In the days following September 11, it was difficult to muster much interest in HIPAA, let alone attempt to arrange and conduct status and work team meetings. The topic seemed trivial and irrelevant. For example, several members of Congress voiced the sentiment that they did not have the same passion for the Patient Bill of Rights as they had prior to the attacks. Now, however, with the added threat of biological terrorism, security is an important and riveting topic and the availability of patient medical records is crucial to the welfare of the health of the American populace. HIPAA, the Health Insurance Portability and Accountability Act of 1996, plays an important role in the accessibility and protection of individually identifiable health information.

Achieving compliance with HIPAA regulations is a complex and sizeable undertaking. Many hospital departments are involved in the analysis and implementation, and all staff members are required to receive education and training. The steps required to achieve compliance are the following:

- Perform the Gap Analysis — determine what needs to be done to achieve compliance with all components of HIPAA.
- Develop a Compliance Plan — identify the priority, work plan, and budget for the compliance tasks.
- Complete the Implementation — perform the implementation tasks, which typically include hardware and software upgrades, testing, development of new policies and procedures, contractual updates for business associates, etc.
- Conduct Education — an ongoing process, from preliminary awareness of the topic and its implications to regular updates.

A critical component to achieving success with a HIPAA compliance project is the Project Organization and Administration, which translates to getting the right people from your organization to run with the project and make it happen. There are three major divisions to the HIPAA project and each of these can be treated separately:

- Part 1 — EDI, Code Sets, and Standard Identifiers. EDI and Code Sets have a firm compliance date of October 2002, while the Standard Identifiers do not have a compliance date as of this writing (October 2001).
- Part 2 — Data Security. This part does not have a firm compliance date yet.
- Part 3 — Patient Privacy. The compliance date is April 2003.

The first thing to consider is the scope of the project. This is a health
system project, not a hospital undertaking, so all components of the health system need to be involved. Study a corporate or high-level organization chart to determine all the pieces of the integrated delivery system:

- Hospitals/Acute Care Organizations
- Home Health Organizations
- Long-term Care Organizations
- Rehabilitation Care Organizations
- Psychiatric Care Organizations
- Primary/Ambulatory Care Organizations
- For-profit Companies (MSOs, billing companies, etc.)
- Foundation
- Etc.

Once the scope is determined, the next step would be to develop a project organization structure. There are multiple models to consider, including those shown in figures 1 and 2, which would be used during preliminary discussions of the best structure.

The organization shown in figure 1 is the Facility Approach. Under this model, each of the work teams would initiate a HIPAA project with their organization, identifying leadership and team members. Leaders of functional teams (i.e., EDI, Data Security, and Patient Privacy) in each group would be able to share information and experiences with their peers in other groups. The organization shown in figure 2 is the Functional Approach. Under this model, functional teams would be made up of representatives from each major facility, with periodic facility status meetings.

Once the project is started and the first couple of meetings occur (which may understandably be a little confused and uncomfortable), the “best” project structure would evolve. This usually depends upon several factors, including the computer systems in use, status of common policies and procedures across the delivery system, use of common network infrastructure, and other factors.

A HIPAA Steering Committee is an important part of the project organization. This group would make decisions, assign resources, review status, and perform other ad hoc duties. Although each healthcare organization is unique, the HIPAA Steering Committee is generally composed of representatives from the following departments and services, and is chaired by a senior management executive:

- Medical Records/Health Information Management
- Information Technology
- Patient Accounting/Business Office
- Patient Intake
- Clinicians (physicians and nurses)
- Legal/Risk Management
- Public Relations/Marketing/Patient Relations
- Compliance Office
- Internal Audit
- Ancillary Services
- Human Resources
- Education/Organization Development

The following department personnel would be the primary staff on the work teams, although input from other departments will be needed during the course of the project:

- EDI Work Team — Patient Accounting, Patient Intake, Information Technology
- Data Security Work Team — Information Technology
- Patient Privacy Work Team — Medical Records, Legal, Compliance Office

The HIPAA Project Manager is a key individual and needs to possess excellent project management skills. It
helps if the person is already familiar with the entire healthcare delivery system, understands the politics, and knows how to get things done and who to call for the right information. A HIPAA Repository Coordinator is a valuable team member — this is a person who will ease the administrative burden of the HIPAA Project Manager. The duties include organizing the paper and files, setting up e-mail distribution lists and folders on public servers for easy team access, scheduling meetings, taking and distributing the minutes, sending reminders about deliverables, and “other duties as assigned.”

Although no two HIPAA projects are the same, the following are suggested timeframes for monthly commitments of time by project team members:

- HIPAA Project Manager — 8 days per month
- HIPAA Repository Coordinator — 8 days per month
- HIPAA Steering Committee member — 4 hours per month
- Team Leader (EDI, Data Security, Patient Privacy) — 8 days per month per team leader
- Team Member — 4 days per month per team member
- Legal Department — 4 days per month

In conclusions, the HIPAA project is large, complicated, but important, not just because of the compliance issues, but because it is the right thing to do. Here are “Ten Tips to Project Success,” which apply to HIPAA but could readily be used for nearly any project:

1. Acknowledge hard work and milestone successes.
2. Have an “inspirational” moment before a meeting.
3. Make education fun. Read the regulations out loud, meet outside, have silly “pop quizzes.”
4. Conduct efficient meetings and don’t waste everyone’s valuable time.
5. Don’t re-invent the wheel. There are lots of templates and examples available.
6. Provide administrative assistance for major typing, communications, minutes, meeting set-up, filing, and research.
7. Get organized first, so that paper files are centralized, server access is not a problem, e-mail distribution lists are debugged, etc.
8. Match staff with their interests as well as their roles.
9. Get outside help if the project is floundering (legal, technical, project oversight).
10. Don’t underestimate or trivialize the effort.

About the Author

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Continued on page 9