



Strategic Approaches to HIPAA Access & Audit

HIPAA Summit West II

March 15, 2002

San Francisco, CA

Mariann Yeager

561.234.9876 tel

561.913.1588 cel

myeager@emersonsg.com

www.emersonsg.com



- HIPAA Expertise
- Industry Leader
- National speaker
- Technology & HIPAA

Agenda



- Role of technology
 - **Access & Audit**
- Implementation considerations
 - **Practical, Vendor & Standards**
- Case Study
- Discussion



Privacy & Security

Technical

- *Access*
- *Audit*

Administrative

- *Policies & Procedures*
- *Training*

Strategic Benefit

Efficiencies –
automation, cost
savings

Trust –
consumers, partners



Access

- **Minimum Necessary**
- **Access Controls – Need-to-know**

Audit

- **Accounting of Disclosures**
- **Audit Controls**

WEDI SNIP Security & Privacy White Paper: <http://snip.wedi.org>



Access

- Reinforce with technology
- Mitigate risk

Audit

- Usage, detail, storage
- Separate vs. centralized



Infrastructure:

- **Enterprise-wide**
- **Disparate systems**

Data:

- **Amount & type**
- **Link users to patient**

Compliance:

- **Ease of use**
- **Universal**

Implementation Considerations Vendors



- Multiple approaches?
- Separate systems?
- Core competency?
- Ability to meet needs?

You are still accountable



Infrastructure:

- **Context Management - CCOW**
- **National Health Information Infrastructure**

Others – *Process & Policies:*

- **Accreditation programs**
- **Best practices**
- **ASTM**
- **NIST**

The Role of CCOW

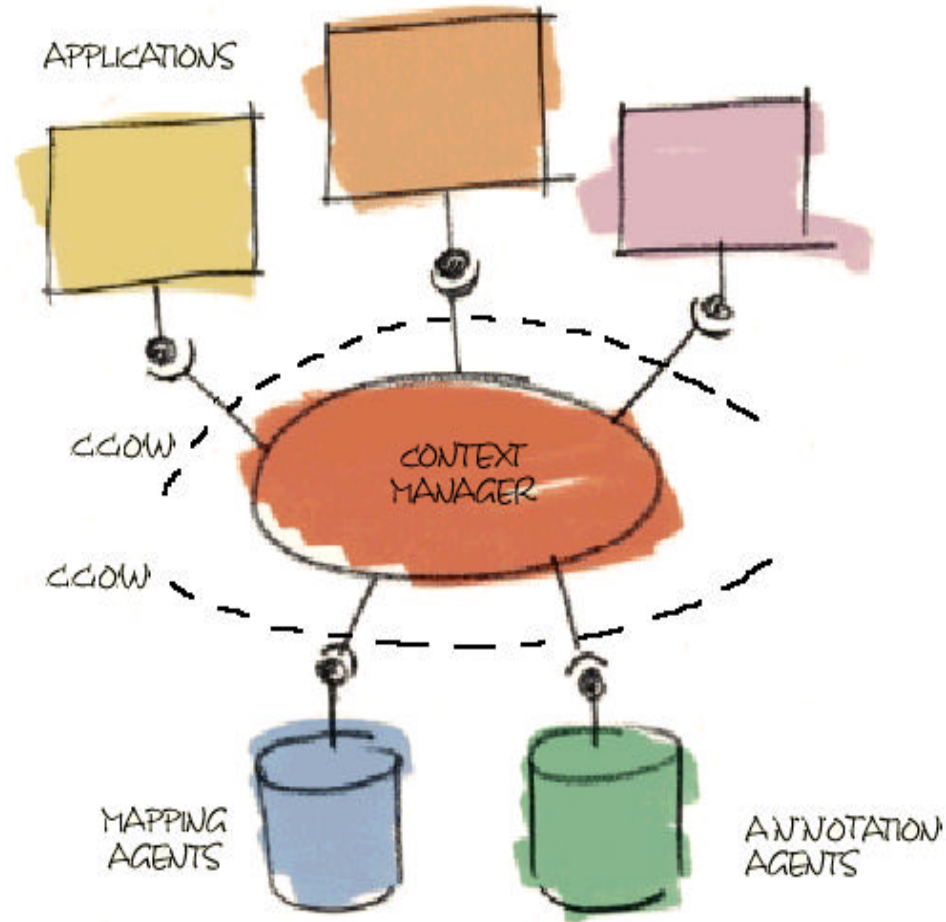


Context Management
Industry Standard
Architecture



Result: Streamlined use of applications

Uptake
Accepted standard
Healthcare-specific





HIPAA Case Study





Largest hospital in Maine:

- 606-bed tertiary care and teaching hospital
- 30,000 inpatient stays
- 140,000 outpatient visits
- 22,000 surgeries
- 3,200 users, 2,100 desktops, 660 systems

Major systems:

- Medical records –100% electronic/imaged
- PACS and departmental
- CCOW Architecture



Broad approach

Reasonable

Leverage technology

- Existing investments
- Keep it simple
- Seek synergies
- Support vision



“... CPR is not a single system. It is several systems seamlessly integrated in the eyes of the user, so that it appears to be one system.”

– *Jerry Edson, CIO*

HIPAA Vision

- Process
- Systematic
- Enterprise-wide
- Leverage for greater good



Centralized oversight

Gap analysis:

- IT Dept.
- Compliance office

HIPAA IT team:

- Lead Analyst
- Two Technical Analysts
- Compliance Analyst



Strategy:

- Address access & audit
- Reasonable approach

Requirements:

- Enterprise-wide
- Meaningful data
- Flexible reporting

Drivers:

- Mitigate risk
- Focus on highest priority

Implementation Considerations



Vendor:

- **Multiple approaches?**
- **Separate systems?**
- **Core competency?**
- **Ability to meet needs?**

We are still accountable

Practical:

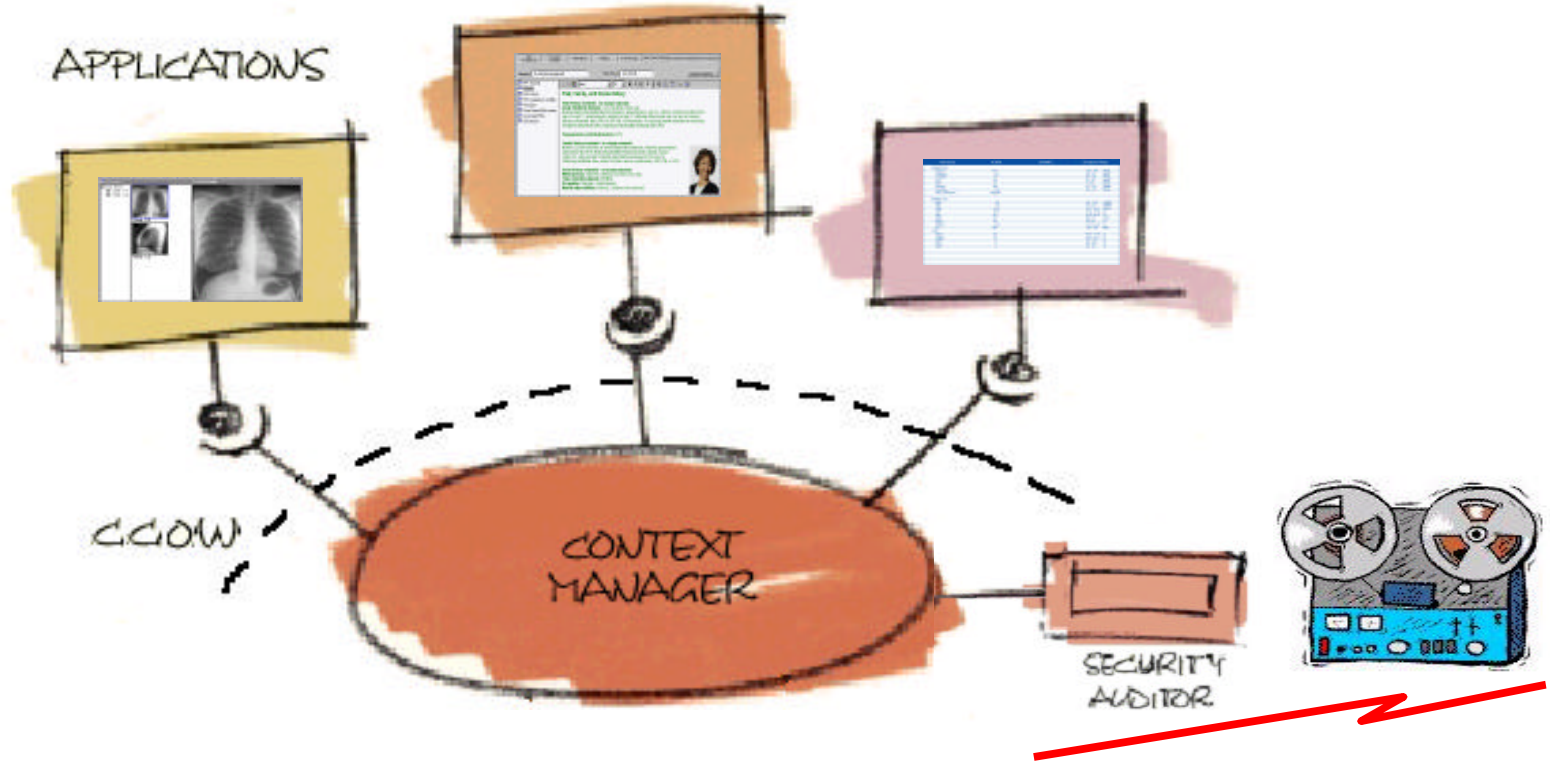
- **Infrastructure**
- **Compliance**
- **Data**

Standards-based

The Solution



- Vergence Privacy Auditor Sentillion:
 - Standards-based
 - Enterprise-wide
 - Vendor-neutral
- Supports vision of integrated desktop:
 - Single implementation
 - Centralized management
 - User-friendly / Vendor-friendly
- Flexible reports



The Rationale



- Fundamental HIPAA requirement
- Mitigates high risk
- Simplifies analysis, implementation
- Minimizes development
- Supports IT vision

The Results



- Cost-effective
- Reasonable approach
- Single, centralized solution
- Rapidly deployed
- Flexible



Strategic Approaches to HIPAA Access & Audit

Discussion

Mariann Yeager

561.913.1588 cel
myeager@emersonsg.com
www.emersonsg.com