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

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Miami FL

University of Miami/Jackson Memorial Medical Center





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



University of Miami School of Medicine

SCHOOL OF MEDICINE





President Shalala

BIOGRAPHY AT-A-GLANCE CAREER HIGHLIGHTS

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

1987-1993Chancellor, 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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HEALTH SYSTEM

BIOETHICS PROGRAM **PRIVACY / DATA PROTECTION**

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 guiz about:

• general guiz

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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HEALTH SYSTEM

Public – Private Partnership

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



Academic Medical Centers (AMC's)





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 boars 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 \$\$\$



HIPAA Organization

Joint ProcessUM ProcessJHS Process



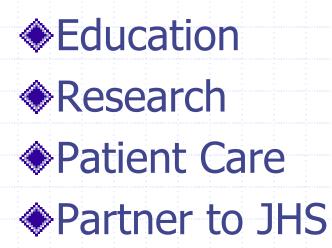
JHS Mission

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



UM Mission









UM/JHS Joint HIPAA Steering Committee

Joint/common work for UM & JHS Membership Purpose





Joint/Collaborative Work

Education Policies Privacy Notice PR/Media Patient Directories Security Research



Individual Work

Policies and Procedures
 Transactions & Code Sets
 Business Associates
 Shredding



Politics, Politics, Politics

Makes the world go aroundCan be used for the common good!





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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