

Making the Most of HIPAA Compliance

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Transaction Data Set Standards

- Providers may finally be able get to the data they really want: electronic eligibility, authorizations and claims status on all payers
- The Dilemma - Classic EDI batch transactions versus Internet portals? Which vendors will survive?
 - Already seeing FREE Internet on-line inquiries!

Transaction Data Set Standards: Preparing for the 837 Format

- Providers may continue to submit by paper but aggressive use of electronic transactions will bring efficiency
- Track what our patient accounting and clearing house vendors are doing to prepare us and themselves

Transaction Data Set Standards: Preparing for the 837 Format

- Analyze the 72 new data elements in hospital claims for applicability, as many are “situational”
- Determine crosswalks between UB92 data and the required 837 data
 - Appendix F, National Electronic Data Interchange Guide, Healthcare Claim: Institutional ASC X12N 837 (004010X096)

Administrative Procedures:

Compliance Opportunities

- Information access controls and security configuration management
 - Appointment of Security and Assets Coordinator
 - Keep Y2K derived inventory of hardware and software current
 - Create database of systems and their password/ID methodology
 - Enforcement of standards for computer systems and the procurement process

Administrative Procedures:

Compliance Opportunities

- Governance by Corporate Compliance Committee - HIPAA sub-committee
- “Chain of Trust” partner agreements
 - Inventory and review all contracts involving data exchange, processing or storage
 - Office of CIO and Legal reviews and approves all contracts
 - Give third parties only the minimum data needed
 - Develop standard confidentiality clauses

Administrative Procedures:

Compliance Opportunities

- Training on security, confidentiality and data integrity
 - Education of executives, management and physicians help them understand why controls are needed
 - Opportunity for staff to enhance general knowledge of our systems and software programs
 - Reinforce security & confidentiality taught during orientation every year

Security and Data Integrity: Compliance Opportunities

- Technical network security met by a new state of the art data network with robust monitoring tools
 - High speed network capabilities
 - Remote monitoring of most layers of network infrastructure
 - Shorter time to diagnose problems and dispatch appropriate resources
 - Help Desk can see every device on the network, even seize control of a PC from their desk.

Security and Data Integrity: Compliance Opportunities

- Contingency plans met by building redundant network and server architecture
 - Maximum up time
 - Maximum through-put
- Physical controls for testing and revision
 - Change control methodologies applied to all systems and vendors
 - “Test” systems setup - no live system upgrades
 - Restricted/authenticated dial-in vendor access

Security and Data Integrity: Compliance Opportunities

- Authorization and authentication control
 - Automatic logoffs keep workstations from being tied up
 - “Single Sign-on” solutions are convenient for users, is it the answer to user compliance as well?
- Secured workstations
 - “Public PCs” with locked setup including no disk drive access
 - Network port alarms and disables if an unknown PC plugs in

Physician Internet Based Clinical System Access Issues

- HIPAA will help enforce unpopular issues
- Security concerns introduces new challenges
 - Secure Id cards or Biometrics for authentication
 - Encryption and network authentication without loading proprietary software on Physician's PC
 - Web servers need to be secured from rest of network
 - Security concerns about DSL, cable modems and other “tunneling” connections

Vendor Software Issues

- Most commercial systems do not have logs tracking user access by patient and field
- New concern over smaller, start-up vendors - will they be able to comply or will they fold up
- Vendors are already hurting - consolidations and product “sunsets” will be rampant

Vendor Software Issues

- Get up to date on current releases of software to be ready for HIPAA fixes/releases
- Put clauses in contracts now that state fixes to comply with HIPAA will be at no charge