SNIP Regional Efforts

Keys to Achieving HIPAA Compliance

SNIP Regional Efforts Group

◆ Creation of the HIPAA Regional Efforts
  Group under the Education Committee

   – Defined charge, goals, deliverables

◆ Initial Identification of Regional Efforts

   – At SNIP Meeting in September, 2000

   – Over 20 States and Regions identified

SNIP Regional Efforts Group

- **Purpose**: Develop and maintain contact lists, start-up information and on-going communications in support of regional implementation efforts and activities.

- **Scope**:   Establish and maintain communication with regional HIPAA implementation efforts and to foster development of regional groups where none currently exist.

HIPAA Implementation Issues

- Health care is a "cottage industry" with multiple standards and vendors
- Complexity of settings from IDS to private physician practices
- Shortage of resources ($'s and human)
- Competing priorities for resources
- Implementation will occur locally

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Why collaborate?

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

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

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

How to Start a Regional Effort

- Establish organizing group
- Define mission and objectives
    - Education
    - Planning and Testing
    - Implementation Coordination
- Identify and Involve all key constituents:
    - Providers
    - Public and Private Payers
    - Vendors (clearinghouses, practice management vendors, etc.)
    - Employers
    - Professional groups

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How to Start a Regional Effort

- Organize into working committees

- Identify early adopters

- Prioritize work

  - Start with simple, initial deliverables (i.e. standard checklists for security and privacy)

- Coordination, Coordination, Coordination

- Think Nationally, Act Locally!

Key Elements for Collaborative Environment

◆ **Trust**

◆ **Commitment**

◆ **Clear Vision**

Trust

- Joint ownership

- Joint accountability

- No dominant player

- Balanced interests

- No hidden agendas

- Neutral meeting ground

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Commitment

- Leadership and support from top governmental officials (Governor & Secretary of HHS)

- Academic medical centers and key hospitals

- Leading health plans / insurers

- Professional societies & associations

- Key vendors

Essential Allies & Participants

- Medical Society

- Nurses Association

- Health Information Management Assn.

- Association of Local Health Directors

- Hospital Association

- Association of Pharmacists

- Long-term Care Association

- Association of Health Plans

- Vendors

Clear Vision

- Use HIPAA as an opportunity to re-engineer healthcare to make it more responsive and efficient.

- Keep the health of the individual as the core objective.

- Improve delivery and efficiency of healthcare through information technology and secure communications.

Initial Steps

- Leadership commitments from key players (e.g., financial commitments + in-kind support such as human resources, equipment, services, etc.).

- Government commitment to examine current state laws and regulations and work for appropriate changes.

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SNIP Regional Efforts Group

Case Example: North Carolina

HIPAA Implementation Planning Task Force

◆ **<u>Goal:</u>**

– Develop overall strategy for addressing HIPAA compliance in an orderly and most efficient manner possible.

◆ **<u>Coordinate activities of Work Groups:</u>**

– Transactions, Codes & Identifiers

– Data Security

– Network Security & Interoperability

– Privacy

– Awareness, Education & Training

HIPAA Implementation Planning Task Force
Dave Kirby (DUHS), Harry Reynolds (BCBS)

Transactions Codes and Identifiers
Stacey Barber (EDS)
Pete DePietro (BCBSNC)
Roger McKinney(Carolinas Health System)

Awareness,Education, and Training
Steve Wagner (NC MGMA)
Linda Goodwin (DUHS)
Katherine McGinnis (Eastern AHEC)

Privacy
Carmen Hooker Buell (NC DHHS)
Jean Foster (PCMH)

Security
Mike Serozi (BCBSNC)
Rosemary Abell (Keane)

**Consent & Patient Rights
Contracts
Minimum Necessary Disclosure
Minors' Issues
Research
State Law**

**Network Security & Interoperability
Data Security**

Transactions, Codes and Identifiers Work Group

- **Co-chairs:**
  - Pete DiPietro, BCBSNC
  - Stacey Barber, EDS
  - Roger McKinney, Carolinas Health Care System
- **Goals:**
  - Develop consensus on sequence of ANSI standard transactions.
  - Issue and publicize NCHICA Target Date Guidelines
  - Build critical mass of providers, health plans, clearinghouses, vendors and government agencies.
- **Recent Activities:**
  - Sequencing and scheduling updated and vetted with SNIP.
  - Discovery of NDC vs. J-codes issue for drug billing.
- **Upcoming:**
  - Developing position on NDC standard for hospital pharmacies.
  - 3/01- Review implementation schedule

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Security: Data Security

- **Co-chairs:**
  - Rosemary Abell, Keane
  - Susan Brown Ward, NC DHHS
  - Joe Christopher, Sampson Regional Health System
- **Goal:** Assist members in working with the HIPAA Security Regulations
- **Recent Activities:**
  - Development of *HIPAA EarlyView^{TM}* tool now used widely (46 states).
  - Currently developing *HIPAA EarlyView^{TM} Version 2.0*
- **Upcoming:**
  - **Tool Update** – Once the Security regs are final (expected 1 CQ01)
  - **Education and Training** – on *HIPAA EarlyView^{TM}*, collaboration with AET work group on model training
  - **Policies and Procedures** - develop minimum standard policies and procedure documents that could be used as templates.

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Security: Network Security & Interoperability Work Group

◆ **Co-chairs**:
- Mike Serozi (BCBSNC)
- Harold Frohman (Raytheon)
- Dave McKelvey (Duke University Health System)

◆ **Goals**:
- Understand HIPAA requirements for use of secure and interoperable communications.

◆ **Recent Activities:**
- Developing plan that will be the basis for secure transaction interoperability among NCHICA members

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Privacy & Confidentiality Focus Group

◆ **<u>Co-Chairs</u>:**

– Carmen Hooker Buell, NC DHHS

– Jean Foster, Pitt County Memorial Hospital

– Judy Beach, Quintiles

◆ **<u>Goal</u>:**

– To assist members in responding to the final Privacy regulations

◆ **<u>Recent Activities:</u>**

– Organizational meeting on January 8, 2001

◆ **<u>Upcoming:</u>**

– Work delivered by six work groups (detailed in following slides)

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Privacy: Consent & Patient Rights Work Group

- **Chair:**
  - Mary Beth Johnston, Womble Carlyle Sandridge & Rice

- **Goals:**
  - To provide a comprehensive framework and practical tools for the education and implementation of the portions of HIPAA dealing with consents and patients' rights as they affect covered entities and other persons.

- **Deliverables:**
  - Education.
  - Model consent forms.
  - Form policy related to covered entities notice of information practices.
  - A list of record keeping requirements.

Privacy: Contracts Work Group

- ## Co-chairs:
  - Sissy Holloman, UNC
  - Dick Lupo, Alston Bird

- ## Goals:
  - Provide model agreements that will address confidentiality and privacy concerns raised by HIPAA.

- ## Deliverables:
  - Model Business Associate Agreement containing Chain of Trust Provisions.
  - A separate basic prototype provision which can be inserted into existing agreements.

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Privacy: Minimum Necessary Disclosure Work Group

◆ **Chair:**

– Bob Lower, Alston Bird

◆ **Goal:**

– To develop a set of "Best Practice" guidelines for Covered Entities with respect to their routine uses of PHI.

◆ **Deliverables:**

– Overview of healthcare industry relationships affected by HIPAA.

– Catalog of routine uses by Covered Entity and type of relationship.

– Set of "Best Practices" for routine uses and disclosures identified.

Privacy: Research Work Group

- **Co-Chairs:**
  - Judy Beach, Quintiles
  - Doc Muhlbaier, Duke University Medical Center

- **Goal:**
  - To review and analyze the final privacy regulation with respect to provisions relating to research.

- **Deliverables:**
  - Develop standard language for informed consents for human subjects in research in accordance with the final privacy rule.
  - Document summarizing requirements for IRBs and internal privacy boards for protection of patient / subject privacy, including waivers and new questions not already in the Common Rule.
  - GAP Analysis White Paper of the final rule compared with the proposed rule and with other applicable regulations.
  - Develop recommendations for training modules for clinical investigators re privacy issues.
  - Document summarizing deidentification.

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Privacy: State Law Work Group

◆ **<u>Co-Chairs:</u>**

- Katherine White, NC Office of Information Technology Services
- Jill Moore, Institute of Government
- Carmen Hooker Buell, NC DHHS

◆ **<u>Goal:</u>**

- Identify existing state laws relating to health care information and analyze them in relation with the HIPAA privacy regulations.

◆ **<u>Deliverables:</u>**

- A document that presents the results of the research in a straightforward, workable format.

Awareness, Education & Training Work Group

◆ **Co-chairs:**
- Steve Wagner, NC Medical Group Managers Association
- Linda Goodwin, Duke University School of Nursing
- Katherine McGinnis, Eastern AHEC

◆ **Goal:**
- Share HIPAA information in cooperation with professional societies and associations to staff, promote and carry out the events.

◆ **Recent Activities:**
- Awareness sessions held around the state with over 1200 participants
- HIPAA Awareness survey (7200 NC facilities)

◆ **Upcoming:**
- Train-the-Trainer Sessions with AHEC
- Develop Case Studies
- Consider co-sponsoring or promote/endorse other groups' events
- Web-based HIPAA awareness presentations
- Redesign of NCHICA web site for HIPAA resources
- Potential Public TV presentation/s

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Recent Issues Raised in the Implementation Task Force

◆ Need to address HIPAA business impact.

◆ Distribution of "in-kind" commitment among NCHICA members.

◆ Readiness of supporting vendors to deliver systems in time for installation and testing.

SNIP Regional Efforts Group

Progress Report

SNIP Regional Efforts Group

◆ Establishment of a Catalogue of State/ Regional efforts

- Over 30 efforts now identified

- Included in SNIP's Web Site

◆ Development of Presentation Materials to Assist Local Efforts Get Started

SNIP Regional Efforts Group

Provided direct assistance (i.e. speaking engagements, conference calls, etc) in the formation of local efforts including:

- North Dakota
- New York
- Montana
- Missouri
- Virginia
- New Mexico

- Pennsylvania
- West Virginia
- Texas
- Etc.

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Thanks!

Q & A

List of Regional Efforts (1)
(January, 2001)

Arizona:
- – Name:
- – Contact: Kristin Rosati, Arizona Hospital Association, (602) 445-4300

California (1):
- – Name: SO CA HIPAA Forum
- – Contact: Christine Haynes, (818) 662-4700

California (2):
- – Name: California Information Exchange - CALINX
- – Contact: http://www.calinx.com

Arizona/California:
- – Name:
- – Contact: Carol Thompson, CBSI, (562) 590-2367, CThomps1@cbsinc.com

List of Regional Efforts (2)
(January, 2001)

Colorado:
- Name: Colorado SNIP
- Contact: Steve Lazarus (303) 488-9911 sslazarus@aol.com
- Contact: Michael Boyson (720) 489-1630 michael.boyson@chhn.com

Connecticut:
- Name: CHIME
- Contact: Becky Roberts, Connecticut Hospital Association, (203) 294-7306, e-mail: roberts@chime.org, http://www.chime.org

Florida (Central):
- Name:
- Contact: Lynda Long, Orlando Regional Healthcare, (407) 841-5111 ext. 32045, LYNDAL@orhs.org

List of Regional Efforts (3)
(January, 2001)

Georgia:

- Name: Southern HIPAA Administrative Regional Process - SHARP Covering HCFA District 4 (NC, SC, GA, FL, MS, TN, AL)
- Contact: Walt Culbertson, FutureSoft, WaltCulbertson@aol.com
- Contact: Gil Silva, HRSA, gsilva@hrsa.gov
- Contact: Cathy Benoit, HCFA, CBenoit@hcfa.gov

Hawaii:

- Name: Hawaii Health Information Corporation - HHIC
- Contact: Susan Forbes, (808) 534-0288, sforbes@hhic.org, http://www.hhic.org

Indiana:

- Name:
- Contact: John Kansky, marchFIRST Consulting, (317) 814-8376, john.kansky@marchFIRST.com

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List of Regional Efforts (4)
(January, 2001)

Massachusetts:

- Name: Massachusetts Health Data Consortium - MHDC
- Contact: Elliot Stone, (781) 890-6040, estone@mahealthdata.org, http://www.mahealthdata.org

Minnesota:

- Name: Minnesota Center for Healthcare Electronic Commerce - MCHEC
- Contact: Walter Suarez, MHDI, (651) 917-6700, walter.suarez@mhdi.org http://www.mhdi.org/mchec

Missouri:

- Name: Missouri SNIP
- Contact: Sandy Weiler, J. Norman Consulting, Inc.,

  (314) 576-4300, sweiler@jnci.com,

  http://www.jnci.com/mosnip

List of Regional Efforts (5)
(January, 2001)

Montana:

- Name: Montana SNIP
- Contact: Lisa Doyle, Birch & Davis, LDoyle@birchdavis.com

Nebraska:

- Name:
- Contact: Dan Gartin, Health Data Management Corporation, (402) 965-9546 (x123), dgartin@hdmcorp.com

Nevada (AZ and NM):

- Name: Southwest HIPAA Implementation Group
- Contact: Karen Weber kweber7@ibm.net

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List of Regional Efforts (6)
(January, 2001)

New Hampshire:
- Name:
- Contact: Joe Bergman, New Hampshire Department of Health and Human Services, JBergman@dhhs.state.nh.us

New Jersey:
- Name: Health Information Networks and Technology Project - HINT
- Contact: Mark Gordon (609) 984-1112 mgordon@tesc.edu

New Mexico:
- Name:
- Contact: Ralph Whiteaker, St. Joseph's Healthcare, (505) 727-4539, ralphw@sjhs.org

List of Regional Efforts (7)
(January, 2001)

New York:
- Name: New York Healthcare Electronic Commerce Users Group NYHUG
- Contact: Robert Davis, New York Department of Health, (518) 473-8144 rad01@health.state.ny.us
- Contact: Suzan Ryder, Empire Medicare Services, <sryder@empirebcbs.com>

New England:
- Name: New England States Consortium (NH, VT, RI, CT, MA, ME)
- Contact Joe Bergman, New Hampshire Department of Health and Human Services, JBergman@dhhs.state.nh.us

North Carolina:
- Name: NC Health Information and Communications Alliance - NCHICA
- Contact: Holt Anderson, (919) 558-9258, holt@nchica.org, http://www.nchica.org

List of Regional Efforts (8)
(January, 2001)

North Dakota:

- Name: North Dakota HIPAA Consortium
- Contact: Jennifer Kunz, ND Department of Human Services, (701)328-1721, sokunj@state.nd.us

Ohio:

- Name:
- Contact: Nancy Pekkanen Gillette, JD, Ohio State Medical Association, (614) 527-6762, gillette@osma.org

Oregon:

- Name: Oregon HIPAA Forum
- Contact: Paul Frisch, Oregon Medical Association, pfrisch@OrMedAssoc.org
- Contact: John R. Christiansen, (206) 386-7520, jrchristiansen@stoel.com

List of Regional Efforts (9)
(January, 2001)

Pennsylvania:
- – Name: E-Pennsylvania Alliance, 4750 Lindle Road Harrisburg, PA 17111
- – Contact: Marlowe Froke, e-Pennsylvania Alliance, (814) 466-6835, mdf2@psu.edu
- – Contact: Martin Ciccocioppo, The Hospital & Healthsystem Association of Pennsylvania, (717) 561-5363, martinc@hap2000.org

Texas (1):
- – Name: TBD
- – Contact: Viola L. Hebert, The University of Texas M. D. Anderson Cancer Center 713.745.4514 vhebert@mail.mdanderson.org
- – Contact: Akin Ogunrinade, Texas Department Of Health, (512) 794-6857, akin.ogunrinade@tdh.state.tx.us

Texas (2): (Central/Eastern)
- – Name: TBC
- – Contact: Kara Gerace, LifeCare Management Services (214) 525-0614, karag@lifecare-hospitals.com

List of Regional Efforts (10)

(January, 2001)

Virginia:
- Name:
- Contact: Ruth Tucci-Kaufhold, UNISYS Corporation, (804) 346-1138, ruth.tucci-kaufhold@unisys.com
- Contact: Joseph Schein, Compass Technology Management, LLC, (757) 233-7315, Joseph.Schein@compass.net

Utah:
- Name: Utah Health Information Network - UHIN
- Contact: Bart Killian/Jan Root (801) 466-7705, janroot.uhin.com http://www.uhin.com

Washington:
- Name: Community Health Information Technology Alliance - CHITA
- Contact: Elizabeth Ward, Foundation for Health Care Quality, (206) 682-2811 ext. 17, eward@qualityhealth.org, http://www.chita.org

Examples of Regional Efforts

◆ **Minnesota:**
  - Convener: Minnesota Center for Healthcare Electronic Commerce
  - Structure: multi-organizational public-private collaborative effort established in 1994
  - HIPAA Focus: Education seminars; dissemination of information; working groups looking at transaction implementation, security and privacy.
  - Special projects: Coordinated transaction implementation (CQS); Network Implementation (MedNet); implementation of security systems (HealthKey MN)
  - Website: www.mhdi.org

Examples of Regional Efforts

◆ **Massachusetts**:

- ◆ Convener: Massachusetts Health Data Consortium, a non-profit organization established in 1978
- ◆ Structure: multi-organizational public-private collaborative effort
- ◆ HIPAA Focus: Education seminars; dissemination of information; working groups looking at transaction implementation, security and privacy.
- ◆ Special projects: Coordinated transaction implementation (NEHEN); implementation of security systems (Secure Messaging Project)
- ◆ Website: www.mahealthdata.org

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Examples of Regional Efforts

- ## North Carolina:
  - Convener: NC Healthcare Information & Communications Alliance, a non-profit est. in 1994
  - Structure: multi-organizational public-private collaborative effort
  - HIPAA Focus: Work Groups planning: sequencing of implementation of transactions, codes and data elements; development of security self assessment tools, analysis and publication of most stringent privacy regulations (Federal vs state); development of strategy for network security & interoperability,; and carrying out awareness, education & training workshops
  - Website: www.nchica.org

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Examples of Regional Efforts

- ## Utah:
    - Convener: Utah Health Information Network, a non-profit organization established in 1992
    - Structure: multi-organizational public-private collaborative effort
    - HIPAA Focus: Transaction implementation; several working groups looking at each transaction; also working on security
    - Special projects: UHIN operates a centralized secure information clearinghouse for health care transactions; implementation of security systems (HealthKey)
    - Website: www.uhin.com

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HIPAA-Related Resources

- HIPAA Law: *http://aspe.os.dhhs.gov/admnsimp/pl104191.htm*
- DHHS: *http://aspe.os.dhhs.gov/admnsimp/*
- National Committee on Vital and Health Statistics *http://www.ncvhs.hhs.gov/*
- HCFA: *http://www.hcfa.gov/medicare/edi/edi.htm/*
- Health Privacy Project: *http://www.healthprivacy.org/*
- Privacy, Public Health, and Health Research: *http://aspe.os.dhhs.gov/admnsimp/PHR.htm*
- Data Interchange Standards Association (DISA): *http://www.disa.org*
- Washington Publishing Company: *http://www.wpc-edi.com*
- WEDI: *http://www.wedi.org/*

HIPAA-Related Resources

- National Uniform Claims Committee: *http://www.nucc.org*
- National Uniform Billing Committee: *http://www.nubc.org*
- ANSI ASC X12N: *http://www.x12.org/*
- National Council for Prescription Drug Programs *http://www.ncpdp.org*
- Health Level Seven (HL7) *http://www.hl7.org*
- Public Health Data Standards Consortium: *http://www.cdc.gov/nchs/otheract/phdsc/phdsc.htm*
- American Dental Association *http://www.ada.org*

SNIP Regional HIPAA Efforts Group

- **Process**:
  - Identify and document regional efforts
  - Use SNIP web site as information channel
  - Invite organizations to participate in information sharing 'meetings' (via listservs, teleconferences, and other means)
  - Prepare and disseminate information about "How to Start a Regional HIPAA Effort"
  - Document and share experiences of regional efforts in the areas of awareness and education, assessment, planning, testing, and implementation

SNIP Regional Efforts Group

- **Responsibilities**:
  - Develop a complete list of regional groups dealing with HIPAA implementation
  - Identify contact persons for regional groups working on HIPAA implementation
  - Encourage representation and participation in the SNIP national effort by these groups
  - Publish a listing of regional groups on the SNIP website including contact information for each group (perhaps by means of a map with links to regional groups' websites)

SNIP Regional Efforts Group

- **<u>Responsibilities</u>**: (cont.)
    - Determine areas lacking regional groups and encouraging the formation of regional groups in these areas
    - Develop a resource list for those interested in forming a regional implementation group
    - Solicit and post on the SNIP website content materials from regional groups in order to assist groups seeking to establish regional efforts

SNIP Regional Efforts Group

◆ **Responsibilities**: (cont.)

- ◆ Create via the SNIP website a communication channel with regional groups to share SNIP issues and seek regional input and consensus in regard to issues and solutions

- ◆ Develop a consistent message to assist those speaking about regional efforts on behalf of SNIP

How You Can Get Involved

◆ **SNIP web site:** **www.wedi.org/snip**

◆ **SNIP listserv:** **snip@wedi.org**

◆ **Questions on SNIP Regional Efforts:**

– Walter Suarez, Minnesota Health Data Institute walter.suarez@mhdi.org

– Holt Anderson, North Carolina Health Information and Communication Alliance holt@nchica.org