

# HIPAA IMPLEMENTATION AT THE ACADEMIC MEDICAL CENTER... concurrent session 3.04, March 28, 2002

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# University of Miami/Jackson Memorial Medical Center



March 28, 2003

**Jackson**  
HEALTH SYSTEM



# Jackson Health System

- ◆ The hub of a county-wide health system
- ◆ Single standard of care
- ◆ Cares for anyone regardless of the ability to pay: Safety Net
- ◆ Jackson Memorial Hospital: 1500 beds
- ◆ Jackson South (Community Hospital)
- ◆ Network of primary care centers

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Correctional Health Services

Jackson  
HEALTH SYSTEM



# University of Miami School of Medicine



[UM Home](#)

[President Donna E. Shalala](#)

**President Shalala  
in the News**

[President Shalala's Biography](#) [Photo Gallery](#) [University Mission Statement](#)  
[Board of Trustees](#) [Suggestions and Comments](#) [Welcome Back Students for 2003](#)

["Shalala: No. 1 Fan" - Sun Sentinel from December 31, 2002](#)

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# President Shalala

## BIOGRAPHY AT-A-GLANCE CAREER HIGHLIGHTS

2001- President, University of Miami

1993-2001 Secretary, U.S. Department of Health and Human Services

1987-1993 Chancellor, University of Wisconsin - Madison

1980-1987 President, Hunter College of the City University of New York

1977-1980 Assistant Secretary for Policy Development and Research, U.S. Department of Housing and Urban Development



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1975-1977 Director and Treasurer of the Municipal Assistance Corporation for the City of New York

<http://privacy.med.miami.edu/>

#### HIPAA FINAL SECURITY RULE ISSUED, TRANSACTIONS AND CODE SETS RULE MODIFIED

The US Department of Health and Human Services released the final version of the HIPAA Security Rule, published in the Federal Register of 20 February. It also issued modifications to the Transactions and Code Sets Rule.

- [read more](#) about these releases
- view the current [compliance calendar](#)

#### HIPAA PRIVACY RULE REVISIONS

DHHS released a revision of the HIPAA Privacy Rule on 14 August, the last before that Rule's compliance date.

- [read more](#) about these latest changes

#### TEST YOUR "HEALTH PRIVACY IQ"

Think you know how to behave in a post-HIPAA world? Take a quiz about:

- [general quiz](#)
- around the office: [paper records](#), telephone and fax use (coming soon)
- at the computer: electronic records, electronic mail, portable and wireless devices (coming soon)
- [fundraising](#), [marketing](#) and [research](#) uses of health information

#### LEARN FROM OTHERS' MISTAKES

Read a story from "the real world" -- and learn what NOT to do:

- [Allentown PA](#) paper medical files dropped on a city street
- [Indianapolis IN](#) electronic medical records found on computer in a thrift store
- [Missoula MT](#) kids' psychological files put on a public web site

[Rapid City SD](#) psychiatric files abandoned in a convenience store trash can

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# Public – Private Partnership

- ◆ Physicians
- ◆ Patients
- ◆ Flow of information
- ◆ Types of Information...TPO

# Academic Medical Centers (AMC's)

## ◆ Tripartite Mission

◆ Education

◆ Research

◆ Patient Care

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# Sustainability of AMCs

- ◆ Changing healthcare environment
- ◆ Changes in healthcare financing
- ◆ Changes in healthcare regulations

# Unique Challenges for AMC's

- ◆ History
- ◆ Governance
- ◆ Constituent Base
- ◆ Position in Society

## **RESULT IN...**

- ◆ Successful Changes
- ◆ Unique Barriers

# Advantages for AMC's *(As a HIPAA Leader)*

- ◆ Well educated, hard working membership
- ◆ Traditionally innovators in healthcare
- ◆ Strong technology and innovators in healthcare
- ◆ Active role in national health policy

# Unique Barriers to HIPAA

## ◆ **Complex organizations & governance structures**

- ◆ Multiple entities
- ◆ Unclear or non-existent reporting lines
- ◆ Governed by boards with a variable level of understanding of medical center issues

# Barriers

## ◆ **University Affiliation**

- ◆ Decentralized organizations, inability to act quickly, decisions by committee
- ◆ Academic culture tends to reward individual vs. organizational action
- ◆ Non employee system users (students)
- ◆ Often beholden to central university administration

# Barriers

- ◆ Multiple missions
- ◆ Confusion and disagreement about priorities
- ◆ Cross-subsidization

# Legal Issues

- ◆ OCHA
- ◆ Sunshine
- ◆ Two Legal Counsel
- ◆ Sovereign Immunity
- ◆ Deep Pocket \$\$\$

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# HIPAA Organization

- ◆ Joint Process
- ◆ UM Process
- ◆ JHS Process

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# JHS Mission

- ◆ Patient Care
- ◆ Education
- ◆ Research
- ◆ Partner to UM
- ◆ Beholden to the community & county commission

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# UM Mission



- ◆ Education
- ◆ Research
- ◆ Patient Care
- ◆ Partner to JHS

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# UM/JHS Joint HIPAA Steering Committee

- ◆ Joint/common work for UM & JHS
- ◆ Membership
- ◆ Purpose

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# Joint/Collaborative Work

- ◆ Education
- ◆ Policies
- ◆ Privacy Notice
- ◆ PR/Media
- ◆ Patient Directories
- ◆ Security
- ◆ Research

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# Individual Work

- ◆ Policies and Procedures
- ◆ Transactions & Code Sets
- ◆ Business Associates
- ◆ Shredding

# Politics, Politics, Politics

- ◆ Makes the world go around
- ◆ Can be used for the common good!

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# Lessons Learned

- ◆ It isn't always smooth sailing
- ◆ It has to be done
- ◆ It is worth it!!!!
- ◆ Patients, entities and insitutional image benefit from efforts
- ◆ The privacy of patients is respected!

# Thank You

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