



The HIPAA Colloquium

At

Harvard University

August 19-23, 2002

The HIPAA Challenge

- Many organizations see HIPAA as a data security issue. Others see it is an information technology project. Still others look at it as an isolated-laws-and-regulations-compliance project. But what HIPAA is really about, in our view, is the business of better running health care organizations such as yours. It's about data security, systems, and compliance all at the same time. It's about improving the overall business – and helping it to run more efficiently at less cost.
- It's about Change Management
 - Comprehensive Analysis of Current Procedures.
 - Comprehensive workflow analysis and data model to avoid major errors.
- Detailed Vision of Future State
 - Best Practices must be understood in detail
 - Step-by-Step Implementation Plan
- Appropriate Staffing and Funding
- Internal Education

HIPAA Requirements will have widespread Impact on HCO's

Consideration Areas -

- Provide the same afforded protection of our health data as that of our banking data
- Electronic data transmission and formats
- Application and network security
- Audit trails/history within applications, between applications based on need to know basis
- Network architecture
- Data storage
- Vendor compliance issues
- Vendor contract issues
- Contingency planning
- Disaster recovery
- Patient information access
- Organizational effectiveness
- Business associates

Drivers are not just HIPAA – Business Too

- What level of customer service should I provide?
- What services will mean the most to my customers?
- Are my customers confident that we are protecting their confidential data?
- How can I differentiate myself based on service in today's marketplace?
- How can I translate improved service into profitable growth?
- What level should I provide to which customers?
- Can I balance Cost and Security Consciousness assets and investments?

Business Impact Analysis

- The Business Impact Analysis is a feature unique to our approach for HIPAA compliance
- Performed prior to the finalization of our recommendations, it is intended to rationalize your investment in HIPAA compliance by integrating the recommendations with your strategy and identifying potential operational improvements through full implementation of HIPAA
- If fully implemented, HIPAA may lead to decreased cost and improved efficiency for the organization
- To be truly effective and integrated into the organization, controls must be built into, not on top of, existing processes and controls
- This Business Impact Analysis focuses in three specific areas: Potential for Operational Benefits, Integration with Corporate Strategies and Organizational Structure

To Do List

- Assess (business, system, people) gap
- Build a strategy (Integration)
- Mediate the gap/deliver opportunity
- Educate and Demonstrate Competency
- Identify and Enable Technology
- Determine strategic action/investment pathway
 - Satisfies business need
 - Meets HIPAA requirements
 - Shares vision and mission

Success Characteristics

- Traits
 - Information Availability
 - Program Management
 - Business Management Information
 - User participation
 - On Line Education
 - Faster development cycle
- Actions
 - Crystallizing the unifying vision
 - Coordinating the development
 - Securing the required skills and tools
 - Demonstrating value, return on investment

Reconciling Objectives – Where to Look

- Planning is required and necessary
- Identify compelling events – pain
 - Budget disputes
 - Process confusion
 - Multiple priority #1 efforts
 - Under-achievement
- Action Plan, Budget Responsibility and Business Impact
- Operational Effectiveness and Change Management
 - Train
 - Measure
 - Feedback
- Unifying vision is necessary

Embrace Business Needs & Trends

- Virtual business community
- Collaboration, business process integration
- Web front end integration with legacy back end
- Secure, agile environments and transactions
- Technical Renovation and Agility
- Web integration
 - Education and Communication
 - Business and Executive applications
 - Data to Information
- Electronic distribution
 - Bill Presentment
 - Reports Distribution
 - Document Management

Technology Competencies

- Application Technology
 - Application Development
 - Workflow
 - Document Management
 - Data Warehousing
- System Technology
 - Architecture
 - Performance Engineering
 - Networking
 - Enterprise Integration
 - Database Management
 - Systems Management
- Web Technology
 - User Experience
 - Personalization
 - Content Management
 - Catalogs
 - Commerce Transactions
 - Security
 - Community
 - Information Access

Recognize

- “Clicks and mortar” is viable and anticipated
- Power of Brand recognition at browser vs.. at site
- Influence of web is growing
 - ease of use
 - depth of content
 - power of transactions
- Internet/Web Access has delivered on savings
 - lower cost per transaction
 - successful in other industries thought to be high touch
- Web centricity supports community/user personalization to engage at multiple levels in multiple ways
- Understand that we are still in a transitory state
 - Not all socio-economic groups have access/understand the web tools
 - The web and traditional communication vehicles must co-exist

Strategic Implication

- HCO's can no longer ignore the demand for effective web based applications and integration to patient data
- Consumers expect the same convenience and empowerment they currently have in other industries
- HCO challenge is to empower and satisfy consumer
 - Billing Inquiries
 - Registration & Scheduling
 - Results Reporting & EMR
 - Reviewing and possibly modifying their own medical record
- Internet opportunities include both new business models and web based enabling of existing business models
- Cost reductions possible from web based transaction applications offer a financial advantage
- Browser based systems offer greater flexibility than traditional applications and can be deployed much quicker

Strategic Implication

- HCO's must develop a web centered organizational culture
 - Content developed as a by product of existing jobs
 - Content should be standardized – format and presentation is critical
 - Content needs to change in order to provide repeat visit value
 - Look for programs or components that differentiate (health, self-assessment, online medication refills etc.)
 - Develop enabling infrastructure that is
 - Intuitive
 - Caregiver, patient, community member centric
- HCO's must create a formal, strategic planning process with phased in goals and priorities that speak to:
 - Business and Strategic alignment
 - Remediation
 - Renovation
 - Replacement
 - Retirement

Provide Education & Communication

- Intuitiveness is a two way street
- Must be agile, nimble and quick
- Must explain, instruct and inform
 - Identify Performance metrics
 - Identify Consequences and Opportunities
- Must be available when the user is available
 - Matrix the objectives
 - Present in the user's realm of understanding
- Must be useable and comprehensive
 - Format and delivery appropriateness
 - Track participation and competency

Implementation of the Solution

Select solution paths...

- Integrate
- Buy
- Build
- Remediate
- Outsource
- Short-term and long-term

Giving consideration to:

- E-Health strategy's impact on future connectivity channels and business processes
- Business unit initiatives
- Business process impacts and potential leverage points
- Relative cost magnitude and expected returns
- Resource and capital constraints

Sustain the Effort

- HIPAA must be integrated into the business to achieve an effective steady-state environment
- Ensure ongoing training and employee recertification
- Evaluate implications for changing processes
- Assess impact on new initiatives
- Monitor compliance of business partners and providers
- Evaluate and refine internal HIPAA-specific processes through compliance and audit programs

Pitfalls to Avoid

- Adequately define HIPAA project office mission and role within the complex and changing environment
- Do not underestimate the time required to get your arms around the wide-reaching complexities of HIPAA
- Do not underestimate the importance and impact of privacy
- Do not lose sight of the ultimate goal - a dynamic process, built into your organization, to sustain HIPAA compliance
- Do not place the success of HIPAA on only one or two individuals - HIPAA is an all-pervasive, organization-wide effort
- Capitalize on opportunities for AS savings and integration with initiatives and strategies

Project Considerations

- Most organizations have already formulated
- strategic business plans that are designed to improve operations and capitalize on emerging technologies
- To ensure adequate consideration of your strategic plans and initiatives:
 - Gather information on your business and technology strategies
 - Formulate a plan for integrating HIPAA into existing initiatives and strategies.
 - Validate the plan with senior management
- Automated, Integrated Assessment vs. Manual Assessment Solution
 - Regular updates for changing guidelines focused on and delivered to business user
 - Continuing reports on progress for assessment and remediation, monitored by business user; continuous communication at every level of organization
 - Centralized database using existing and developing technology channels
 - Dynamic gap analysis with capability to meet new challenges with minimal re-tooling
 - Simultaneous sessions on impact and communications on status
 - Capture of modification to business agreements and compliance status
 - Reassignment of responsibilities when personnel changes are made
 - One place where all compliance (requirements, tools, documentations and status) comes together for user and for organization
 - Overall ease of administration

ASP Delivery – One Stop Ease



Summary

- Invest
 - Skill and proficiencies
 - Strategic planning
 - Include all technology and information, not just IT
 - Anything that can analyze, store, communicate or present information
 - Business Process Design/Redesign and discrepancy resolution of variance
 - Dynamic, not static library of business assessment and investment
 - Comprehensive, real time understanding of plan and information, distributed database with business owner access and contribution
 - Ongoing compliance with HIPAA and others (NCQA, JACHO, etc)
- Consider
 - Models where there is increased breadth and depth
 - User centricity and mobility
 - What is unfixable, what can be leveraged, what has a future
 - Underserved business areas and policy/procedures
 - Reporting that identifies aggregate and detail, monitors progress, prepares for analysis and remediation support
 - Pervasive, not invasive
- Act
 - Value Proposition and Benefits
 - Needs and Requirements

On Line Assessment

HIPAA Xpediator

HELP BUS. ASSOC. SOFTWARE LOGOUT

NAME: Bob Smith DEPARTMENT: Genetics JOB CLASSIFICATION: Lab Assistant

STATUS: Yes Pending No Uncertain Not Applicable

Questions In This Section: 10 Number of Questions Answered: 0 Percent of Section Questions Completed: 0%

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In House Legal

QUESTIONS

VIEW HIPAA REGULATIONS RESOURCE GUIDANCE

1) Is your organization currently involved with any business associate with whom they process protected information?

Comments

STATE & HIPAA

HIPAA Flags

Organizational Procedures and Policies Manual, Business Partnership Agreements

Document Location Description

Done Internet