



FY25 WORK PLAN

COMPLIANCE & PRIVACY

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A NOTE FROM THE HIPAA COMPLIANCE & PRIVACY OFFICER

For FY25, the Compliance and Privacy Office (CAP) will remain steadfast in proactively addressing and adapting to evolving state, federal, and industry regulations, with a strong emphasis on Health Insurance Portability and Accountability Act (HIPAA) rules and requirements. Our focus will be on ensuring that our workforce is continually informed about legislative updates while developing, implementing, and maintaining comprehensive policies and procedures.

In FY24, the CAP Office made significant strides by improving our HIPAA Compliance Auditing Program tailored to meet the HIPAA Privacy Rule's mandates for internal auditing and monitoring. We successfully completed four detailed audits.

To ensure our documentation remains current and relevant, we undertook a thorough review and revision of our HIPAA policies and procedures. We also updated our annual HIPAA training program to reflect the latest regulatory changes. In addition to digital training modules, we conducted several in-person group training sessions and facilitated round-table discussions, where staff provided valuable feedback and suggestions. This interactive approach helped us address staff concerns more effectively and ensure that our training meets practical needs.

Our goal is to cultivate a culture of privacy within the County, emphasizing the critical role each employee plays in protecting our constituents' data. These initiatives described below are designed to enhance our organizational capabilities, engage our workforce, and ensure we are well-prepared for the challenges and opportunities of the upcoming year.

Monisha Perryman

HIPAA Compliance & Privacy Officer

THE PEOPLE OF CAP SHAPING OUR VISION



MISSION

To build a trusted and well-regarded Compliance and Privacy program where employees, customers, and constituents are treated with dignity and respect. Our program will equip users with the knowledge needed to protect and secure the County's privacy data through comprehensive training, clear policies, and effective procedures.

VISION

The Travis County CAP program will be recognized as one of the top compliance programs in Texas, exemplifying excellence in supporting the safety of people in the community and advancing the County's vision to be recognized as the best county in the US.

PRIMARY INITIATIVE

In today's increasingly digital and interconnected world, the need for robust privacy protections has never been more critical. As organizations handle vast amounts of personal and sensitive data, the importance of safeguarding this information from unauthorized access and misuse is paramount. To meet these growing challenges, we are launching an initiative aimed at transitioning to a full Privacy Office—an integrated, strategic function dedicated to overseeing privacy management across all facets of the County. This transition will not only strengthen our compliance with global data protection regulations but also build a culture of privacy that aligns with our commitment to transparency, trust, and accountability with our customers, partners, and stakeholders.

COMPREHENSIVE PRIVACY PROGRAM

To evolve the HIPAA compliance and privacy program into a comprehensive privacy program that supports all county divisions.

CORE PRIORITIES

In FY25, our HIPAA Compliance and Privacy Program will continue to prioritize strengthening administrative and physical safeguards to enhance the protection of sensitive health information.

- ◆ Administratively, we will focus on refining and updating our policies and procedures to align with the latest regulatory requirements and best practices.
- ◆ Physically, we will continue to work with both Information Security and the Office of Security & Protection to bolster facility access controls, workstation security, and equipment management to prevent unauthorized access and ensure the secure handling of PHI. Environmental safeguards will be reinforced to protect our physical and electronic records from potential threats.

SERVICES

Our services provide a range of services designed to ensure adherence to HIPAA regulations, protective sensitive health information, and manage risks:

- ◆ Privacy and Security Audits
- ◆ Training and Education
- ◆ Incident Response and Management
- ◆ Access Control and Management
- ◆ Policy Development and Maintenance
- ◆ Risk Assessment and Management
- ◆ Vendor and Business Associate Management

KEY INITIATIVES

UPGRADE PHYSICAL AND ADMINISTRATIVE SECURITY MEASURES

Implement and enhance physical and administrative safeguards to protect PHI. This includes upgrading physical security controls (e.g., access controls, surveillance, secure storage) and administrative measures (e.g., access management, incident response procedures). The initiative will focus on ensuring that all physical locations and administrative processes comply with HIPAA requirements and effectively safeguard sensitive information.

LAUNCH A MULTI-TIERED HIPAA TRAINING AND AWARENESS CAMPAIGN

Develop and implement a multi-tiered training program tailored to different roles within the County. This initiative will include initial training for new employees, role-specific training for those with access to PHI, and ongoing education to keep staff updated on the latest HIPAA regulations and best practices. The campaign will use interactive and scenario-based training to improve engagement and retention and will be evaluated through feedback and performance metrics.

BOLSTER LEADERSHIP ENGAGEMENT AND OVERSIGHT

The Travis County HIPAA Governance Committee, composed of key members with extensive knowledge of HIPAA regulations and organizational risk factors, will play a vital role in this initiative. We anticipate increased engagement from board members and a

more frequent meeting schedule to reinforce consistent compliance standards and effective oversight.

REVIEW ALL BUSINESS ASSOCIATE AGREEMENTS (BAAs)

This review is essential for ensuring comprehensive compliance in the management of HIPAA data shared by Travis County. Ensuring that business associates adhere to HIPAA requirements and contractual obligations helps mitigate the risk of data breaches and non-compliance, protecting both the organization and its patients.

RISKS & CONTINGENCY PLANS

Through the auditing and monitoring program, CAP has recognized two issues that hinders the success of its compliance program:

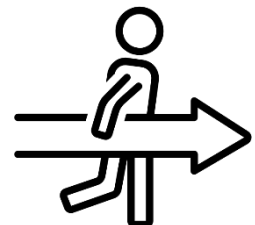
- Insufficient Training and Awareness - Through staff discussions, it has been determined that online, web-based training alone is insufficient. Staff have expressed a strong preference for additional training options, including one-on-one and in-person sessions. These formats will provide opportunities for direct interaction, allow participants to ask specific questions, and engage in interactive scenarios. To address this feedback, the HIPAA Compliance and Privacy Program will incorporate a variety of training methods, ensuring a more comprehensive and engaging professional development experience.
- Vendor and Business Associate Compliance - Monitoring Business Associates (BAs) for compliance is a critical component of a robust HIPAA Compliance and Privacy Program. Ensuring that BAs adhere to HIPAA requirements and contractual obligations helps mitigate the risk of data breaches and non-compliance, protecting both the organization and its patients. For FY25, the CAP Office will regularly review and update any changes in regulation or business operations. Before engaging with a new BA, an initial risk assessment will be performed to evaluate the vendor's data protection practices and historical compliance.

COLLABORATIONS & PARTNERSHIPS

The CAP Office partners and supports all the business units under the Hybrid Order. We collaborate and work together as a team to ensure that all protected health information is safe and secure.

LOOKING AHEAD

This year, advancing the efforts in HIPAA compliance with renewed dedication and transformative initiatives is aimed at enhancing the overall privacy and security practices. The HIPAA Compliance and Privacy Office strives for continuous improvement in all areas by regularly evaluating the effectiveness of the compliance program and implementing stakeholder feedback on the program's effectiveness.



For FY25, the CAP Office will continue its commitment to audit readiness through enhanced auditing and risk assessment efforts. Additional audits will be performed to further bolster compliance and address any newly identified issues. By providing these services, the Program can

ensure robust protection of PHI, adherence to regulatory requirements and effective management of privacy and security risk.

The focus remains on ensuring compliance by identifying and addressing potential vulnerabilities in the data collected and maintained by the County. This proactive stance reaffirms the dedication to protecting sensitive information and maintaining rigorous data security standards.