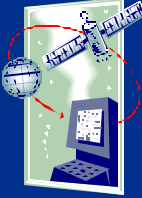


2001 - A HIPAA ODYSSEY

WEDI SNIP SPWG Update
 October 26, 2001
 Third National HIPAA Summit




SPWG Co-Chair:
 Sue Miller -- IDX

Security & Privacy Work Group


- ◆ SPWG Introduction

Security and Privacy Workgroup co-Chairs:
 Lesley Berkeyheiser
 Walt Culbertson
 Andy Melzer
 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
- ◆ Version 3 white papers released July 2001 at <http://www.snip.wedi.org/public/articles/index.cfm?cat=2>
 - 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