

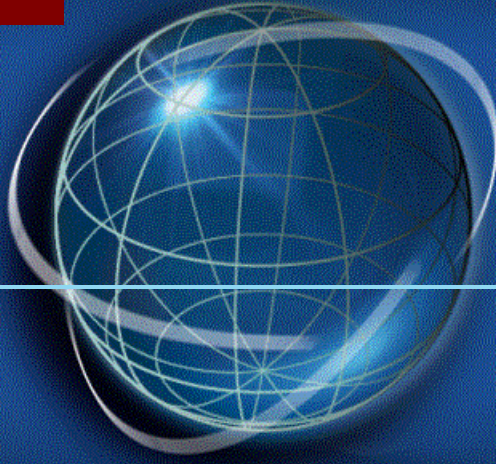
## The Fifth National HIPAA Summit

October 30 - November 1, 2002  
The Waterfront Marriott  
Baltimore, MD



### RFA Project Plan Development Methodology™

A Framework for  
Developing a HIPAA  
Compliance Project Plan



Presented by Rachel Foerster, Principal  
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## Only 1 in 5 EDI or eCommerce Projects Succeed

- Common characteristics of successful projects:
  - Up front assessment & analysis
  - Well-thought-out business strategy
  - A focused project plan
  - Effective management of the project plan
  - An understanding of the various technologies to be exploited



## Learning Objectives

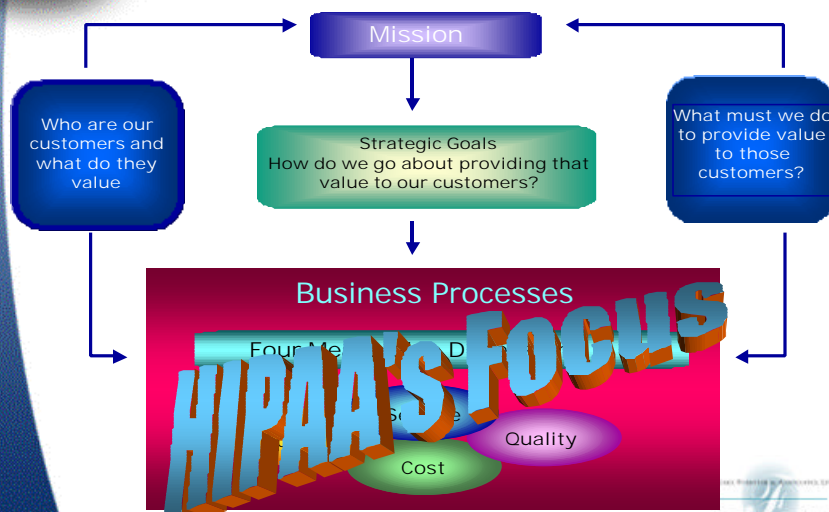
- How to link business goals to the EDI/EC technology strategy
- Understand the key activities required for project plan development
- Identify the key elements of a project plan
- Identify project plan development challenges
- Learn some pitfalls in developing your HIPAA Compliance Project Plan
- Understand major phases of a HIPAA project plan

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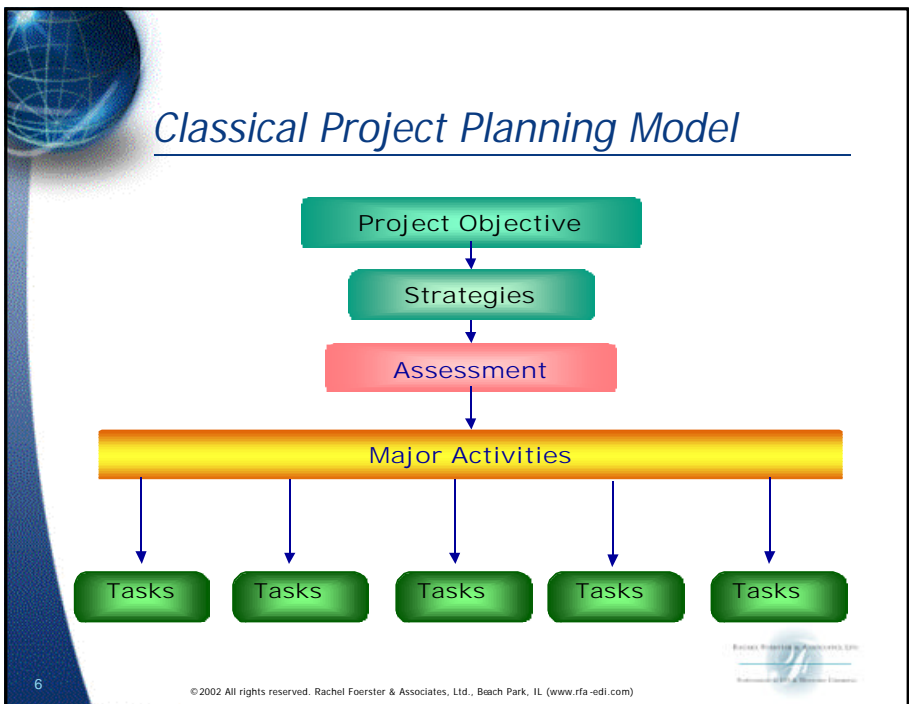
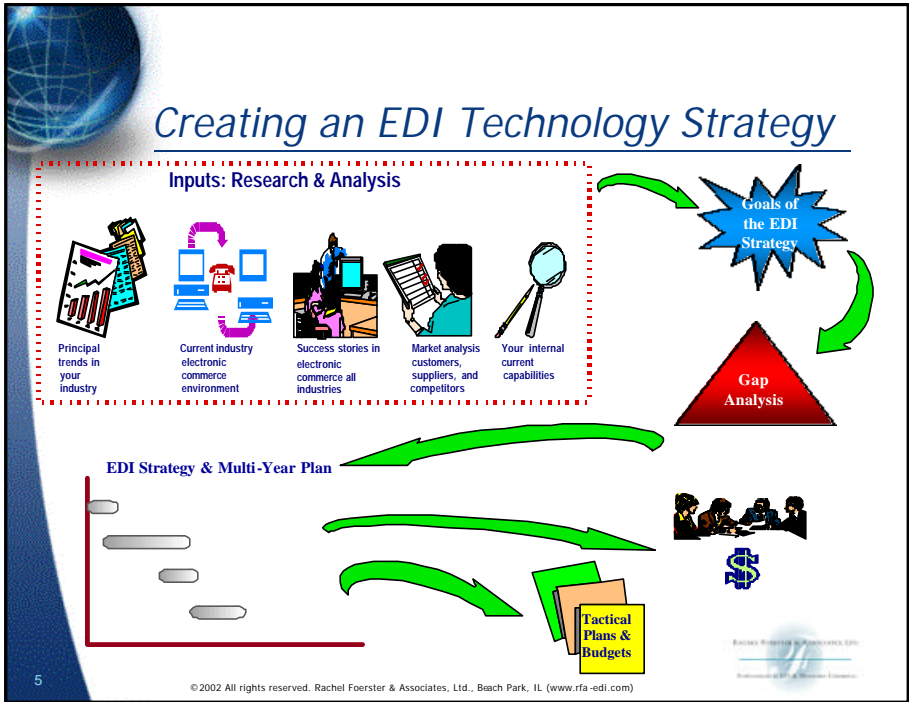
## RFA Strategic Planning Model™



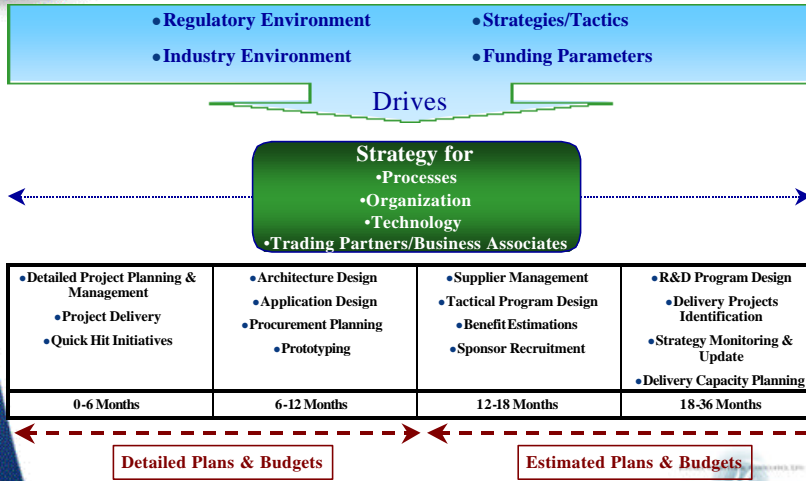
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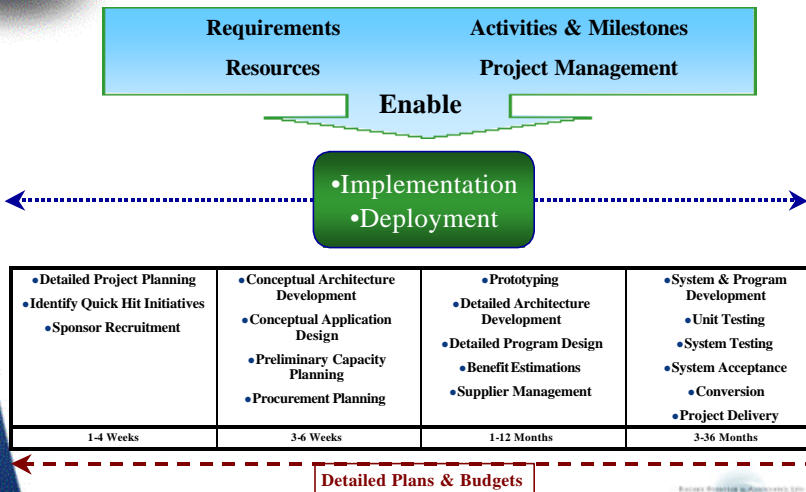
## Typical Project Plan Development Model



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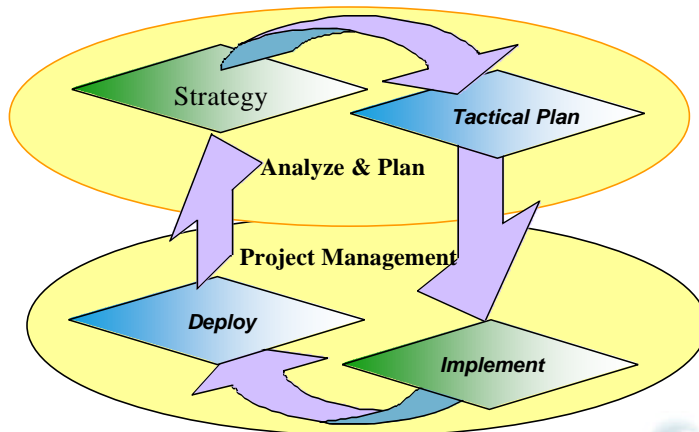
## Typical Project Plan Development Model



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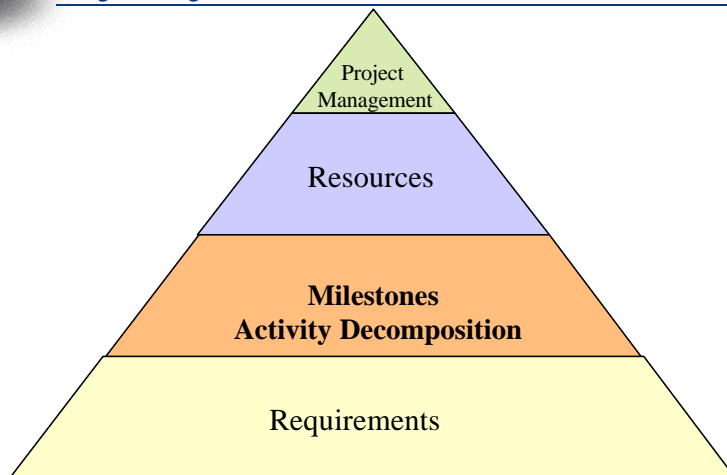
## Recommended Project Management Process



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## Key Project Plan Elements



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## Project Plan Development Challenges

- Requirements analysis
- Avoiding “scope creep”
- Identifying desired milestones
- Determining deliverables
- Managing the project
  - Resource management
  - Documentation
  - Reporting
  - Acceptance criteria

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## Requirements Analysis

- Setting categories
  - Business
  - Operational
  - System
    - Functional
    - Technical
    - Performance
- Expressions of needs
  - Writing behavioral requirements . . . what the system and people must do

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## Requirements Analysis Pitfall

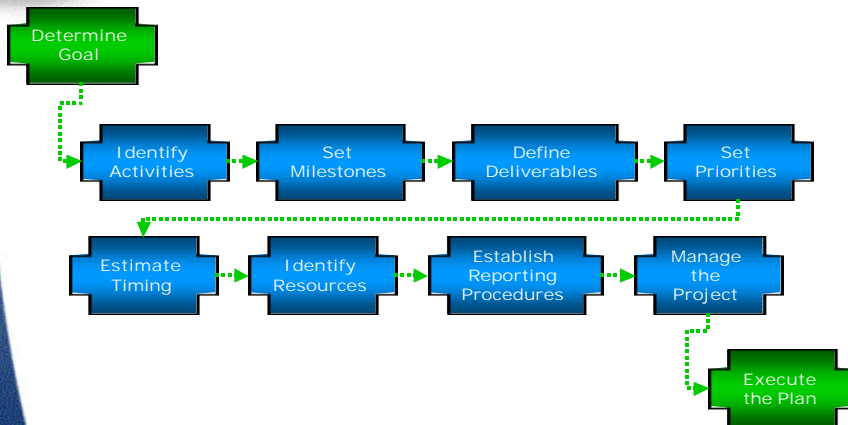
- Determining the
  - Must have
  - Optional
  - Nice to have

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## Project Plan Elements



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## Determining the Project Goal

- What is the purpose of the project?
  - Another scope challenge




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## Identify Project Activities

- What to do
- Decompose into tasks
- Determine Dependencies/Predecessors




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## Set Project Milestones


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- Key decision points
  - Checkpoints
- Order/sequence the activities
  - Determine desired dates






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## Project Deliverables


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<ul style="list-style-type: none"> <li>● The “thing(s)” to be delivered</li> <li>● Criteria           <ul style="list-style-type: none"> <li>– How to know if the “thing” is complete               <ul style="list-style-type: none"> <li>● Functionality                   <ul style="list-style-type: none"> <li>– Provides basic capability desired</li> </ul> </li> <li>● Performance</li> <li>● Acceptance                   <ul style="list-style-type: none"> <li>– Quality</li> <li>– Performance</li> <li>– Functionality                       <ul style="list-style-type: none"> <li>● Efficient and effective</li> </ul> </li> </ul> </li> </ul> </li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>● Responsibility           <ul style="list-style-type: none"> <li>– Who will declare the “thing” is complete?</li> </ul> </li> <li>● Authority           <ul style="list-style-type: none"> <li>– Who will accept the “thing”?</li> </ul> </li> </ul>
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## *Project Priorities*

- Determine what activity/task is relatively more important than another
  - Identify dependencies

Set Priorities

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## *Project Schedule & Timeline*

- Activity/task duration
  - How long to complete
    - Person hours?
    - Calendar time?

Estimate Timing

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## *Project Resources*

- People, time, dollars
- People
  - Identify
    - Skills
    - Where to obtain
  - Assign
    - Responsibility
    - Authority

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## *Project Reporting*

- Frequency
- Method
- Reporting tools
- Content
  - Accomplishments for time period
  - Tasks for next time period
  - Issues requiring management attention

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## Project Management

- Select appropriate tools
  - Keep it simple
- Allocate resources
  - People, dollars to stay on schedule
  - People, schedule to stay on budget
- Manage expectations
  - Stakeholders
    - Owners
    - Workforce
    - Customers
    - Suppliers
    - Other business partners




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## Execute the Plan

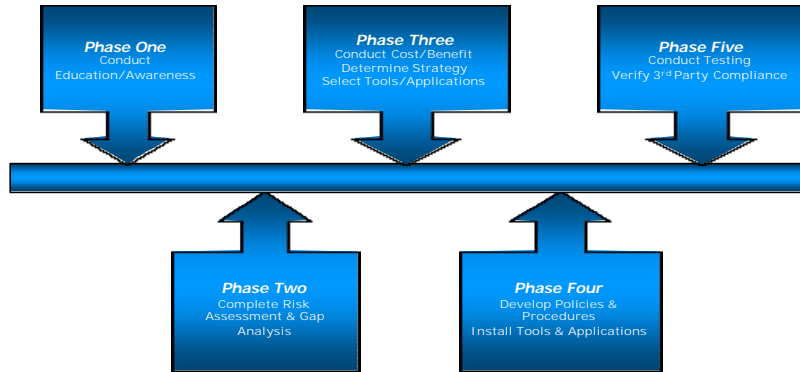


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## Conceptual Phases of a HIPAA Project Plan\*



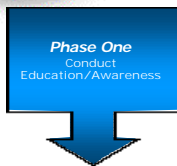
\*Adapted from the Gartner Group HIPAA COMPARE Scale

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## Key Phase Activities




- Prepare and conduct organization-wide general education & awareness program
  - HIPAA, law & regulations
    - Electronic transactions
    - Code sets
    - Privacy
    - Security

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## Key Phase Activities

**Phase Two**  
Complete Risk  
Assessment & Gap  
Analysis

- Conduct formal assessment of vulnerabilities
- Determine activities needed to achieve compliance with
  - EDI
  - Privacy
  - Security

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## Key Phase Activities

**Phase Three**  
Conduct Cost/Benefit  
Determine Strategy  
Select Tools/Applications

- Quantify tangible/intangible costs/benefits to realize compliance
- Develop compliance strategy
- Strategy should use HIPAA as an enabler for achieving overall operational and business benefits

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## Key Phase Activities



- Complete compliance policies & procedures
- Communicate policies & procedures to workforce
- Complete selection of physical tools needed for
  - EDI
  - Security
  - Privacy Documentation Administration
- Determine systems remediation strategy
  - Upgrade
  - Replace

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## Key Phase Activities



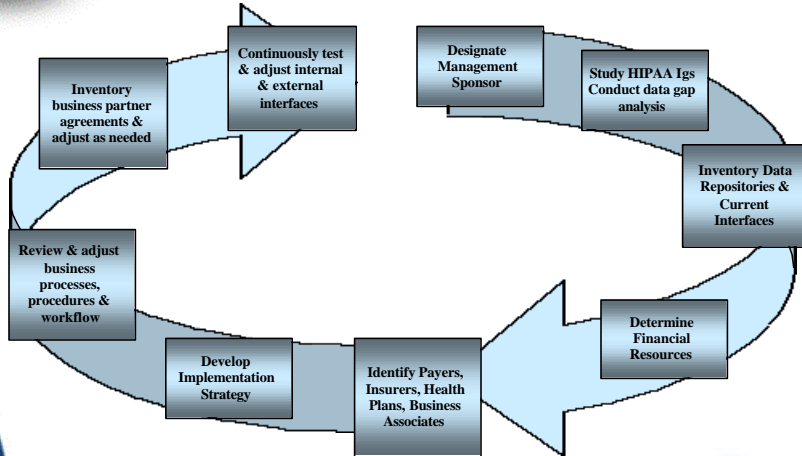
- Complete testing of all tools & systems
- Conduct audits
- Verify 3<sup>rd</sup> party compliance
- Develop on-going auditing & monitoring procedures
- Establish process to address & manage changing requirements

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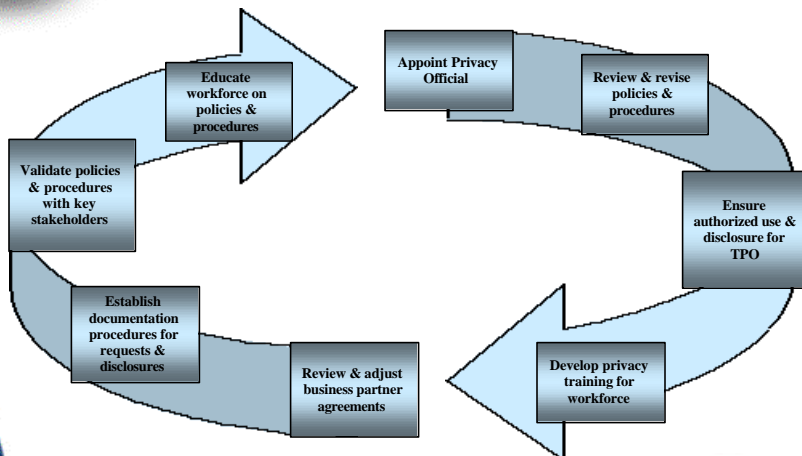
## EDI Key Activities



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## Privacy Key Activities

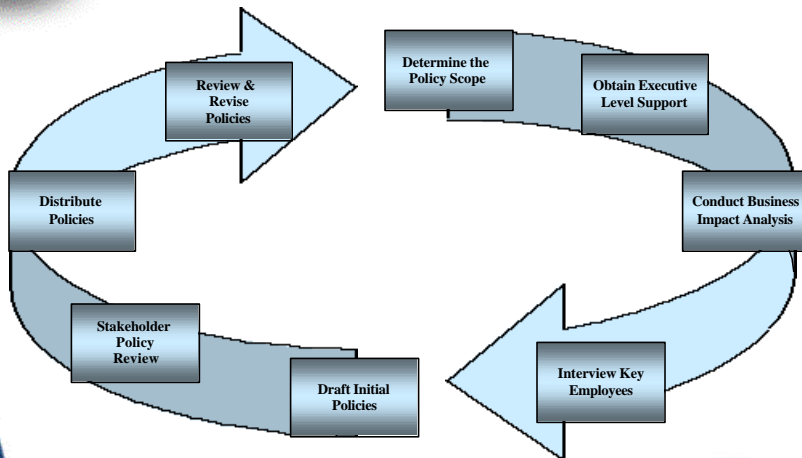


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## Security Key Activities



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## Pitfalls in developing your HIPAA Compliance Project Plan

- Determining the objective of your HIPAA “compliance” project
  - Project goal must be stated clearly such that it can be measured – how will you know you achieved the objective?
- Identifying “how” at a high level you plan to achieve the project objective, e.g.
  - What resources to use (people, time, dollars)
  - Where you’ll get the resources
  - Funding constraints
- Initial assessment effort
  - Don’t need to dot every “i” or cross all “t’s”
  - Need to assess **ONLY** to a level “sufficient” to create detailed project plan, to identify resources needed, to establish initial budgeting requirements

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## *The Objective . . .*

- To develop a detailed project plan that will be the roadmap to the end goal
  - A plan that
    - is sufficiently specific
    - can be managed
- Remember . . . No plan is cast in concrete
  - Expect change
  - Anticipate the changes
  - Plan for change
  - Manage the change

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# **HIPAA Compliance**

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# **Administrative Simplification**

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HIPAA is NOT an IT Project

**Administrative Simplification**

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