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HIPAA Security Summit

How Did We Get Here

What Were We Going to Accomplish?

Where Are We Now?

What's Next?

Roger May
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Agenda

- Challenges & Stimuli
- Summit Processes
- Summit Assets
- Participant Analysis
- Post-Summit Activities
- Current Status
- Go-Forward Plans
- Mini-Case Study
- Other Related Activities

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HIPAA Security

- Structured and Thorough
- Goal-Oriented
- Technology Agnostic
- Built to Cover the Issues
  - Not Defined for Specific Implementations
- Non-prescriptive
  - Requires Judgement
  - Subject to Interpretation
- But….. We will Need to Be Certified
  - Need Guidance!!!

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What Kind of Guidance?

- Reasonable
  - Can you live with it? Does it protect enough?
- “Implementable”
  - Can you put it into operation? Keep it there?
- Scalable
  - Dentists to Delivery Networks
- Business Oriented
  - How Do I fit it within my Business Processes?
- Where to Start???

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Use What's Available

- CPRI
- D.O.D. Rainbow Series
- ASC X12N
- Consulting and Technology Firms
  - Best Practices
  - Other Industries
- Business Continuity Firms / Experts

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Initial Event - October 1999

- Overview of HIPAA & Security Drill Down
- Reviewed Goals, Objectives, Methodology
  - Gathered Issues/ Concerns to Address
  - What are you worried about?
- Broke Into Tracks
    - Business Impact Analysis, Solution Design, Implementations, Monitoring and Reporting
    - Led by “Volunteers”
    - “Vendor-isms” were discouraged
- Report Back Progress
  - Ask, Refine, Encourage, Torture, Other
- Repeat Steps Above
- Close and Go to Next Phase

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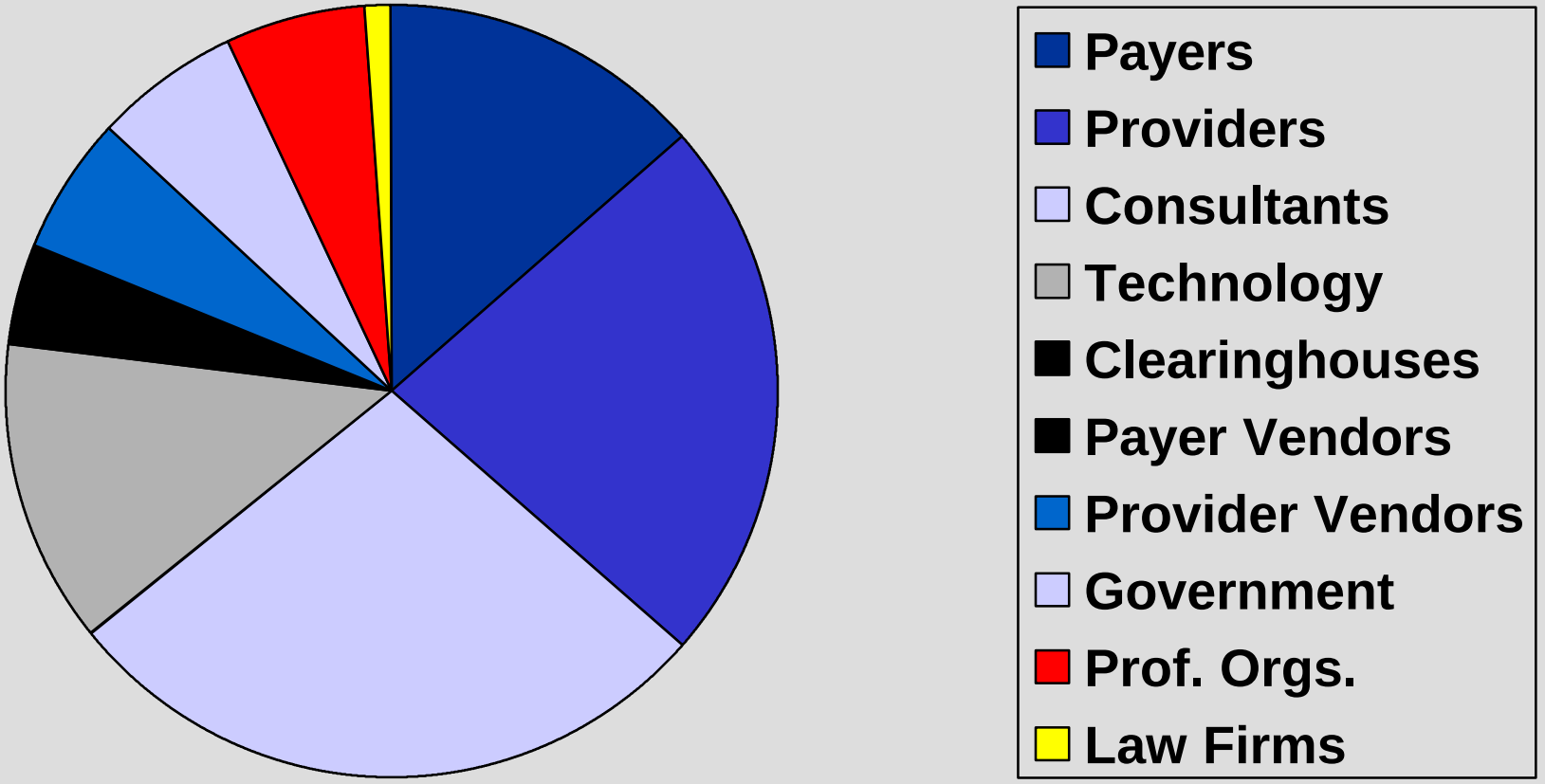
Cross Industry Contribution



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So, Where Are We Now?

- Compiled information and Available on
  www.smed.com/hipaa

  www.wedi.org/htdocs/resource/archive.htm
- Held Series of Conference Call and Face-to-Face Validation Sessions
- Rolled into WEDI SNIP Efforts on Security
  - Following Final Rules - Conduct Review Session and Update Findings

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What Were Some of the Issues

- Auditing - What, When, Who and For How Long
  - Audit User Activity - Intention is to track Fraud and Abuse
  - Log-on/Log-off & Function Level - Not at the detail level
  - Keep for Reasonable Time - Up to Organization to Determine
  - Who to Conduct Review? Frequency?

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What Were Some of the Issues

- Access Control
  - Policy
    - Do you have policies in place?
    - What does it cover?
    - Who manages it?
    - What happens when someone quits or is fired?
  - Technology - What does your system provide?
    - Role, User, Context
    - Single Sign-on, Biometric

An Example

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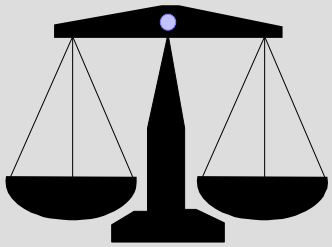
Universal Health Services, Inc.

HIPAA,

A Healthcare Operational View



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An Operational Approach

Identify Operational Task Forces

- Senior Management Leadership
- Information Technology / MIS
- Physical Plant / Facilities Mgmt.
- Health Information Management / MR
- Patient Accounting / Bus. Office
- Admissions / Reg / Scheduling
- Clinicians /Ancillary Services
- Legal/Risk Management
- Public Relations/ Marketing
- Compliance Office
- Human Resources
- Internal Audit

"Users are experts in their own areas - not HIPAA. You can teach HIPAA."

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An Operational Approach

- Incorporate Involvement from Different Levels (Department Head to Clerk / Staff)
- Involve Multiple Facilities (if applicable)
- Establish HIPAA Educational Program
  - Determine Organizational View of Compliance
  - Identify Areas of Impact / Significance
  - Provide Facility Specific Examples
  - Keep it Simple and Accessible
  - Initial and On-Going Education

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An Operational Approach

- Task Forces Review Areas and Document
  - Day to Day Operations
  - Areas of Exposure / Potential Exposure
  - Existing Policies & Procedures w/Recommended Changes
  - New Recommendations
  - Solutions Designed for Efficiency

Note - Compare Task Force Functions to Avoid Overlap (For Example - Which area should own insurance pre-verification - Business Office or Admissions?)

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An Operational Approach

- Task Force Recommendations to Central Oversight Committee for Review and Approval
  - Include Initial Compliance Approach
  - Document On-Going Monitoring Recommendations
  - Educational Programs
- Senior Management Review as Appropriate
- Communication to Other Facilities for Review and Comment (if applicable)
  - Drives Individual Ownership - Make it Theirs

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An Operational Approach

- Implement Changes in an On-Going Manner
  - No Need to Wait for “All”

    (For example - Volunteers need to sign confidentiality agreement.)
  - Keep it Simple
- Create Centralized Mechanism for Managing Comprehensive Documentation (Groupware)
- Incorporate w/Existing Compliance Initiatives

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Managing Challenges

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Managing Challenges

- Senior Management Education
  - Provide HIPAA Education with Real Examples of Compliance Exposure
  - Reference Business / Operational Impact - This is Not an IS Only Initiative
  - Identify Key Senior Management Sponsor to be on Corporate Oversight Committee
- Identify Potential Financial Expenditures
  - And Opportunities for ROI
- Incorporate Legal and Risk Management on Central Oversight Committee

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Managing Challenges

- Task Force Education Regarding HIPAA Requirements
- Organization's Specific Definition of What Represents Being Compliant
- Manage Transition with Business Associates
- Communicate with Personnel at All Levels
  - Anxiety Around HIPAA Required Changes
    - What is the impact on me and my department?
    - What additional work will I be required?
    - What liabilities exist?

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Miscellaneous Tips

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Miscellaneous Tips

- Read the Federal Register...
- Utilize Associated Industry Material as Reference
- Partner with Vendors
  - Create Ability to Influence Vendor Decisions

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Miscellaneous Tips - Go Through Systems Inventory

- Identify / Brainstorm Issues Based Upon ‘Type’ of Application
  - Medical Records - Known dependence on physicians = ease of access requirements, quick security process
  - Medical Records - Frequently shared outside hospital:

    chart copies, birth records = potential exposure
- Identify Any Issues Based Upon Vendor
  - Vendor HIPAA communication
  - Known issues with previous regulatory compliance efforts
  - Vendor longevity / stability
- Streamline and Standardize

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Summary

- It is Coming
- Word on the Street on Rules
  - No Big Surprises
- Tools are Available
  - Refinements Coming
- Practical Experiences are Underway
  - Stay Tuned for Case Studies
- Let us Know if We Can Help

Other Resources

- WEDI SNIP Security & Privacy White Papers - www.wedi.org/snip
  - Regional SNIP
- EarlyView - www.nchica.org
- CPRI-HOST Toolkit - Security Assistant
- Education via HIPAA University
- Countdown to Compliance - Transcripts & Audio

  www.smed.com/hipaa

Questions?