Administrative Simplification Trilogy

• Transactions and Code Sets (TCS)
  • October 16, 2003 compliance date

• Privacy
  • April 14, 2003 compliance date

• Security*
  • April 21, 2005 compliance date

* the last piece, finally!
Security Rule Timeline...

• National Information Infrastructure Risk Assessment Report - February 29, 1996

• National Research Council Report, *For the Record: Protecting Electronic Health Information*, 1997
Security Rule Timeline...

- **NPRM** originally posted to the Federal Register on **August 12, 1998** (relied upon research on 55 ANSI standards, European CEN standards, ISO 17799, BS 7799, and HCFA Internet Security Policy - published 11/24/98)

- **HIPAA Security Summit** - Baltimore, October 1998: to foster industry involvement and best practices development
Security Rule Timeline

• Final Rule sent to the Office of Management and Budget (OMB) on January 13, 2003
• Published in *Federal Register* on February 20, 2003
• Compliance by April 21, 2005
• An extra year for small payers – Below $5 million: April 21, 2006

Final Rule available at: http://aspe.hhs.gov/adminsimp
Serendipity Effect of Privacy Compliance

- Complying with the Security Rule should be fairly easy if you have done the preliminary work for Privacy- PHI flow, risk assessments
- Implementation of “safeguards” to protect the privacy of PHI
- Balance through synchronization and symmetry
This Afternoon’s Agenda

• Implementing and Enforcing the HIPAA Security Rule- John Parmigiani, CTG

• Healthcare Security Professional Roundtable-
  • Drew Hunt, Valley Medical Center-Renton, WA
  • Ali Pabrai, HIPAA Academy- Clive, IA
  • Ken Patterson, Harvard Pilgrim Health Care- Wellesley, MA
  • Tom Walsh, Tom Walsh Consulting- Overland Park, KS
  • Richard Marks, Davis Wright Tremaine- Washington, DC
  • John Parmigiani, CTG HealthCare Solutions- Cincinnati, OH
And now, for the presentation:

Implementing and Enforcing the HIPAA Security Rule