Health Insurance Portability and Accountability Act of 1996

Case Studies in HIPAA Compliance for Hospitals and Health Systems

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Providence Health System, Oregon Region - Service Areas

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Providence Health System - Oregon Region - Statistics

- **8 Hospitals**
- **Licensed Beds 1,474**
- **Active Medical Staff 1,964**
- **Inpatient Admissions 63,277**
- **Outpatient Visits 1,721,830**
- **Primary Care Visits 446,510**
- **Emergency Visits 170,111**
- **Employees 12,322**

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ORGANIZE

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Organizational Strategy Questions

- **Utilization of a project office?**
- **Utilization of a project methodology?**
- **Project manager?**
- **Organizational leadership structure.**
- **Complexity of your environment.**
- **What worked and what didn't work with Y2K project structure?**
- **What makes sense for your organization.**

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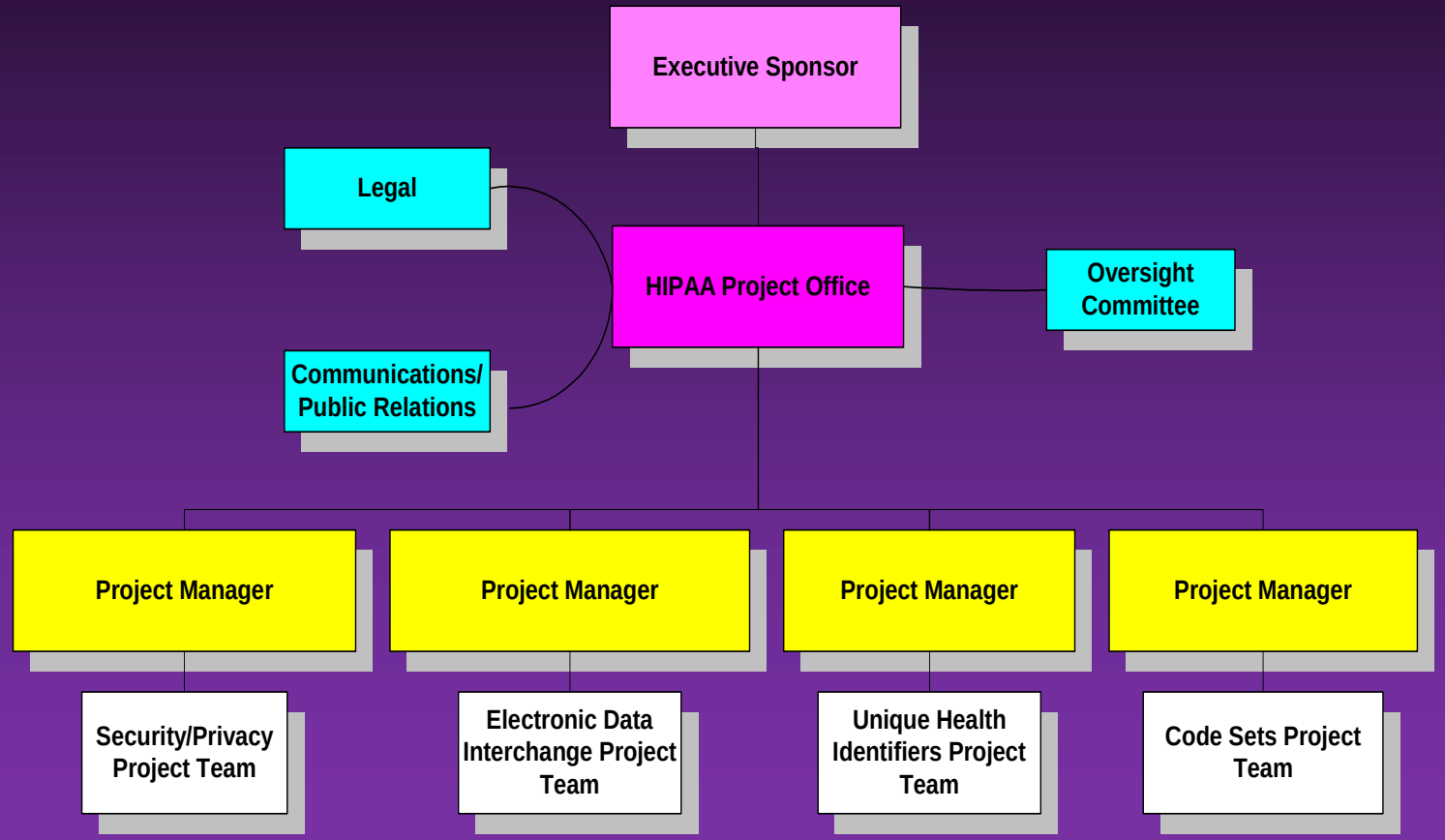
Providence HIPAA Organizational Structure



Organizational Structure

- **Executive Management Approval and Appointment of Sponsor**
  - **Rick Skinner, CIO - Oregon Region**
- **Executive Sponsor**
  - **Liaison to top executives and the Board**
  - **Review and approve overall HIPAA strategy**
  - **Political issue resolution**
  - **Budget**
  - **Continuous support**

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Organizational Structure

- **HIPAA Project Manager/Leader**
  - **Project responsibility for all HIPAA standards**
  - **Overall implementation strategy**
  - **Compliance strategy for all HIPAA standards**
  - **Communication strategy**
  - **Monitor compliance of business partners**
  - **Education of and general awareness of HIPAA**

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Organizational Structure

- **Sub-Project Manager**
  - **Identification of business practices impacted**
  - **Identification of systems impacted**
  - **Validate IT Asset Inventory**
  - **Impact analysis**
  - **Compliance strategy**
  - **Implementation strategy**
  - **Validation/Testing**
  - **Compliance sign-off**

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Organizational Structure

- **Project Team Members**
  - **Representation from across major Providence business units:**
    - **Hospital Operations**
    - **Clinic Operations**
    - **Home Services**
    - **Physicians**
    - **Shared Services (HR, Finance etc.)**
    - **Long Term Care**
    - **Legal**
- **Oversight/Steering Committee**

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Assessment and Analysis

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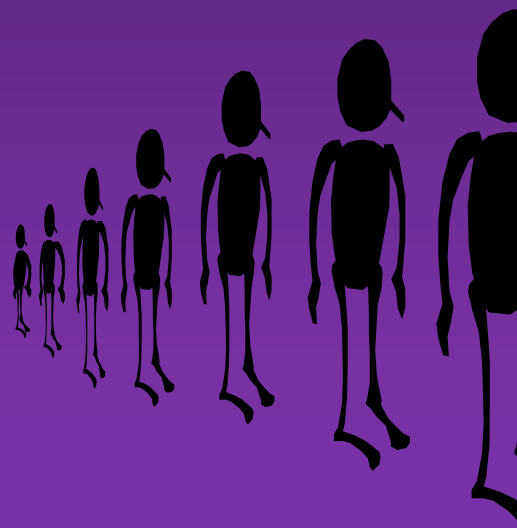
Assessment and Analysis

- **Risk Management Methodology**
  - **Organizational Assessment**
    - **Identify threats**
    - **Probability**
    - **Vulnerabilities**
    - **Mitigation**
  - **Departmental Assessment**
  - **System Compliance Surveys**
    - **HIPAA compliance specific questions regarding the standard**

Assessment and Analysis

- **IT Asset Inventory**
  - **Y2K Inventory as foundation**
  - **Asset Inventory:**
    - **Applications**
    - **Databases**
    - **Interfaces and File Transfers**
    - **Host and File Servers**
    - **BioMedical Devices**
  - **Process to maintain the inventory**



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Assessment and Analysis

- **Review of Access to Information Systems**
  - **Correct level of access**
  - **Confidentiality agreement signed**
  - **Improved process**
- **Data Mapping**
  - **Identification of healthcare information moving inside and outside of Providence**
    - **Chain of Trust Partner Agreement**

Assessment and Analysis

- **Contract Management**
- **Systems Not Supported by Regional IS**
  - **Compliance packet**
  - **Follow-up validation**

Implementation

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Implementation

- **Policy and Procedure Development**
  - **39 policies**
  - **38 procedures**
- **Information Security Awareness Training**
- **Vendor Information Collection Mailing**

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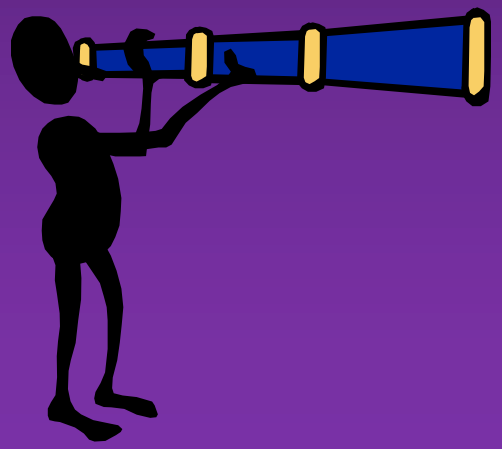
Sustain Compliance



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Sustaining Compliance

- **Strategy to Sustain Compliance**
  - **Integration of compliance into business strategy?**
  - **Integration of HIPAA with new initiatives**
  - **Evaluation of compliance?**
  - **Maintaining compliance?**
  - **Where does responsibility fall?**
  - **Who is responsible?**