun...
- Compliance & InfoSec partnered to deliver information to the OCR, they would come back asking for more detail and to drill into that information
- This required continuous back-and-forth between the compliance and InfoSec groups to pull more detail and insights
- Britani & Elizabeth linked up and saw the day-to-day of each others' teams

Honesty and openness set the landscape for making a mutual effort

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## Safeguarding Our Ministry: The Organizational Approach

At the end of 2019, **FMOLHS** began their  
“Safeguarding Our Ministry” initiative



- Enterprise-wide effort across HR, compliance, legal, audit, privacy, and compliance that starts with presenting education topics each week on hot button items (e.g., phishing)
- In practice, Security conveys the importance of phishing awareness and prevention tools to compliance. Compliance drives the message home through education efforts.

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## Safeguarding Our Ministry: Tools Don't Solve Problems, People Do

1.

Identify your groups' strengths and weaknesses

- **Compliance** may be your policy and legal experts, but they might not have the toolkit to pull metrics, data, and insights needed to address them
- **Security** may provide or build tools to address those regulatory requirements, but lack context as to how those requirements will be evidenced or tested



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## Safeguarding Our Ministry: Tools Don't Solve Problems, People Do

2.

### Assign ownership based on functional expertise

- If **Compliance** are the regulatory and remediation experts, they will need to coordinate with the employee, HR, risk management, and Legal
- If **Security** are the technical and IT experts, they will need to operate those tools or provide solutions in business language that can be easily understood



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## Safeguarding Our Ministry: Tools Don't Solve Problems, People Do

3.

### Check each other and have open dialogue

- **Compliance** should be asking "Can we do this?" or "Why can't we do this?" or "How can we make this happen?"
- **Security** should be asking "Will this address your use case?" or "Why does this not address your use case?" or even be willing to offer alternatives



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## Safeguarding Our Ministry: In Practice – Phishing & Education



Keep Your Passwords to Yourself  
Information Security Starts With You

- InfoSec is running phishing campaigns
- Marketing design and brand education
- Risk management, Compliance, and InfoSec run education in tandem
- Instead of redoubling efforts, we are tackling both effectively

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## Safeguarding Our Ministry: In Practice – Patient Privacy Technology



Auditing technology across  
multiple EHR systems &  
Proactive Monitoring  
Services



Compliance runs enforced  
policies and follows up on  
alerts and investigations



Security will provide  
insights into what  
happened in the data in  
business terms

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## Silos to Synergy: Why are Compliance and Security Siloed?

- We are in different buildings.
- We don't speak the same language.
- We don't want to step on each others' toes.
- We don't have time to connect with the other group.
- We have our assignments from risk management, and they have theirs.

**All of the above are exactly WHY building a relationship across the groups is important**

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## Silos to Synergy: How to Build the Collaboration

- ✓ Get in the same room together (virtually)
- ✓ Find each others' common goals – for FMOLHS it is “safeguarding the ministry”
- ✓ Bring your mail to the right mailbox
- ✓ Understand each others' reporting structures and communicate up
- ✓ Build trust through transparency and honesty to gain an understanding
- ✓ Trust will allow openness on addressing weaknesses
- ✓ Identify your low-hanging fruit and prioritize them
- ✓ Create a plan that leverages each others' strengths to address gaps

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## Lessons Learned

- Privacy, Compliance, and Security are all on the same team with a common goal – sometimes you just have work to find common ground
- There are dozens of reasons why working across silos is difficult – use those to build the bridges to accomplish your goal
- Learn to speak each others' language or spend a day in each others' shoes
- Build the bridges before something happens – having familiarity and trust before disaster strikes will help remediate the fall-out
- Spend time practicing for when a real issue happens

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## Thank you for joining us



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## Contact Information



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