

1.03 HIPAA IMPLEMENTATION: HOW TO MEET HIPAA REQUIREMENTS WITH A LIMITED HIPAA BUDGET

Monday, September 13, 2004

11:00 a.m. – 12:00 p.m.

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Saint Vincent Catholic Medical Centers of New York

SVCMC Overview

Hospitals

- St. Vincent's Manhattan
- St. Vincent's Staten Island
- Baley Seton Hospital
- St. Mary's Hospital
- St. Joseph's - Hospital
- St. John's Queens - Hospital
- St. Vincent's Westchester (BHS)
- Mary Immaculate Hospital

Nursing Homes

- Monsignor Fitzpatrick
- St. Elizabeth Ann's
- Holy Family
- Bishop Mugavero

Home Care

Hospice

USFHP

Research

Development Marketing

Where Does the Buck Stop? Establish Core HIPAA Team

SVCMC's HIPAA Team

- Compliance Department (2 people)
- IS Leaders (2 people)

SVCMC HIPAA Organization

- Overall Coordination Provided by Joint Compliance/Information Services Leadership
- Appointment of Key Regionally-based Individuals to Help Coordinate “Local” Awareness, Education, Data Collection and Compliance
- Ongoing Monitoring and Review provided by the Corporate Compliance Department
- Approach Needs to Integrate HIPAA Awareness and Compliance into the SVCMC Culture - Must Become a Way of Life

Show Me The Money Privacy

- First HIPAA presentation –
December 2000
- First official HIPAA Budget –
January 2003

Q. What can you get for free?

A. HIPAA awareness

What Must Be Done Triage the “Patient”

- Make friends with IS
- Set realistic goals and deadlines
- Be honest about your own weaknesses
- Review HIPAA schedule and determine what you can realistically achieve
- Triage – what must be immediately corrected?

For Privacy:

- HIPAA awareness Business Associates
- EDI Policies
- Authorization NPP

Be a Clock Watcher

- Review the HIPAA schedule – be aware of deadlines e.g., EDI extension.

Who is a HIPAA Expert?

Q. Who is a HIPAA Expert?

A. No One

B. Everyone

C. All of the above

Become A HIPAA Expert

- Read EVERYTHING or as much as humanly possible
- Misery loves company - join a “support group”
- HIPAA abhors a vacuum - leave the office
- Get involved in JCAHO activities
- Make friends with HIM, Quality, and Risk
- Determine if you need outside help

External Assistance

SVCMC's Consultants

- Kurt Salmon Associates – assist with gap analysis organization
- Health Care Compliance Strategies, Inc – online HIPAA education tool

This Is Not A One Sheriff Town

- Deputize – the best way to increase HIPAA awareness is to make privacy everyone's responsibility.
- Use free labor
- Who is already be involved in privacy?

Gap Analysis On The Fast Track

- No interviews – directors/manager responsible for privacy and security questionnaires
- Policies – HIPAA office responsible for drafting
- Be a shark - keep moving forward – keep the process going

SVCMC - April 2003

- HIPAA Policies Established
- HIPAA Online Training Complete for “essential personnel”
- EDI testing begun
- HIPAA forms (e.g. authorization) complete, translated, implemented

SVCMC - October 2003

Goals vs. Reality

- All SVCMC personnel HIPAA trained
- EDI compliant
- Old policies pulled or re-drafted
- Business associates process completed
- Privacy office fully up-and-running

HIPAA – The Next Generation - Security

- Stay focused on the issues - not on the “new toys”
- Risk Analysis
- Use security goals of confidentiality, integrity, and availability as guides to stay focused – don’t just “plug the gaps”

SVCMC's Security Approach

- Group therapy
- Leadership support
- Evaluate what we have
- Identify what we need
- Identify possible threats (ATE)
- Evaluate our score
- Fix the problem
- Reevaluate the risk
- Document, document, document
- Stay on our toes

Security and Privacy

- Privacy and security can tag team –
 - Couple your risk analysis with your privacy monitoring
 - Note where security initiatives impact privacy

Seven Rules To Keep In Mind

1. Money for education is never wasted
2. Use consultant cash wisely
3. There is only one captain of any ship – but every captain needs a crew
4. KISS
5. Change is good, change is your friend
6. Don't be afraid to show what you don't know
7. Play nicely with others

Conclusion

Think Creatively, NOT Expensively