Security & Privacy Work Group

- SPWG Introduction

Security and Privacy Workgroup co-Chairs:
  - Lesley Berkeyheiser
  - Walt Culbertson
  - Andy Melczer
  - Sue Miller

Why the SPWG?

- Establish consensus on the most significant health care community-wide HIPAA implementation issues
- Develop a strategic plan to address these issues
- Mitigate national deployment obstacles
The Security NPRM and Privacy Final Rule

- Both security and privacy exhibit many parallel and cross-over issues which would be difficult to coordinate across separate workgroups
  - Both Security and Privacy requirements anticipate ‘audit trails’ and ‘safeguards’
  - ‘Protected health information’ verses ‘individually identifiable health information’
  - ‘Business associate contracts’ verses ‘Chain of Trust agreements’
  - ‘Minimum Necessary’ verses ‘Need to Know’

Security Sub-Workgroup Efforts

- Organized Security Sub-Workgroups around the 4 consensus security issues:
  - Awareness/Organizational Change Management
  - Audit Trail Clarification
  - Certification and Accreditation
  - Vendor Technologies and Interdependencies

Privacy Sub-Workgroup Efforts

- Privacy Sub-Workgroups were formed to address the 6 consensus privacy (and crossover security) issues identified:
  - Preemption
  - Access / Amendment
  - Minimal Necessary
  - De-identify/re-identify
  - Notice Vs. Patient Consent
  - Electronic Vs. Paper
Along the way ...

- Polices and Procedures sub-group formed
  - choose WEDI SNIP Security and Privacy

New Sub-Workgroup Efforts

- Formed after the June 2001 Meetings
  - Small Provider
  - State Agencies
  - ERISA
  - NCPDP 5.1 versus Minimum Necessary

Privacy Guidance
released July 6, 2001

- Work group completed review of Version 3 white papers against comments from the AMA, and the Privacy Guidance
- Work group will review the current Version 3 white papers against the security final rule when released
SNIP Privacy Guidance Webcast

- September 26, 2001
- Linda Sanches, DHHS/OCR
- Richard Marks, SPWG, DWT
- CD available

Vendor Technology & Interdependency Subgroup

- Low Level & Value Added Solutions to Security Services and Mechanisms
- Tools and Technology Survey
  - 7 Survey Questions

Policies and Procedures Subgroup

- Implementation Considerations and Issues
- Risk Considerations
- Several Outlines
  - Minimum Necessary
  - De-identified PHI
  - Business Associates
  - Deceased Individuals
  - Workstation Use
  - Termination Procedures
Small Practice Implementation Subgroup

- Model HIPAA Privacy and Security Audit for Small Practices
- Consent, Authorization, Notice document
- Disclosure without Consent or Authorization
- Policy Needs
- Employee Manual Needs

State Agencies Subgroup

- Are state agencies covered entities?
- What unique issues are state agencies faced with in HIPAA implementation?

WEDI SNIP Summit Working Toward Solutions

- When: November 12 - 14, 2001
- Where: Orlando Florida
- Material: Tracks
  - General
  - Transactions
  - Security & Privacy
  - Provider
November 12 -- 14, 2001
SPWG Sessions

- 10:15 AM, November 12, 2001 Small Practice Implementation Subgroup
- 11:55 AM, November 12, 2001, HIPAA Enforcement Panel
- 3:55 PM, November 12, 2001 Policy & Procedure Subgroup

November 12 -- 14, 2001
SPWG Sessions

- 10:55 AM, November 13, 2001, SPWG Update
- Noon, November 14, 2001, Impacts on Staff, Change Management

HOW TO JOIN SPWG

- Join the WEDI mailing list at http://www.wedi.org/forms/form.cfm?id=1
- Join the SPWG by sending an email to Lesley Berkeyheiser at Lberkeyheiser@home.com
- Email Sue Miller at Sue_Miller@idx.com or call 617-266-0001, x2214