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HIPAA Summit Audioconference

A Case Study in Employer HIPAA Privacy Compliance Approaches

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- Intel is “covered entity” under HIPAA regs by virtue of fact that it maintains a self-funded group health plan
- Cross-functional HIPAA privacy compliance team assembled in January 2002
 - Representatives from Benefits Design/Ops, Call Center, HRD, Occ Health, Gen. Acctg., HR Legal
 - Coordination with other corporate privacy initiatives (e.g., SSN)
 - Trained in basic “ins and outs” of HIPAA privacy

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- **First task: Root out all uses or disclosures of “individually identifiable health information” in company**
 - Accomplished via comprehensive information inventory conducted by team
- **Aggregate inventory subjected to two tests for classification purposes:**
 - **“Protected Health Info.” vs. Non-PHI**
 - LOA, STD/LTD, and “de-identified” or “summary health” items fell out as non-PHI
 - **“Treatment, Payment, H/C Ops” vs. Non-TPO**
 - All PHI items were TPO, which is good because TPO is favored and has fewer restrictions than non-TPO

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- **Major tasks remaining on road to compliance. . .**
 - **Internal guideline/procedure drafting for PHI uses and disclosures compiled in inventory**
 - Applying “minimum necessary” and proper safeguards
 - **Amendment of group health plan documents per Sec. 164.504(f) for plan sponsor access of PHI**
 - **Implementation of “business associate” (BA) agreements with outside suppliers**
 - Made easier by model language from HHS
 - Corp. Purchasing to negotiate provision into new/existing supplier contracts

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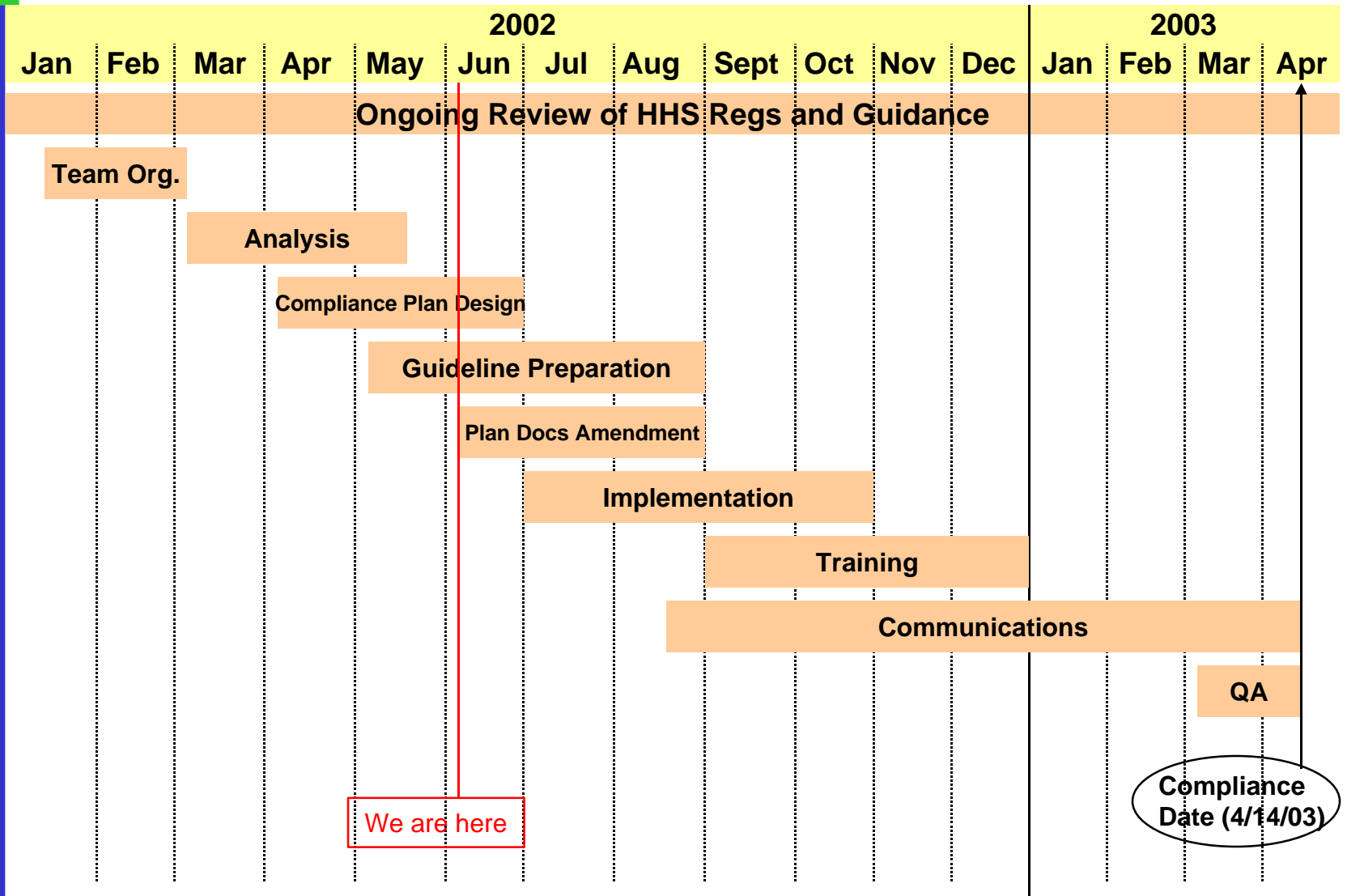
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- **Major tasks remaining on road to compliance** (*cont'd.*) . . .
 - **Internal PHI administrative structure creation**
 - Privacy official designation
 - Adoption of general grievance procedures, sanctions for violation of privacy policies, and mechanism for employees to exercise their rights under regs
 - **Execution of training and communication plans**
 - Training for Benefits Ops, Call Center
 - Privacy notice distribution; revision of employee handbook, Call Center scripting
 - **Quality Assurance**
 - Final review of all relevant HHS regs/guidance against compliance processes leading up to 4/14/03

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HIPAA Privacy Compliance Project

High Level Project Timeline



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