

# Advance Case Studies in HIPAA Implementation:

## *Practical Application of Privacy and Security Policies & Procedures*

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TECHNOLOGY



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AT THE INTERSECTION OF TECHNOLOGY AND LEARNING

# Panelists

- ❑ David Ermer, Partner, Gordon & Barnett
- ❑ Beth Kranda, Privacy Director, ACS, Inc.
- ❑ Ken Yale, Vice President, EduNeering, Inc.
- ❑ Nadine Zabierek, Privacy Officer, Health Care Service Corporation

# General Issues

- ❑ How do we get P&P into plain language and with the right level of specificity & practicality?
- ❑ How to create a P&P template? What makes a good policy? What should we include?
- ❑ How to get buy-in from the top and the bottom? How do we train the troops?
- ❑ How can we be sure to keep P&P scalable, flexible, reasonable?
- ❑ How do Privacy and Security P&P overlap or interact?

# Top Ten HIPAA P&P Headaches

- ❑ Training and documentation of training
- ❑ Minimum Necessary
- ❑ Phone Calls: verification, first contact
- ❑ Security and Privacy interaction/overlap
- ❑ Documentation in accounting for disclosures
- ❑ Amendment documentation and procedures
- ❑ Tracking disclosures of PHI outside of TPO
- ❑ Internal audits, evaluations of compliance
- ❑ Access control: Privacy vs Security
- ❑ State regulations on consent

# Resource Documents

- ❑ WEDI/SNIP P&P Resource Documents:
  - Privacy: [http://www.wedi.org/snip/public/articles/privacy\\_pp1115\\_02.pdf](http://www.wedi.org/snip/public/articles/privacy_pp1115_02.pdf)
  - Security: <http://www.wedi.org/snip/public/articles/072402securitypxpv12.pdf>
- ❑ URAC Accreditation Standards:
  - ❑ Privacy: <http://www.urac.org/urac.asp?id=88>
  - ❑ Security: <http://www.urac.org/urac.asp?id=89>