HIPAA Training +: Beyond Compliance to Culture Change

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The Internet Healthcare Coalition
e-Health Quality Partners
HIPAA Training

- Not just a legal requirement, but a positive opportunity

- Foster positive culture change in organizations affected by the regulations

- Assess and address larger organizational challenges
HIPAA Training in Context:
The Internet Healthcare Coalition

- Founded 1997
- International scope
- Mission: Quality healthcare resources on the Internet
- Broad constituency
- Focus on educating
  - e-health executives, managers, practitioners
  - policymakers, regulators
  - consumers, patients
The e-Health Ethics Initiative: Awareness, Education and Training

- Genesis of the e-Health Ethics Summit, Washington, DC, 2000
- Broad framework: 8 guiding principles
- A living document, not a rigid set of rules
- Belongs to all individual and organizational e-health stakeholders
- A basis for educating providers and consumers
  - e-Health Ethics Workshops
  - Tips for Consumers
- A basis for earning consumer trust
e-Health Code of Ethics: 8 Guiding Principles

1 Candor
- Disclose vested financial interests
- Disclose key information for consumer decisions

2 Honesty
- Present information truthfully
- No misleading claims
e-Health Code of Ethics: 8 Guiding Principles

3 Quality
- Accurate, clear, current, evidence-based
- Readable, culturally competent, accessible
- Citations, links, editorial board and policies

4 Informed Consent
- Privacy policy and risks
- Data collection and sharing
- Consequences of refusal to consent
e-Health Code of Ethics: 8 Guiding Principles

5 Privacy
- Prevent unauthorized access or personal identification of aggregate data
- Let users review and update personal data

6 Professionalism
- Abide by professional codes of ethics
- Disclose potential conflicts of interest
- Obey applicable laws and regulations
- Point out limits of online practice
e-Health Code of Ethics: 8 Guiding Principles

7 Responsible partnering
- Choose trustworthy partners, affiliates, and links
- Maintain editorial independence from sponsors
- Tell users when they are leaving the site

8 Accountability
- Provide management contact info
- Encourage user feedback
- Respond promptly and fairly to complaints
Compare with the basis for HIPAA: Principles of Fair Information Practices

- Openness
- Individual participation/rights
- Security
- Accountability
- Limits on use, collection, and disclosure of information
HIPAA Training in Context: e-Health, Privacy and Quality

- The Internet Healthcare Coalition exists at the intersection of
  - Healthcare
  - Technology
  - Privacy
  - Quality.
- So does HIPAA!
Culture change is about

- Infusing ethics throughout the organization

- Empowering employees at all levels to do the right thing
Ethical Organizational Culture: Ignore at Your Peril!

- Ethical insensitivity can create
  - Legal disasters
  - Organizational disasters
  - Public relations disasters
  - Financial disasters
  - Public health disasters
Ethical Organizational Culture: The Business Rationale

- Meeting legal and regulatory requirements
- Building an ethical brand/corporate image
- Building shared norms and values
- Building the framework for quality
- Meeting consumer/patient needs and expectations
Ethical Business Practices: What Consumers/Patients Tell Us

- Consumer concern about privacy is high and growing higher
- Consumers becoming increasingly active in protecting their privacy
- Independent third-party verification of privacy practices builds confidence and brand loyalty
- Privacy notices that are scrupulously followed build confidence and brand loyalty
High level of distrust for electronic collection of information

Demand for accurate information, choice and control in healthcare decisions increases with consumer share of costs

Increased willingness to change providers if dissatisfied
Implications for Healthcare Businesses

- Privacy protection is a marketing opportunity
- HIPAA training to meet minimal requirements is a costly, temporary fix
- Leverage HIPAA compliance to meet larger business objectives
Leverage HIPAA Compliance

- Organizational mission
- Business objectives
- Larger training, education, retention, and hiring considerations
- Organizational culture, norms, and values
Cultural Considerations

- Four perspectives on organizational culture
  - Structural
  - Interpersonal
  - Political
  - Symbolic

Source consulted: Bolman and Deal
Cultural Incentives and Barriers: 4 Perspectives on Privacy and Trust

- **Structural**
  - Physical, electronic, and organizational systems
  - Roles and responsibilities

- **Interpersonal**
  - Modeling and building trusting relationships
  - “Walking the walk”

Source consulted: Bolman and Deal
Cultural Incentives and Barriers: 4 Perspectives on Privacy and Trust

- **Political**
  - Rewarding ethical behavior even when it involves risks
  - “What gets measured is what is valued”

- **Symbolic**
  - Stories and myths
  - Rituals

Source consulted: Bolman and Deal
HIPAA: Incentive for a Culture Audit

- Analogy: security gap analysis
- Assess cultural receptiveness to the demands of HIPAA
- Align culture with mandated training goals
- Leverage training dollars
- Improve quality
- Build in continuous assessment and improvement
e-Health Quality Partners and The Internet Healthcare Coalition

- e-HQP: exclusive education and outreach affiliate of the Internet Healthcare Coalition
- Strategic business alliance
  - VirSci: privacy, usability, and quality in pharma and health marketing
  - Metaforix: organizational planning, learning, and communications
- Builds on ethics training experience and broad stakeholder base
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Background and decision-making resources

- eHealth code of ethics
  www.ihealthcoalition.org/ethics/ethics.html


Background and decision-making resources

- Privacy & American Business. “Privacy on & off the Internet: What consumers want.” 2/02
  Westin, A. “A very revealing privacy survey”