

CMS HIPAA Transaction Implementation Status Checklist

An Overview



GAO Project Phases

- Awareness
- Assessment
- Remediation
- Validation
- Implementation



Purpose of Risk Assessment Checklist

- Help gauge where States are in the overall picture of HIPAA implementation
- Establish a barometer of progress; highlighting work still needing to be accomplished
- Allows States to gauge the level of risk associated with the implementation of the required EDI standard transactions
- Allow better focus of organization efforts in the time remaining until Oct. 16, 2003



How is Checklist Used

- Contains key questions about critical project activities
- Answered “Yes” or “No”
- “Yes” if accomplished or if adequate planning and resources for future efforts are in place
- “No” answers should be reviewed
- Decide if “No’s” should be included in risk analysis, if not, why not
- Companion to Privacy Project Checklist



Checklist Users

- Intended to be used by the HIPAA Coordinator, HIPAA Project Lead, or other key agency representative in the State, Medicaid agency, or other agency

NOTE: Use of the checklist is voluntary

Checklist Organization

Checklist Part	Project Activity
Part A – HIPAA Project Office, Budgets, Resources, Contracts and Plans	State and HIPAA Project Office Organization and Structure
Part B – Definition of Covered Entity Status	
Part A – HIPAA Project Office, Budgets, Resources, Contracts and Plans	Planning and Coordination
Part B – Definition of Covered Entity Status	
Part C – Coordination of State Medicaid (or Other Agency) Enterprise	
Part J – Contingency Planning	
Part D – Impact on Medicaid (or Other Agency) Business Processes	Assessment of HIPAA Impact on Business and Systems
Part E – System Impact Assessment	
Part F – Design of System and Business Process Changes	System Renovation and Process Changes
Part G – System Renovation	
Part H – Validation and Testing	Testing
Part I – Implementation and Transition	Implementation and Transition



Checklist Part Descriptions

- Part A - HIPAA Project Office, Budgets, Resources, Contracts and Plans
 - What has been done to establish a HIPAA project office, acquire resources and establish a project schedule?
- Part B - Definition of Covered Entity Status
 - What has been done to determine who is covered by the Transaction Rule within the Medicaid enterprise?



Checklist Part Descriptions

- Part C - Coordination of State Medicaid (or Other Agency) Enterprise
 - What has been done to communicate expectations to business associates and trading partners, including agreement modifications?
- Part D - Impact on Medicaid (or Other Agency) Business Processes
 - What has been done to deal with the certain impact the Rule will have on Medicaid business processes?



Checklist Part Descriptions

- Part E - System Impact Assessment
 - What has been done to deal with the certain impact the Rule will have on Medicaid information systems?
- Part F - Design of System and Business Process Changes
 - What is the solution and how will it be implemented?



Checklist Part Descriptions

- Part G - System Renovation
 - What has been done to assure that system renovation will be successful?
- Part H - Validation and Testing
 - What are your test plans, which partners will testing include, and how will you know if testing is adequate to ensure a successful transition?



Checklist Part Descriptions

- Part I - Implementation and Transition
 - After renovation and testing have been completed, how will you move from the current way of doing business to processing HIPAA compliant transaction?
- Part J - Contingency Planning
 - What problems do you foresee and how will you deal with them?



Checklist Automation

- Paper version converted to Excel
- Provides immediate feedback
- Facilitates estimation of risk level
- Three sections:
 - Instructions, Data Entry, and Results



Using the Automated Checklist Tool

- Instruction Screen
- Data Input Screen
- Checklist Attributes
- Weights and Scoring
- Results Screen

Data Input Screen

Part A – HIPAA Project Office, Budgets, Resources, Contracts, and Plans

1.0 HIPAA Project Office (HPO) Established

Is an HPO established?	<input type="checkbox"/> YES <input type="checkbox"/> NO
Does the HPO have a written charter and a defined role?	<input type="checkbox"/> YES <input type="checkbox"/> NO
Does the HPO have support at the highest State executive levels?	<input type="checkbox"/> YES <input type="checkbox"/> NO
Is there a current Organization chart and Charter document?	<input type="checkbox"/> YES <input type="checkbox"/> NO

2.0 HIPAA Budgets, Resources, And Contracts

Are the HIPAA budget requirements known in detail?	<input type="checkbox"/> YES <input type="checkbox"/> NO
Are the needed APDs submitted and approved for HIPAA?	<input type="checkbox"/> YES <input type="checkbox"/> NO
Is there a resource plan?	<input type="checkbox"/> YES <input type="checkbox"/> NO
Are the staffing requirements assessed for the entire project?	<input type="checkbox"/> YES <input type="checkbox"/> NO
Are staffing resources available when needed?	<input type="checkbox"/> YES <input type="checkbox"/> NO
Does the HPO have a firm commitment of resources and staff to meet the requirements?	<input type="checkbox"/> YES <input type="checkbox"/> NO
Are all necessary RFPs for resources and staff completed?	<input type="checkbox"/> YES <input type="checkbox"/> NO
Are contracts in place for additional resources and staff?	<input type="checkbox"/> YES <input type="checkbox"/> NO
Are contracts in place for needed software (translators, for example)?	<input type="checkbox"/> YES <input type="checkbox"/> NO
Are other needed services and support contracts in place?	<input type="checkbox"/> YES <input type="checkbox"/> NO

Data Input Screen

Part A – HIPAA Project Office, Budgets, Resources, Contracts, and Plans

1.0 HIPAA Project Office (HPO) Established

Is an HPO established?	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO
Does the HPO have a written charter and a defined role?	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO
Does the HPO have support at the highest State executive levels?	<input type="checkbox"/> YES	<input checked="" type="checkbox"/> NO
Is there a current Organization chart and Charter document?	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO

2.0 HIPAA Budgets, Resources, And Contracts

Are the HIPAA budget requirements known in detail?	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO
Are the needed APDs submitted and approved for HIPAA?	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO
Is there a resource plan?	<input type="checkbox"/> YES	<input checked="" type="checkbox"/> NO
Are the staffing requirements assessed for the entire project?	<input type="checkbox"/> YES	<input checked="" type="checkbox"/> NO
Are staffing resources available when needed?	<input type="checkbox"/> YES	<input checked="" type="checkbox"/> NO
Does the HPO have a firm commitment of resources and staff to meet the requirements?	<input type="checkbox"/> YES	<input checked="" type="checkbox"/> NO
Are all necessary RFPs for resources and staff completed?	<input type="checkbox"/> YES	<input checked="" type="checkbox"/> NO
Are contracts in place for additional resources and staff?	<input type="checkbox"/> YES	<input checked="" type="checkbox"/> NO
Are contracts in place for needed software (translators, for example)?	<input type="checkbox"/> YES	<input checked="" type="checkbox"/> NO
Are other needed services and support contracts in place?	<input type="checkbox"/> YES	<input checked="" type="checkbox"/> NO

Data Input Screen

Part A – HIPAA Project Office, Budgets, Resources, Contracts, and Plans

<i>1.0 HIPAA Project Office (HPO) Established</i>	
Is an HPO established?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
Does the HPO have a written charter and a defined role?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
Does the HPO have support at the highest State executive levels?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
Is there a current Organization chart and Charter document?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
<i>2.0 HIPAA Budgets, Resources, And Contracts</i>	
Are the HIPAA budget requirements known in detail?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
Are the needed APDs submitted and approved for HIPAA?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
Is there a resource plan?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
Are the staffing requirements assessed for the entire project?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
Are staffing resources available when needed?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
Does the HPO have a firm commitment of resources and staff to meet the requirements?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
Are all necessary RFPs for resources and staff completed?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
Are contracts in place for additional resources and staff?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
Are contracts in place for needed software (translators, for example)?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
Are other needed services and support contracts in place?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO



Checklist Attributes

- Default response to all questions = “NO”
- Questions need not be answered in any particular order
- Responses are not locked, and can be changed at any time
- Results are calculated dynamically
- Part “tab” color indicates risk level (Red, Yellow, or Green)



Weights and Scoring

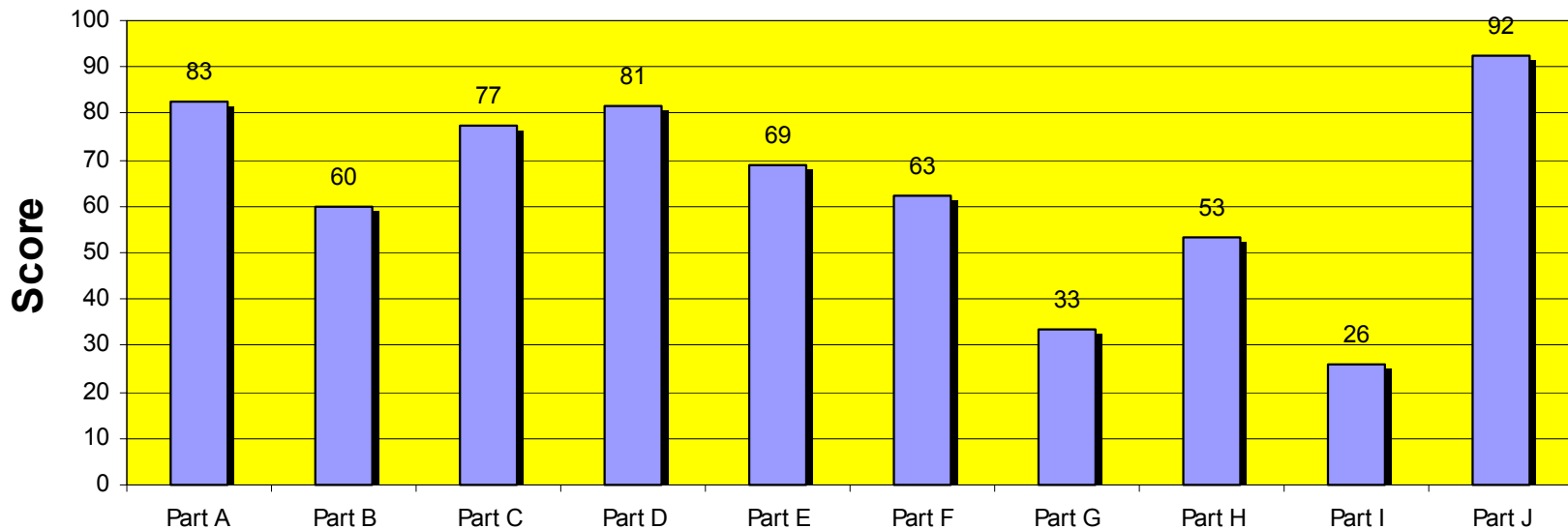
- Each individual question is assigned a weighting factor of 1, 2, or 3 based on its relative importance to the success of the overall project
- Each part's risk value (A-J) is calculated independently
- The overall score is determined by averaging the independent values from all parts

Results Screen

Overall Self Assessment Score Is:

64

Scores by Section





Results Screen

Risk by Section		
Part A	HIPAA Project Office, Budgets, Resources, Contracts, and Plans	Green
Part B	Definition of Covered Entity Status	Yellow
Part C	Coordination of State Medicaid (or Other Agency) Enterprise	Yellow
Part D	Impact on Medicaid (or Other Agency) Business Processes	Green
Part E	System Impact Assessment	Yellow
Part F	Design of System and Business Process Changes	Yellow
Part G	System Renovation	Red
Part H	Validation and Testing	Red
Part I	Implementation and Transition	Red
Part J	Contingency Planning	Green



Risk Interpretation

- Score of 80 and above = GREEN
 - Low risk
- Score of 60 – 79 = YELLOW
 - Medium risk
- Score of 59 and below = RED
 - High risk



Risk Interpretation

- GREEN
 - All or most of the key points in the checklist have been considered
 - Risk is relatively low
- YELLOW or RED
 - A significant number of key points have not been considered
 - Carefully examine each “NO” response
 - Risk is moderate to high
 - Risk Management may become a critical activity



Disclaimer

- Developed by SMEs and refined through a review process that included several States and the CMS Central Office; local applicability may vary
- A tool to be used for self-assessment
- Risk thresholds are arbitrary
- Not scientifically calibrated
- Intended to give a general impression