



CATWALKSM

CONSULTING A different PERSPECTIVE
to linking BUSINESS and TECHNOLOGY

Winning Strategies: HIPAA Assessment

The Situation

As you are probably aware, in 1996 the federal government passed the Health Insurance Portability and Accountability Act (HIPAA). Among those organizations that are affected are:

- i Hospitals
- i Healthcare Facilities
- i Medical Groups
- i Insurance Companies
- i Individual Health Practitioners

In short, any organization that deals with the sharing, processing or passing along of information about individuals regarding personal health information. This action has created significant challenges for health organizations including:

- i reducing costs
- i making administrative transactions more secure, efficient, and patient oriented
- i enhancing the privacy and security of personal health information

In addition, HIPAA also requires any health organization that electronically stores or sends patient information

- i to retool how it handles health data,
- i and to address privacy and security regardless of the form in which personal health information is stored or transmitted.

It should come as no surprise that many organizations are struggling because federal regulations require HIPAA compliance with transactions & code set requirements by October 2002, and privacy requirements by April 2003. For those organizations with the foresight to file the appropriate HIPAA extension, compliance with transactions & code set requirements can be delayed until October 2003. While the final rules appear to be a daunting challenge, they have promising benefits when an organization is willing to look beyond just compliance.

Our HIPAA Approach

Catwalk Consulting offers a solution to quickly identify your organization's level of compliance with HIPAA standards, as well as a review of your exposure to non-compliance by business associates. The major components of our HIPAA approach are:

Administrative Review. We begin by identifying how deeply your organization is affected by HIPAA, and where you are at today.

- § What aspects of your business have exposure to HIPAA compliance?
- § What steps have already been taken to become HIPAA compliant?
- § Has your organization formed a HIPAA task force?
- § How does HIPAA impact your organization's eHealth initiatives?
- § What is the flow of personal health information throughout the organization?
- § How are employee roles affected by the "Minimum Necessary" rule?
- § What level of training is being provided to employees on HIPAA awareness?

Technology Assessment. Because technology plays such an important role in how business is conducted today, it's only natural that it is at the center of many HIPAA compliance activities. Catwalk will perform a readiness assessment of your current infrastructure to include:

- § A comprehensive technology inventory to identify each component of your infrastructure that is affected by HIPAA.
- § Reviewing how personal health information is stored electronically and how it is accessed through your existing systems and business applications.
- § Reviewing how personal health information is transmitted, including identifiers, local code sets, and EDI capabilities.
- § Identifying electronic interaction with trading partners, and how these activities are affected by HIPAA
- § Reviewing gaps in technology related security mechanisms, such as system logins, passwords, email, etc.

Security Assessment. HIPAA compliance on the security of personal health information is one of the most far reaching aspects of this process. Security applies to the spectrum of physical, technical and administrative safeguards that are put in place to protect the integrity, availability and confidentiality of information. Catwalk will perform a review of your existing security measures to include:

- § Review of current security policies and procedures.
- § Identification of current physical security measures, including how computer systems and related buildings and equipment are protected from hazards and intrusion.

- § Review of current technical security measures, such as servers, firewalls, software, etc., and the associated processes that protect and monitor access to or transmission of personal health information.
- § Development of procedures and policies for the enforcement of security measures.
- § Contingency planning in the event that there is a breach of security in accessing personal health information.

Privacy Assessment. The privacy aspects of HIPAA compliance address many of the customer facing issues your organization will encounter with personal health information.

- § Review of current security policies and procedures.
- § Review of your organization's consent and authorization procedures to identify how they may be impacted by HIPAA.
- § Development of policies and procedures on the use and disclosure of personal health information, as well as audit trails to document these activities.
- § Identification of relevant state privacy laws as they pertain to HIPAA.
- § Development of procedures and policies for the enforcement of security measures.
- § Development of a plan for the archiving and subsequent retrieval of personal health information.

Business Associate Review. One of the more interesting aspects of HIPAA is that many of the organizations that you do business with on a day-to-day basis will be affected as well. And their level of compliance is directly correlated to your ability to become compliant. We will work with you to:

- § Perform a comprehensive review of your business associates, and identify those that are impacted by HIPAA.
- § For affected business associates, we will conduct a review of their privacy policies as they relate to personal health information.
- § Review all pertinent contracts with business associates to identify those that need to be renegotiated.

Strategic Roadmap. When the process is complete, you'll be provided with a roadmap to guide you through your HIPAA implementation activities, which will include:

- § Identification of critical compliance priorities.
- § Gap assessment as compared to the specific HIPAA requirements for your organization.
- § A detailed compliance rating in each of the five previously discussed areas.
- § A strategic plan outlining the path to compliance in each area, and for your overall organization.
- § Estimated time and costs to achieve compliance in each area.

§ Benefits of compliance to your organization as they relate to HIPAA and non-HIPAA related activities.

The End Result

Once we've completed our assessment, you will have a set of deliverables that detail the road to HIPAA compliance. Then, the choice is yours. You can move forward with your internal staff to implement your HIPAA initiatives, or you can engage Catwalk for these activities.

Catwalk has an excellent reputation for delivering winning strategies and outstanding business and technology services. When you work with us, you are hiring an organization with the loyalty of a business partner and the "economics" of an outside vendor. Our goal is to help you complete mission critical projects like HIPAA, efficiently and reliably. Our team brings expertise in planning, management and coordination of projects of all sizes from concept to completion, regardless of scope, technical environment or business climate.

How Can Catwalk Help?

We can work with your organization to develop a plan of action for HIPAA and more. While we are acutely aware of the financial and human resources needed to come into compliance with HIPAA, we believe the benefits that can be achieved are significant. Because HIPAA extends far beyond technology issues to core business processes, strategies, policies, and security measures, it provides the opportunity to reinvent operations and begin reshaping your organization to do business in the economy of tomorrow. By using HIPAA compliance to gauge the overall state of your business and the processes that make it work, we can then take it to the next step and help you identify how technology can be utilized to support your processes and overall business goals.

Our scope of capabilities allows us to help our clients plan for and achieve the associated benefits and more, as opposed to merely achieving compliance with the regulations as an independent initiative. We can help you:

- i use HIPAA to support migration to electronic medical records
- i improve your revenue cycle operations
- i reduce costs by transitioning to electronic communications and transactions
- i facilitate the development of an eHealth infrastructure
- i increase the consumer's overall level of trust and satisfaction with your organization.

We look at business strategy, processes, and organizational issues, as well as technology, in everything that we do.

Our HIPAA capabilities are demonstrated by our:

- Strong healthcare-specific industry expertise and resources dedicated to HIPAA.
- Demonstrated thought leadership in evaluating HIPAA's impact on organizations.
- Proven success in the management of large-scale, enterprise-wide programs.
- Experience in comprehensive business applications review and code remediation.
- Track record in helping our clients achieve their goals through the effective use of technology as an enabling tool for their entire organization.

We thrive on helping your organization navigate through HIPAA and, even more importantly, helping you position your organization, and your technology, for the future of your business.

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