COMPLIeNT™

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COMPLIANCE

HIPAA & TRAINING

Web-Based Strategies for Compliance

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HIPAA Training Requirements

Two Of The Proposed Regulations Specifically Require Training:

- Privacy (section 164.518)
- Security and Electronic Signatures
(section 142.308)

HIPAA Training Requirements Privacy

Who Must Be Trained:

- All members of an entity's workforce who, by virtue of their position, are **likely** to obtain **access** to protected health information

  - Employees

  - Volunteers

  - Trainees

  - Others under direct control of persons working on behalf of covered entity, but not a business partner

HIPAA Training Requirements
Privacy

Who Must Be Trained: (continued)

- While training of Business Partner workforces is not specifically mandated, covered entities are required to ensure that Business Partners have appropriate "safeguards" in place for protected health information.

HIPAA Training Requirements Privacy

What Must The Training Include?

- The workforce must receive training on an entity's policies and procedures relating to protected health information.

HIPAA Training Requirements Privacy

When Is The Training To Be Completed?

- The entire affected workforce must have received training by the date on which the regulations become effective.

- New members of the workforce must be trained "within a reasonable period."

HIPAA Training Requirements Privacy

When Is The Training To Be Completed? (continued)

- Members of the workforce who are affected by any material changes in the privacy policies and procedures must be retrained in those changes. The proposed regulation is silent as to how promptly this retraining must be accomplished.

HIPAA Training Requirements Privacy

When Are Certifications Required?

- Each trained member of the workforce must sign a statement certifying:

    - Date of training; and

    - Willingness to honor the privacy policies and procedures

- Every three years each member of the workforce must re-certify.

HIPPA Training Requirements Security

The proposed Security and Electronic Signature rule under section 142.308(12) requires security training regarding the vulnerabilities of the health information in an entity's possession and procedures, which must be followed to ensure the protection of that information.

HIPAA Training Requirements Security

The Implementation Features Required Are As Follows:

- Awareness training for all personnel, including management, agents and contractors

- Based on job responsibilities, customized education programs that focus on issues regarding use of health information and responsibilities regarding confidentiality and security

HIPAA Training Requirements Security

The Implementation Features Required Are As Follows: (continued)

- Periodic security reminders

- User education concerning virus protection

- User education in importance of monitoring login success/failure, and how to report discrepancies

- User education in password management

HIPAA Training Requirements Security

Awareness Training:

- Required for all personnel, including management personnel, agents and contractors

- Security awareness is defined as -- but not limited to -- password maintenance , incident reporting and viruses and other forms of malicious software

HIPAA Training Requirements Security

Customized Training:

- Based on job responsibility, customized education that focuses on the use of health information and responsibilities regarding confidentiality.

- This area also includes education on physical safeguards (i.e. verifying access authorizations to health information, maintenance of records, "need-to-know" procedures, secure workstation areas)

HIPAA Training Requirements Security

Periodic Security Reminders:

- Employees, agents and contractors are made aware of security concerns on an ongoing basis.

HIPAA Training Requirements Security

Virus Protection:

- Training relative to user awareness of the potential harm that can be caused by a virus, how to prevent the introduction of a virus to a computer system and what to do if a virus is detected.

HIPAA Training Requirements Security

Login Success/Failure

- User education in the importance of monitoring log-in success or failure and how to report discrepancies

- Training in the user's responsibility to ensure the security of health care information
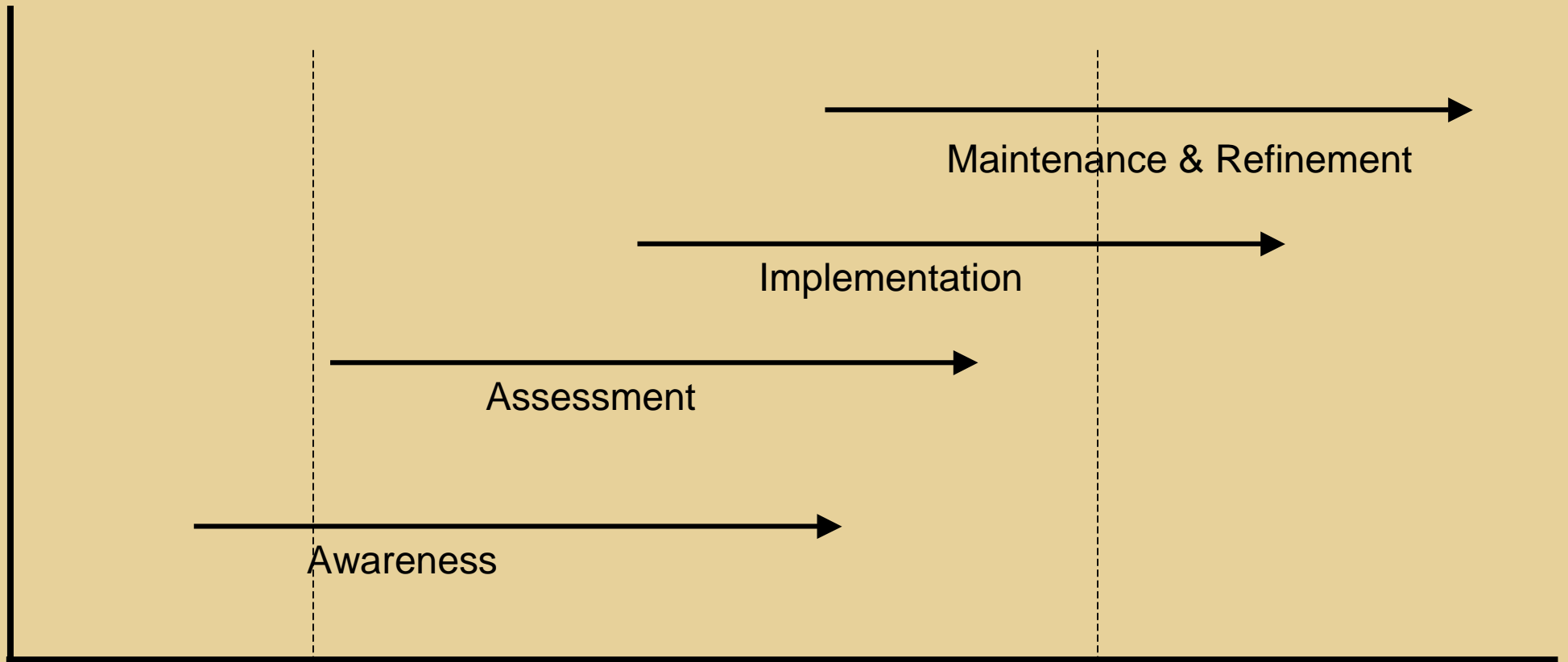
HIPAA Training Requirements Security

Password Management:

    - User education in password management.

    - Rules to be followed in creating and changing passwords and the need to keep them confidential.
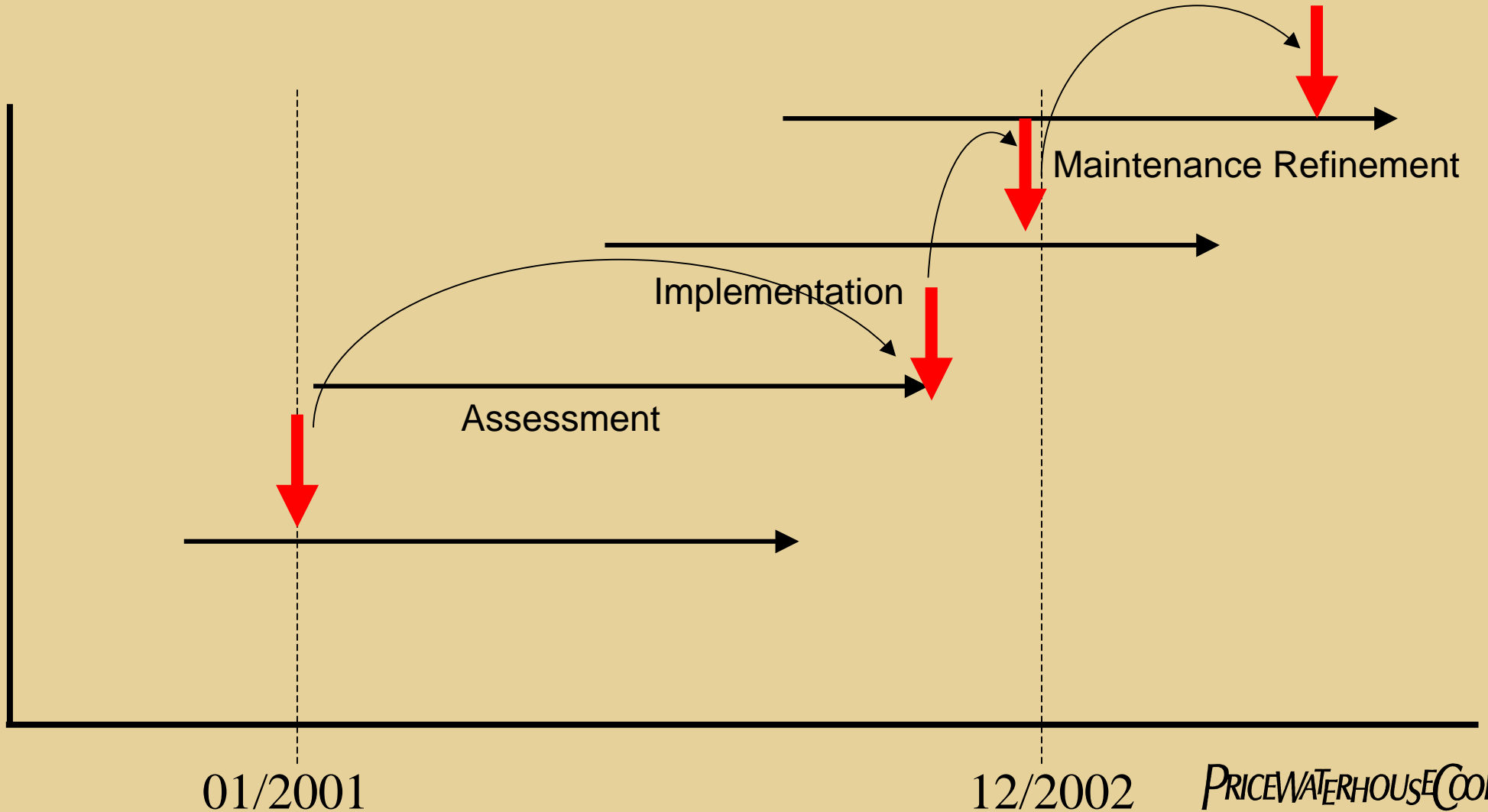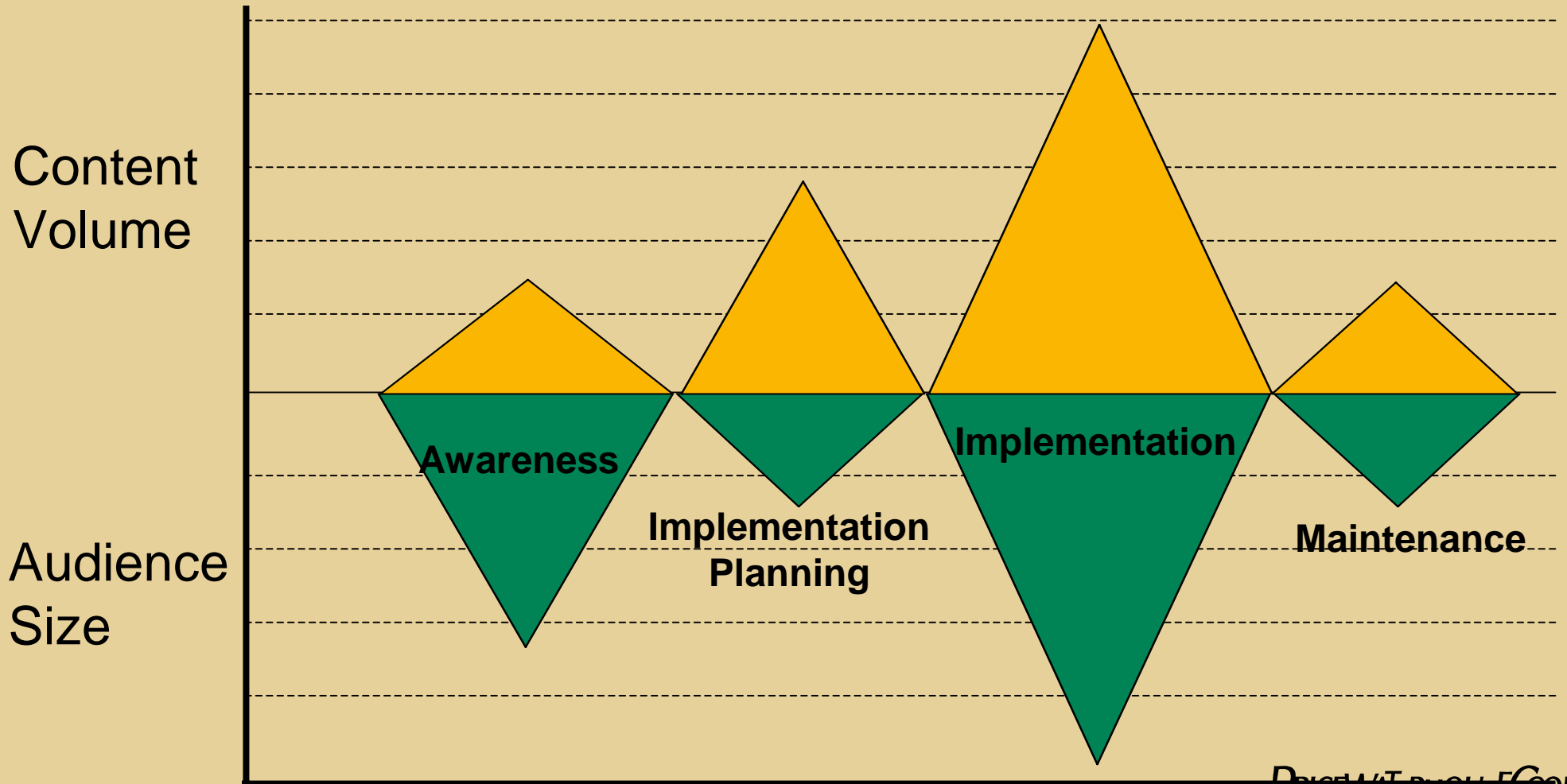
ROLLING HIPAA OUT

Maintenance & Refinement

Implementation

Assessment

Awareness

01/2001   12/2002

EDUCATION IN A HIPAA ROLLOUT

Maintenance Refinement

Implementation

Assessment

01/2001

12/2002

HIPAA EDUCATION CHALLENGES

Content
Volume

Audience
Size

Awareness

**Implementation
Planning**

Implementation

Maintenance

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ISSUES/CHALLENGES/REQUIREMENTS

Issue	Challenge	Requirement
Content	→ Volume Detail Customized Consistency	Central Management Content
Logistics	→ Large Audiences Dispersed Audiences Diverse Audiences Limited Availability	Local Management Delivery
Costs	→ Direct Costs – including Content Development Delivery Indirect – including time lost from work travel and lost productivity	Scalable, Flexible Infrastructure
Management	→ Process Definition evolving content and audience turnover	Flexible Content & Repository Tracking
Reporting	→ To Senior Management – status/effectiveness/cost To Regulatory Agency – status/compliance/incidents From Partners and Suppliers – status/compliance/incidents	Robust Reporting Functionality
Measurable Effects	→ Reduced costs percentage compliance Reduced incidents Greater operating efficiency	Enterprise Systems Orientation Business Planning Robust Reporting Tools

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TYPICAL e-LEARNING CAPABILITIES

Requirement Management	Education	Limited Reporting

ISSUES/CHALLENGES/REQUIREMENTS

Content ⟶ Volume

Detail
Customized
Consistency

Central Management Content

Logistics

Large Audiences
Dispersed Audiences
Diverse Audiences
Limited Availability

Local Management Delivery

Costs

Direct Costs – including Content Development Delivery

Indirect – including time lost from work
travel and lost productivity

Scalable, Flexible Infrastructure

Management ⟶ Process Definition evolving content and audience turnover

Flexible Content &
Repository Tracking

Reporting ⟶ To Senior Management   – status/effectiveness/cost
To Regulatory Agency   – status/compliance/incidents
From Partners and Suppliers – status/compliance/incidents

Robust Reporting Functionality

Measurable Effects ⟶ Reduced costs percentage compliance
Reduced incidents
Greater operating efficiency

Enterprise Systems Orientation
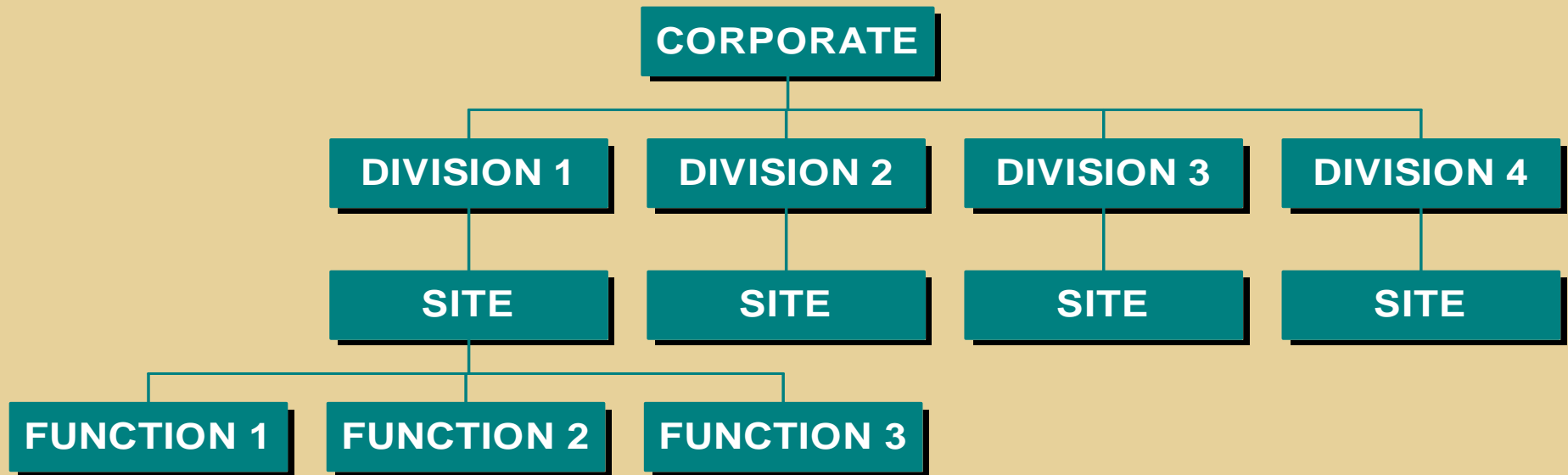Business Planning
Robust Reporting Tools

e-LEARNING CAPABILITIES IN A COMPLIANCE MANAGEMENT ENVIRONMENT
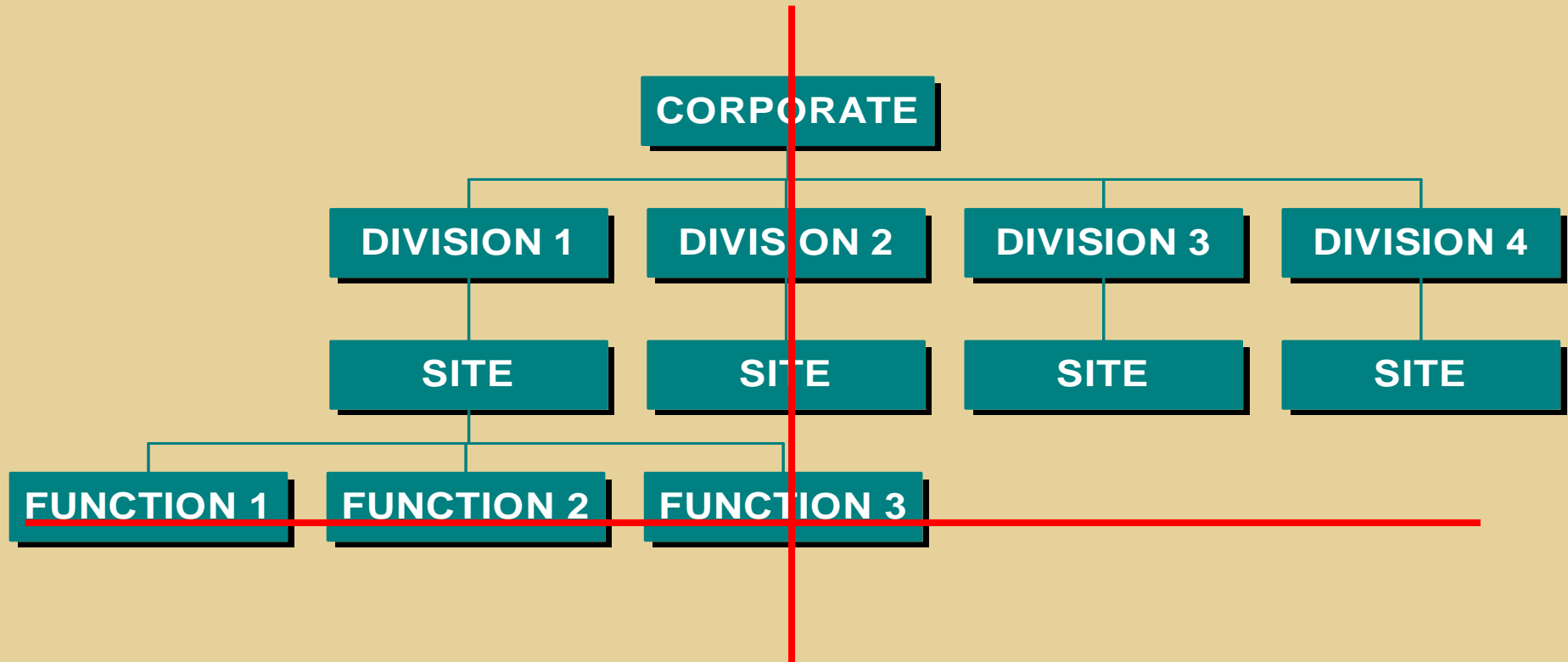
INCIDENT MANAGEMENT							
Organization Modeling	Audience Definition	Requirement Management	Expert Systems	Policies Plans Procedures	Knowledge Management	Education	Record Keeping & Follow-up
INCIDENT MANAGEMENT							

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MODELING YOUR ORGANIZATION

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MODELING YOUR ORGANIZATION

PriceWaterhouseCoopers

MANAGING CONTENT

Overview

Concept

Detailed concept

Reference

Application

Information

F1   F2   F3   F4

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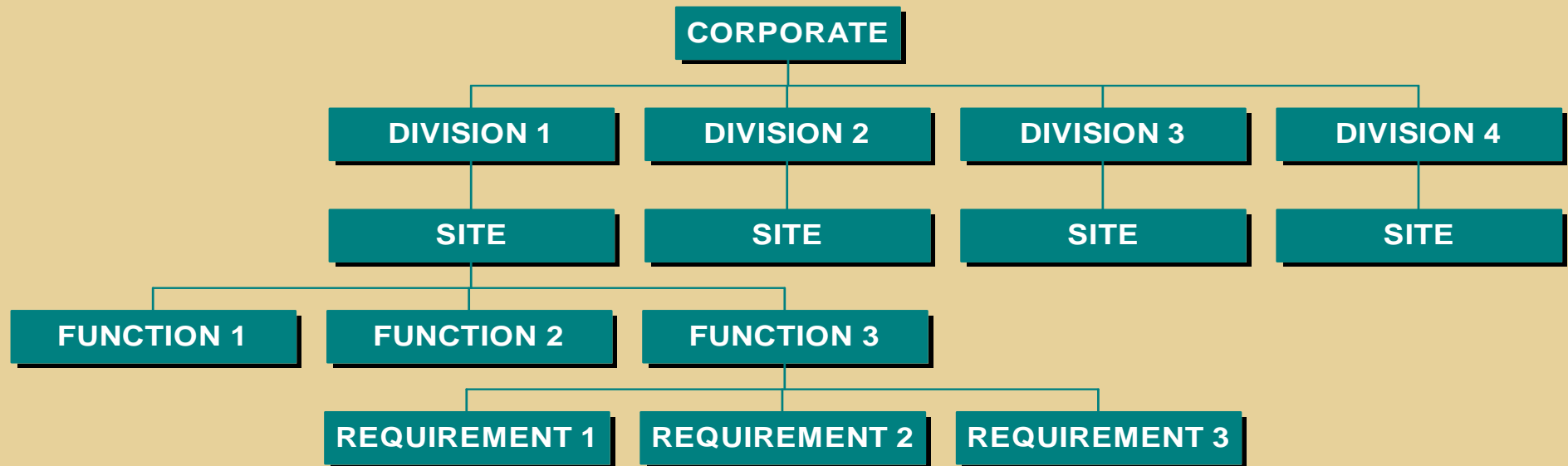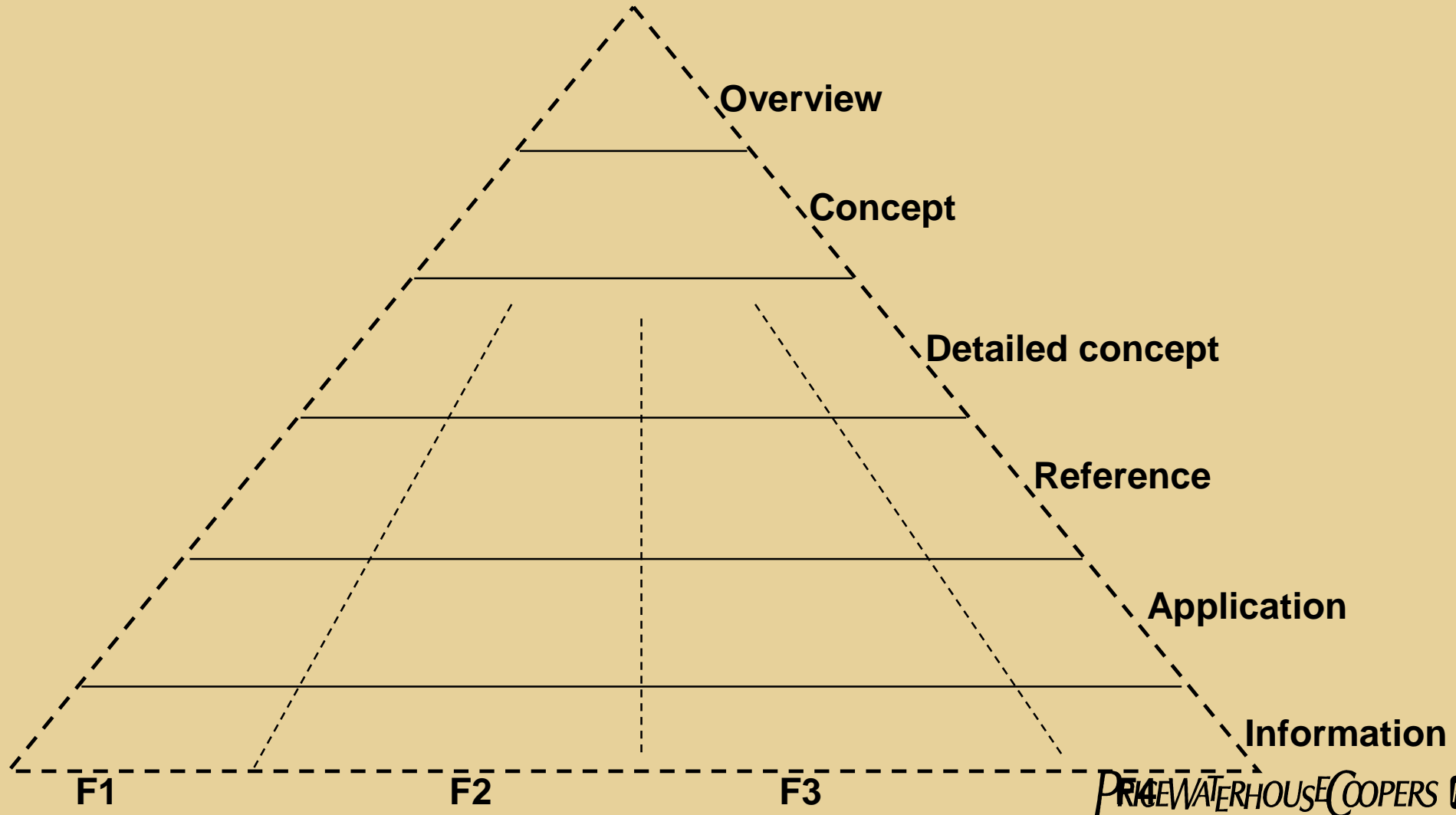
ASSEMBLING CONTENT

	Function	Function	Function	Function
Level	✔			
Level			✔	
Level				
Level				

✔ Task Resp #1

✔ Task Resp #2

TRACKING & REQUIREMENTS

Administration → **Requirements** → **Assembly** → **Audience**

Track, Automated, Follow-up & Report
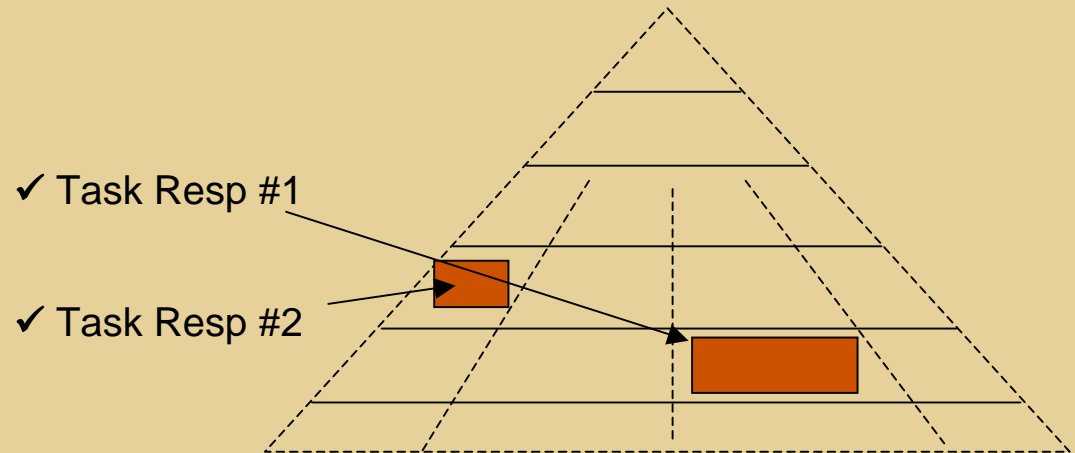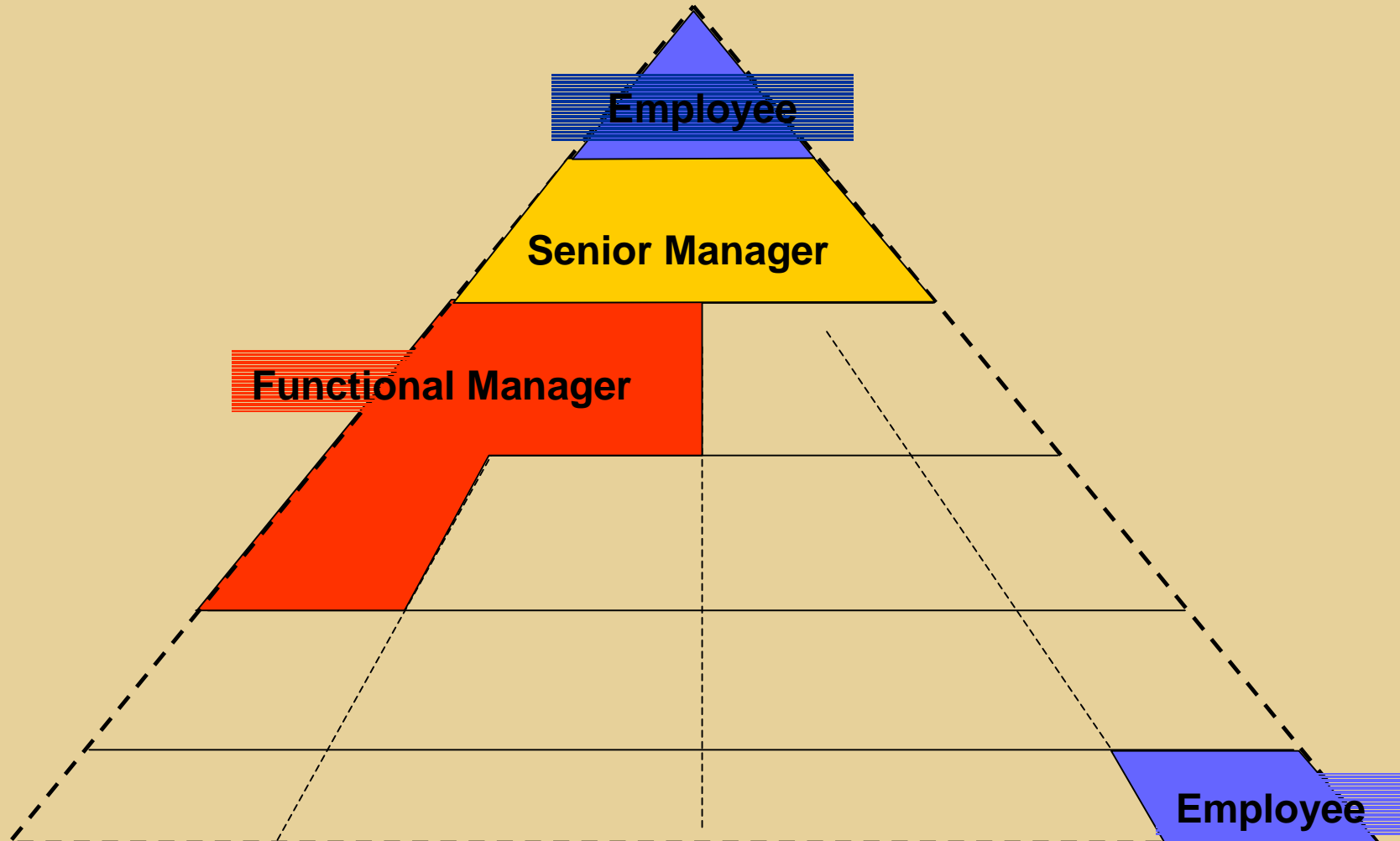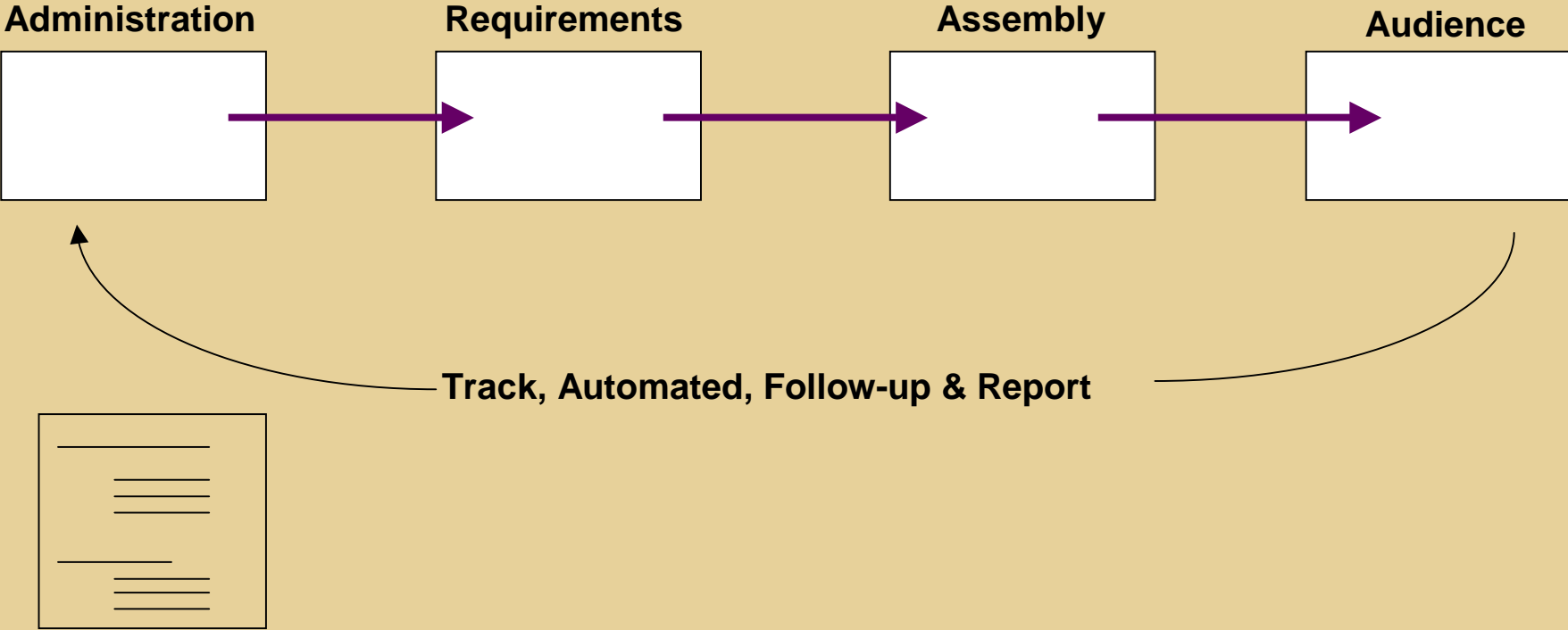
MAINTENANCE

- Ongoing Knowledge Management

- Tracking

- Reporting

- Incident Management

ISSUES/CHALLENGES/REQUIREMENTS

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EDUCATION IN A HIPAA ROLLOUT

Maintenance Refinement

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