

Approaches to Compliance with the HIPAA Privacy and Security Workforce Training Requirements



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**
- ◆ **190 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 Past Chair and Foundation Trustee**

Workforce Definition



- ◆ **Workforce means employees, volunteers, trainees, and other persons whose conduct, in the performance of work for a covered entity, is under the direct control of such entity, whether or not they are paid by the covered entity.**

Achieving Effective Privacy and Security



- ◆ **Need good Security to achieve Privacy**
- ◆ **Privacy Regulation requires Security**
- ◆ **Reminders, periodic training, and “breach monitoring” reporting and management will be needed to achieve effective Privacy**
- ◆ **Need to train the workforce on the organization’s policies and procedures for Privacy and Security**

Training Issues and Options

- ◆ **Define workforce categories**
 - **Few workforce categories**
 - **Easy to administer**
 - **Assign workforce to courses**
 - **Less customization to create and maintain**
 - **Many workforce categories**
 - **May be difficult to administer**
 - **Complex management of workforce to training content choices**
 - **Potential to highly customize content to workforce categories**

Training Issues and Options

– Practical Issues

- **Identify source of workforce lists, identifications and passwords**
- **Include employees, physicians, volunteers, long-term contract renewal (e.g., Medical Director in a health plan)**
- **Use Human Resource application if capable**
 - **Names**
 - **Job categories**
 - **Identifications and passwords from another source**
- **Keep passwords and identifications secure**

Training Issues and Options



◆ Tests

- **Use to document learning for compliance**
- **Set passing score**
- **Consider Continuing Education credits (can not change content significantly and maintain credits)**

Training Issues and Options



◆ Training Options

– In person – classroom

- Can customize
- Questions and answers addressed by trainer
- Difficult to schedule for new workforce members
- Can use paper or automated testing

Training Issues and Options



- Video or Workbooks**
 - Can not customize**
 - No questions and answers**
 - Need VCRs and/or supply of Workbooks**

Training Issues and Options



- E Learning

- May be able to customize**
- Limited questions and answers**
- Flexible schedule for training for current and new workforce**
- Can integrate training with organization's policies and procedures**
- There may be technological barriers depending on delivery mode**
- Automated testing and learning reinforcement**

Training Cost

◆ **Cost/Budget**

– **Product**

- **Fixed price**
- **Per course per person**
- **Maintenance**

– **Customized setup**

- **Policies and Procedures**
- **State Law pre-emption for Privacy**
- **CEs**
- **Assign courses to individuals**

Training Cost



- Workforce training time**
 - **Salaries and benefits**
 - **CE offset**
- CE value/budget**
- Technology**
 - **Several VCRs, monitors, and rooms, website**
 - **Support – internal and external**
- Administrative**
 - **Record keeping**
 - **Management**

Setup Issues



- ◆ **Setup Time and Resources**
 - **Assignment of internal staff/outsource**
 - **Initially may require dedicated staff, rooms, and equipment**
- ◆ **Pilot Training**
 - **Evaluate learning**

HIPAA READINESS

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Company website: www.boundary.net

HIPAA website: www.hipaainfo.net

HIPAA training: www.trainforhipaa.com

HIPAA Regulations and Policies and

Procedures: www.hipaahelper.ent

