

HIPAA Implementation Strategies

**Health Plan Case Studies:
Plotting the Course for Privacy Compliance**

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Who we are

Premera Blue Cross is a regional health plan with more than 1 million members in Washington and Alaska. It is the largest health plan in Washington. The PREMERA family of companies also offers a health plan in Oregon.



Strategy #1

Balance multiple requirements





Premera's Privacy Universe

HIPAA:

- Protected Health Information
- Minimum Necessary
- Policies and Procedures
- Business Associates
- Notices of Information Practices
- Right to Limit Use/Disclosure
- Right to Access and Amendment
- Right to Accounting
- Privacy Official
- Training
- Safeguards
- Sanctions
- Complaints

Premera's Privacy Universe

In addition to HIPAA...

- State Patient Bills of Rights



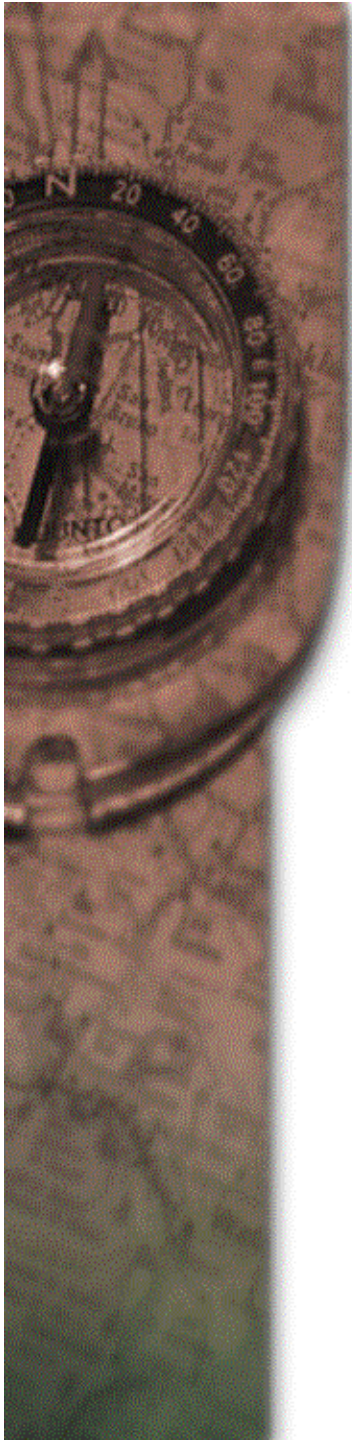
- Key Provisions
- Deadline July 1, 2001



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- Key Provisions
- In Effect



Premera's Privacy Universe

Gramm-Leach-Bliley Act

- Covers Personal Financial Information (PFI)
- Applies to
 - Banks
 - Brokerage Houses
 - Insurance Companies





Balancing PBR / GLB / HIPAA

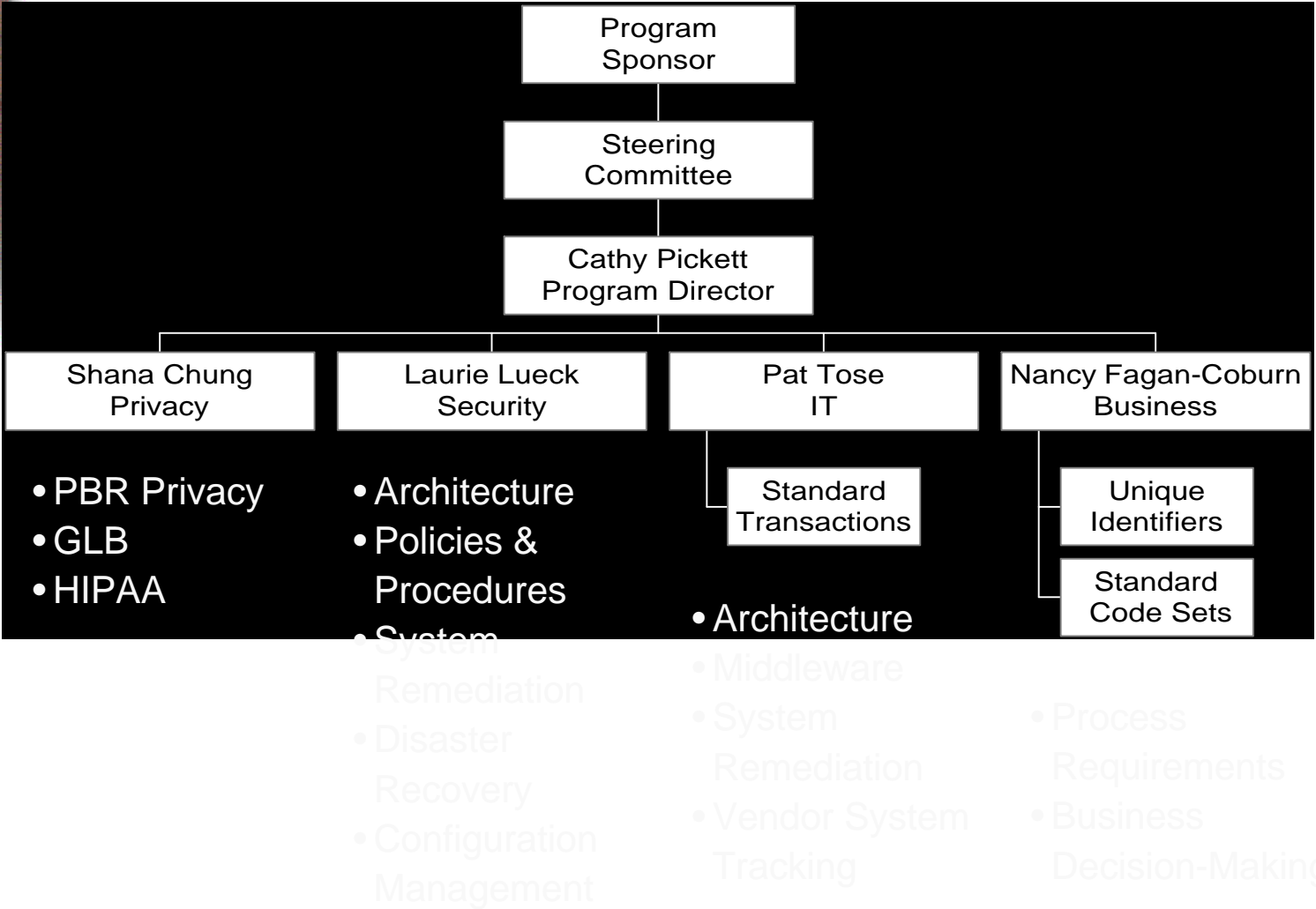
- Some economies of scale
 - Similar intents & motivations
 - Different areas of focus
- Using “Personal Protected Information” to cover PFI, IIHI, PHI, PPHI
 - Operational simplicity
 - Most stringent standards
 - Guarantees compliance

Strategy #2

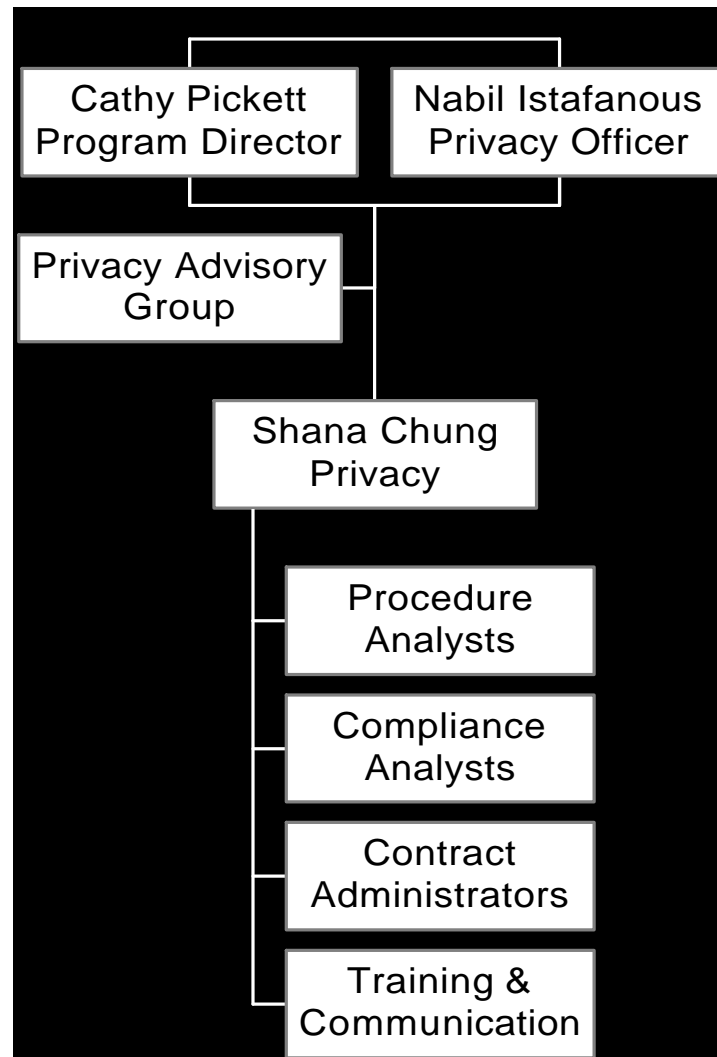
Assemble the right team



Organization Structure



Privacy Organization



Team Characteristics

- Legal knowledge
- Conceptual skills
- Practical experience
- Broad background
- Audit mindset
- Outside perspective
- Task master
- Workaholic



Strategy #3

Integrate with the Business



Business Involvement

Overall Process

Define HIPAA Requirements

High Level Design

Solution Selection

Detailed Design

Build & Test

Train & Deploy

Decision Process

Setup

- Identify business decision makers
- Log decisions needed in database
- Assign HIPAA Owner

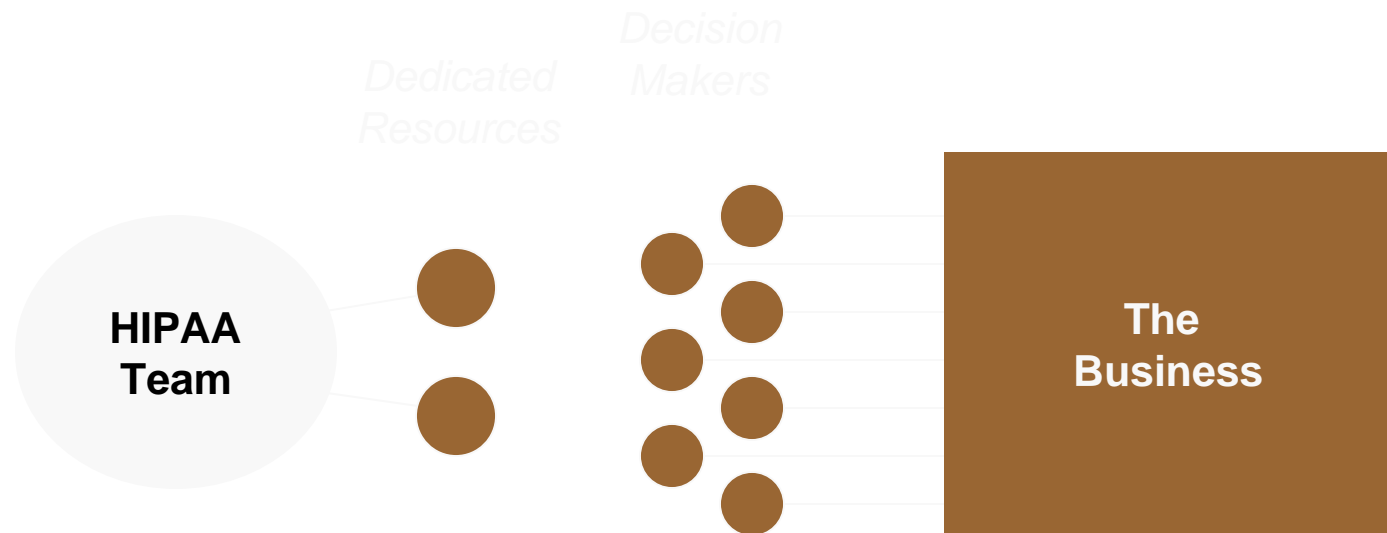
Execution

- Conduct fact finding
- Frame up options in a Decision Discussion Document
- Conduct review meeting

Follow up

- Document decisions
- Update Steering Committee
- Incorporate decisions into deliverables

Business Involvement



Strategy #4

Set a Course ...and Stick to It



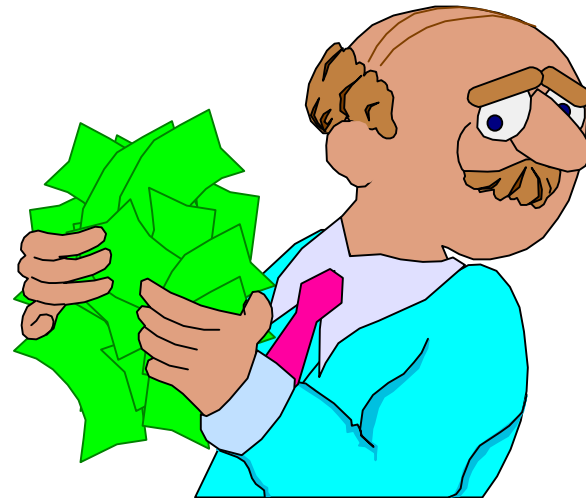
Program Phases

- Assessment
- Analysis
- Implementation
- Closeout



Consultants

- To use or not to use, that is the question . . .





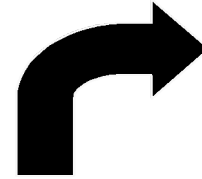
Workplan Development

Major Activities

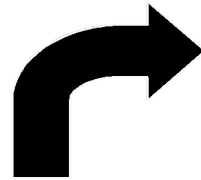
- Inventories
- Contract Modifications
- Policies & Procedures
- Technology Tools
- Training
- Privacy Notice

Milestone Tiers

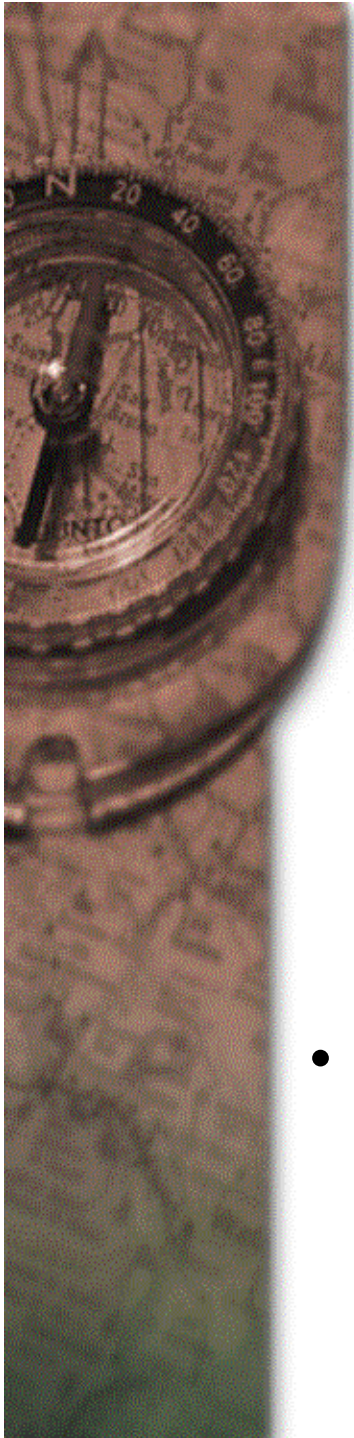
Executive Level
concrete
1 per quarter
critical path



Steering Committee Level
firm
1-2 per month
critical path



- Team Level
 - fluid
 - 2-3 per week
 - aggressive



Staying on Track

- Use a Steering Committee
- Identify SMEs, Stakeholders, and Decision Makers
- Plan for realistic timeframes and set aside contingency
- Schedule Left-to-Right and Right-to-Left
- Know your Critical Path



Strategy #5

Learn and Adjust



Lessons Learned

- Get agreement on deliverable content before work begins
- Leverage your expertise
- Raise red flags, but don't cry wolf
- Use consultants judiciously
- Look under every rock

