

***The Evolution, Development &
Training of
HIPAA Policies and Procedures
in a Decentralized Health Care
Environment***

Presented By:

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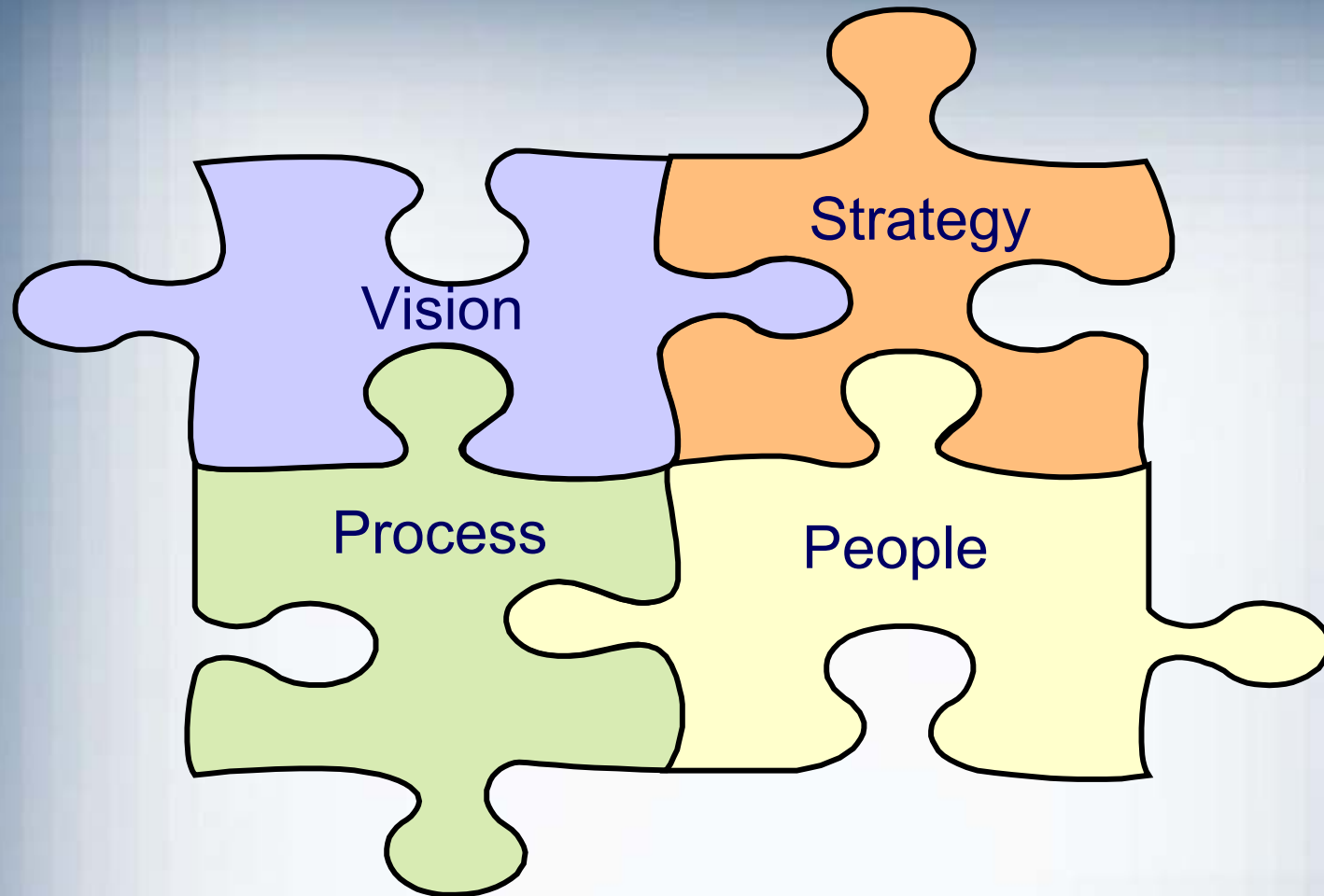
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Overview

- Understanding the puzzle
- Following the Vision
- Defining the terms
- Determining the strategy
- Enlisting the troops
- Defining the process
- Implementing the final product
- Rules to Live By

Accomplishing the Goal



Vision

- Develop HIPAA related Privacy and Security policies and procedures as required by the Regulation.
- Implement policies and procedures appropriate for your environment.

Strategy

- Understand your structure
 - Decentralized environment
- Identify Executive Sponsor to support the Vision
- Identify Key Stakeholders
- Define the scope
 - To which units will these policies apply?
 - Especially important in a Hybrid environment such as most academic medical centers.

Strategy in Motion

- Executive leadership
 - Chief Privacy/Security Officer
- Key Stakeholders
 - HIPAA Steering Committee
 - Composed of Sr. Leadership, Information Systems Directors, Physical Security Director, Office of General Counsel, Office of HIPAA Privacy and Security, Ethics, Human Resources

Decentralized Challenges

- Security Related Policies are especially a challenge in a multi-departmentalized IT structure
- Our approach encompassed developing over-arching policies and procedures as an umbrella/blanket to protect the covered entity
 - This is a global approach yet not intricately detailed.
 - It creates a minimum necessary type standard with which all areas must comply.

Policy

DEFINITION

- A definite course of action selected from alternatives to guide and determine present and future decisions.

- A high level overall plan embracing the general goals and acceptable procedures of a governing body.

Procedure

DEFINITION

- A particular way of accomplishing something
- A series of steps followed in a regular definite order
- An established way of doing things.

Source: Webster's Ninth Collegiate Dictionary, 1988

Benefits

- Improves Organizational Efficiencies
- Improves Operational Functioning
- Define appropriate behavior
- Communicate consensus and standardization
- Provide the foundation and a measurement tool for Human Resource action in response to inappropriate behavior.

“Understanding the environment, is key to identifying appropriate and effective policies and procedures.”

Policy Requirements

- Determine why a policy is needed
- Define what is covered by the policy
- Develop a standard template
- Identify contacts and responsibilities
- Determine how violations will be handled

The Development Process

Perform an inventory of current Policies & Procedures

Perform Gap/Risk Analysis to determine areas deficient in P&P's

Create a list of areas requiring P&P's

Design a standardized P & P format/template

Organize & categorize policy needs by Subject

Utilize organizational sources for Policy Development

Organize P & P's into a logical workflow

Write, Edit Review, & Compile all policy drafts into standard format for presentation.

Obtain consensus of the HIPAA Steering Committee

Revise & make any necessary changes

Present & Obtain leadership approval

Roll out P & P manual and provide training

Monitor & Update all P & P's as needed

“Begin with the end in mind.”

Policy & Procedure Tips

- Policies must be implementable
- Policies must be enforceable
- Policies must be concise
- Policies must be easy to understand
- Policies assist in balancing compliance with productivity.
- Policies & Procedures, especially related to the HIPAA Security Rule, should be tailored to the specific systems and operational areas.

People

- It is imperative to obtain input and solicit consensus of many areas within the organization when developing effective Policies and Procedures.
- Enlist the assistance of your HIPAA contacts throughout the Organization
- Train the contacts on the Policies and Procedures, their evolution and importance as they will carry the message to the masses.

People and Politics

- Remember:
 - People view policies as an obstacle to productivity because they serve as a tool to control behavior.
 - People are naturally resistant to control.
 - People are sometimes fearful of new policies.
 - Policies affect everyone no matter their role in the organization.

Living and Learning

- Garner leadership support
- Encourage Buy-in from Key Stakeholders
- Use HIPAA for Continuous Process Improvement
- Look at HIPAA in a positive realm and use it as a catalyst to effectuate change

Rules To Live By

- Institute policies/procedures with which your organization can comply.
- Policies & Procedures must be consistent with your business processes.
- Enforce accountability or benefits will be lost.

“Effective and appropriate policies and procedures are essential to achieving organizational efficiencies and protecting your organization’s assets, information, and reputation.”

Questions????

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