Regional & State-wide Approaches to HIPAA Compliance

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"In contrast to Y2K,
to successfully implement HIPAA,
an organization cannot act alone."

David Kirby
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Director, Information Security Office, Duke University Health System

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Implementation Challenges

- "Cottage industry" with multiple standards and vendors
- Complexity of settings from IDS to private physician
- Shortage of resources (monetary and human)
- Competing priorities for resources
- "Will HIPAA happen?"

Why collaborate?

- Standards are dependant on consistent policies, practices and technology among business partners.

- Actions of a business partner may generate liabilities for one's own organization.

- Sloppy planning and inefficient implementation will be costly to everyone.

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State & Regional Approaches

- Implementation will occur locally.

- Healthcare crosses local political boundaries (i.e. across state lines)

- National coordination and guidance will be exceedingly helpful.

The healthcare industry's collaboration to successfully implement the mandated HIPAA Administrative Simplification Regulations.

www.wedi.org/snip

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The HIPAA Strategic National Implementation Process - SNIP

Vision

SNIP is a collaborative health care industry-wide process resulting in the implementation of standards and furthering the development and implementation of future standards.

Deliverables from WEDI SNIP?

- SNIP targeted deliverables include:
  - Forum for discussion of issues, decisions and rationale
  - Recommended sequence / schedule for implementation of the transactions and code sets
  - Formulation of recommendations for industry
  - Support for educational opportunities
  - Identification of security / privacy tools, techniques
  - Dissemination of best practice recommendations

North Carolina's Approach

- NCHICA is facilitating the planning among the following entities:
  - Providers
  - Health Plans
  - State Government
  - Local Government
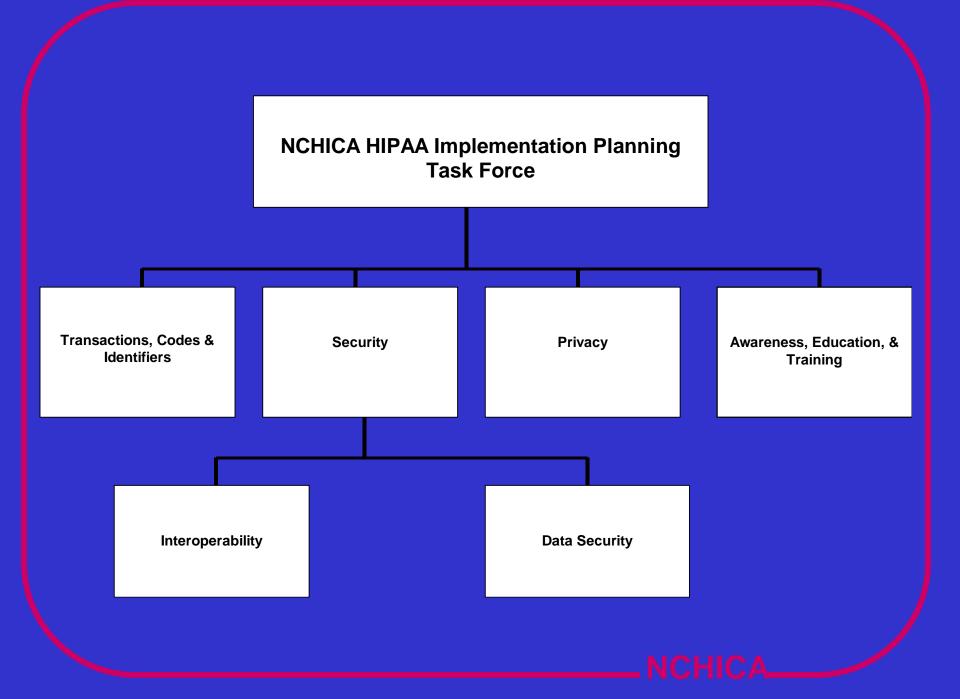 - Vendors
- Professional associations and societies playing a key role.

What is NCHICA ?

- 501(c)(3) - nonprofit research & education
- Formed by Gov.'s Executive Order in 1994
- 150+ members including:
  - Providers
  - Health Plans
  - Clearinghouses
  - Professional Groups
  - Research & Pharmaceutical
  - Government Agencies
  - Vendors
- Implement secure technology in healthcare

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                 │              Task Force               │
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   │Transactions,│   │             │   │             │   │   Awareness,    │
   │  Codes &    │   │  Security   │   │   Privacy   │   │  Education, &   │
   │ Identifiers │   │             │   │             │   │    Training     │
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     │ Interoperability│         │  Data Security  │
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NCHICA HIPAA Implementation Planning Task Force

Transactions, Codes & Identifiers

Security

Privacy

Awareness, Education, & Training

Interoperability

Data Security

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HIPAA Implementation Planning Task Force

- Goal:
  - Develop overall strategy for addressing HIPAA compliance in an <u>orderly</u> and most <u>efficient</u> manner possible.

- Coordinate activities of Work Groups:
  - Transactions, Codes and Identifiers
  - Data Security
  - Network Interoperability
  - Privacy
  - Awareness, Education and Training
- 100+ individuals from 50+ members

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Transactions, Codes and Identifiers Work Group

- Goals:
  - Develop consensus on sequence and timing for implementation of transactions & codes.

  - Issue and publicize NCHICA Target Date Guidelines

  - Build critical mass of providers, health plans, clearinghouses, vendors and gov't agencies.

- Recent Activities:

  - Preparing document for business partners.

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Network Interoperability Work Group

- Goals:
  - Understand HIPAA requirements for use of secure communications.

  - Develop method for qualifying and selecting vendors to ensure interoperability.

- Recent Activities:

  - Developing basis for secure transaction & interoperability among NCHICA members

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Privacy & Confidentiality Focus Group

- Goals:
  - Analyze final regulations when issued.
  - Develop map of differences between Privacy Regulations and existing state law.

- Past Activities:
  - Worked on privacy legislation since 1995
  - Analyzed and responded to HIPAA Proposed Privacy Regulations.

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Awareness, Education & Training Work Group

- Goals:
  - Survey degrees of readiness.
  - Develop programs to share HIPAA information.
  - Cooperate with professional groups and agencies to promote and deliver programs.
- Recent Activities:
  - Distributed first in series of survey instruments to determine state of awareness and readiness.
  - Planning underway for regional programs.

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Data Security Work Group

- Goal:
  - Develop self-assessment checklist / tool to determine organization's current level of HIPAA security compliance - gap analysis.

- Recent Activities:
  - Developed *HIPAA EarlyView™* self-assessment tool for gap analysis of proposed security regulation.
    - 521 Questions track proposed requirements.
  - Investigating Web site for state entities.

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Key Issues Raised :

- Effects of delays in issuance of final rules on timing and availability of resources.

- Concern about the cost of HIPAA implementation (especially Privacy regulations)

- Lack of resources ($'s and technical) for small and rural providers

- Disparity of opinion concerning under what circumstances to commit significant resources to comply with each part of the regs (i.e. Identifiers, Transactions/Codes, Security, Privacy)

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Additional Materials:

- **"Top Ten Planning Points for HIPAA Compliance"** (developed as briefing tool to obtain support from top management).

- **Task Force Organization Chart** (note balance in co-chairs with representation from providers, health plans, vendors and government agencies).

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