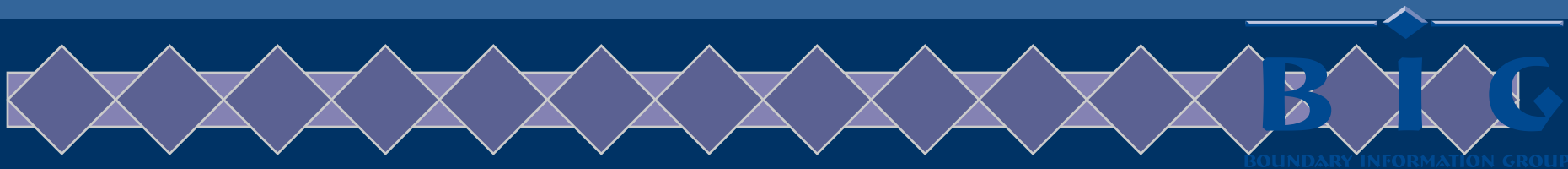


What to Do Now: Practical Initiatives in Implementing the Final Privacy Rule



Presented by:

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BOUNDARY INFORMATION GROUP



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- ◆ **Virtual Consortium of health care information systems consulting firms founded in 1995**
- ◆ **Internet-Based**
 - **Company website: www.boundary.net**
 - **BIG HIPAA Resources: www.hipaainfo.net**
- ◆ **Senior Consultants with HIPAA Leadership Experience Since 1992**
- ◆ **Clients include:**
 - **Hospitals and multi-hospital organizations**
 - **Medical groups**
 - **Health plans**
 - **Vendors**

Workgroup on Electronic Data Interchange



- ◆ **Nonprofit Trade Association, founded 1991**
- ◆ **213 organizational members**
 - **Consumers, Government, Mixed Payer/Providers, Payers, Providers, Standards Organizations, Vendors**
- ◆ **Named in 1996 HIPAA Legislation as an Advisor to the Secretary of DHHS**
- ◆ **Website: www.wedi.org**
- ◆ **Strategic National Implementation Process (SNIP) – snip.wedi.org**
- ◆ **WEDI Foundation formed in 2001**
- ◆ **Steven Lazarus, WEDI Chair**

Logical Sequence of Activities

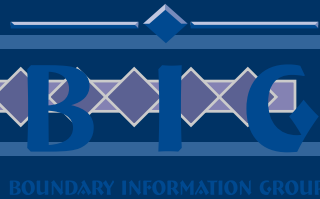


- ◆ **Complete gap analysis for Privacy and Security**
- ◆ **Identify Privacy State law issues**
- ◆ **Create/revise policies, procedures, and forms**
- ◆ **Approve policies, procedures and forms**
- ◆ **Health plan: revise and distribute Summary Plan Document (SPD)**
- ◆ **Increase workforce awareness**
- ◆ **Implement technology support**

Logical Sequence of Activities

- ◆ **Select training mode (and product)**
- ◆ **Train work force**
- ◆ **Test all forms**
- ◆ **Test all work flows**
- ◆ **Monitor incidents**

Address Administrative Issues



- ◆ **Chief Privacy Information Official designated**
- ◆ **Organized Health Care Arrangement (OCHA)**
- ◆ **Affiliated Covered Entities (common ownership or control)**
- ◆ **Business Associates**
 - **Create a complete list**
 - **Define standard language**
 - **Complete new contracts by April, 2003 and April, 2004**

Key Dates and Milestones



◆ September – October, 2002

- **Complete Privacy and Security Gap Analysis**
- **Develop/revise policies, procedures, and forms**
- **Designate Chief Privacy Information Official**
- **Identify technology to support Privacy and Security**
- **Develop budget and obtain approval for 2002 and 2003**
- **Increase HIPAA awareness**
- **Create a complete list of Business Associates**

Key Dates and Milestones



◆ November – December, 2002

- **Select training method for Privacy and Security**
- **Identify HIPAA training content options, including State issues**
- **Select HIPAA training options**
- **Approve all new policies, procedures and forms**
- **Create and approve new Business Associate contract language**

Key Dates and Milestones



◆ **January, 2003**

- **Implement Privacy and Security technology**
- **Set up training lessons and pilot them**

◆ **February – March, 2003**

- **Train existing workforce**
- **Test forms**
- **Pilot work flows**
- **Complete contracts with Business Associates who have no current agreement**

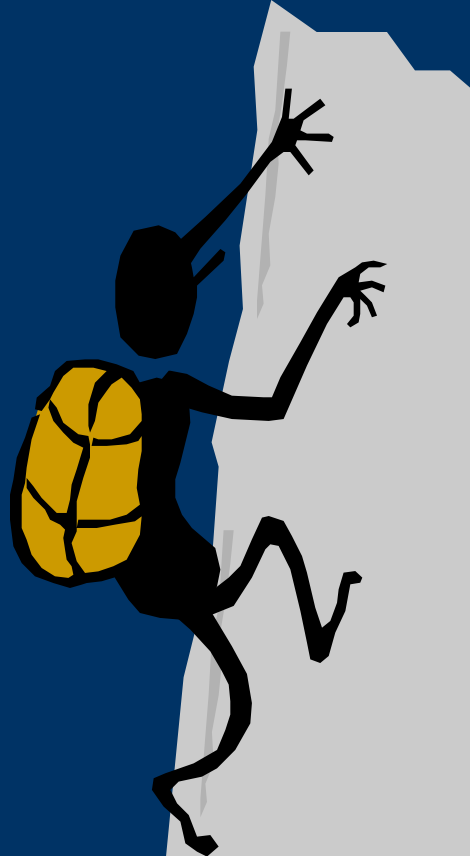
Key Dates and Milestones



◆ **By April 14, 2003**

- **Use new forms for all patients**
- **Train all new workforce members**
- **Answer patient questions**
- **Document full compliance with Chief Privacy Information Official or Compliance Officer**
- **Implement incident reporting and monitoring**

HIPAA READINESS



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