

Tufts Health Plan
HIPAA Privacy Implementation Timeline

2001					2002												2003					
Aug.	Sep.	Oct.	Nov.	Dec.	Jan.	Feb.	Mar.	Apr.	May	June	July	Aug.	Sep.	Oct.	Nov.	Dec.	Jan.	Feb.	Mar.	Apr.		
Analysis and Documentation of Privacy Regulations																						
Develop and Deliver Educational Presentations to Internal Departments																						
				Develop Questionnaire	Identify and Educate Users	Users Complete Questionnaire	Analyze Responses															
					Conduct Current State and Gap Analysis								Finalize Policy on Research									
					Begin Policy on Research																	
					Identify Business Associates				Write Language for Business Associate Contracts				Execute Business Associate Contracts									
					Document Current State of THPs Uses and Disclosures				Develop new workflows		Develop Policies & Procedures		Implement Policies and Procedures & IS Solutions									
					Conduct Gap Analysis																	
						Employers Groups/Brokers: Conduct Planning session, identify requirements				Stakeholders approve recommended approach		Develop Policies and Procedures				Execute Business Associate Contract with Self - Insured Groups						
											Develop Plan & Provide Guidance to Employer Groups				Obtain Certification from Fully Insured Groups							
											Develop Tracking System for BA's of Employer Groups, Certification of Fully Insured Groups & Authorizations of Individual members											
										Document Marketing Current State		Develop Policy & Procedure for Marketing										
										Conduct Gap Analysis												
										Evaluate Training Options/Make/Buy Decision				Create Curriculum		Deliver Training						
										Coordinate the review and approval of all policies and procedures												
										Document and Approve Minimum Necessary Requirements		Minimum Necessary Project in Suspension		Re-Charter and Re-Forecast Project Plan		Develop Policy for Routine Uses, Disclosures and Requests of PHI				Monitor Report Changes		
											Develop Policy for Non-Routine Uses, Disclosures and Requests of PHI		Develop Minimum Necessary Guidelines									
										Draft Privacy Notice		Review and Approve Privacy Notice		CMS & DOI Approval		Design and Printing		Mail Privacy Notice				