

HIPAA: Just Good eBiz

Successful HIPAA implementations require comprehensive training, on-going employee education

By Michael Doscher, for HealthLeaders.com, April 13, 2001

To successfully implement all HIPAA components, education and training processes need to begin early in the project life cycle, and significant investment in knowledge resources will be necessary.

From the outset, a HIPAA implementation requires critical subject matter expertise to perform an assessment of one's needs. Moreover, the security and final privacy rules, with their April 14, 2003, effective date now being supported by the Bush administration, require related internal and on-going training programs and policies.

Before beginning implementation, a covered entity's executive management must become aware of HIPAA's broad impacts. At this point, most payer and provider management teams are aware of the imminent compliance deadlines. Provider organizations are still biding their time.

Depending largely on the phase of the implementation, the four general education and training areas are:

- Orientation and awareness
- In-depth training on assessment process, tools and impacts
- Specialized HIPAA implementation components
- On-going internal operations

The diverse affected participants include, but are not limited, to:

Orientation and awareness

- Potential HIPAA implementation sponsors
- Executive team, including legal counsel
- Almost all department managers and supervisors
- Almost all employees
- Key business associates not directly covered by HIPAA

In-depth training on implementation process, tools and impacts

- HIPAA implementation team
- HIPAA governance group

Specialized HIPAA components

- Transactions, code sets and unique identifiers
 - Affected financial systems managers and staff
 - Interface engine and transaction translator managers and staff
 - Designated implementation team subject matter experts
 - Legal counsel for chain of trust agreement terms
- Administrative Security and Privacy
 - Designated implementation team subject matter experts
 - Enterprise Security and Regulatory Compliance Offices
 - Human Resources
 - Information Technology

- Medical Records
- Utilization Review
- Legal counsel for business associate agreement terms
- Technical Security
 - Designated implementation team subject matter experts
 - Technical Security Office
 - Network and applications security leads

On-going internal operations

- Departmental
 - Regulatory compliance office
 - Chief security office
 - Human resources
- Enterprise-wide
 - Almost all employees

The number of people to be trained in each area varies considerably. For many organizations, the process of orienting most department managers and leads would involve groups of 20-50 people. In contrast, orienting the executive team typically involves a handful of personnel. Training most employees could necessitate training thousands. Different modalities are appropriate for specific audiences. Some of the possible modalities include:

- General lectures
- Newsletters (traditional or electronic)
- Classroom with group participation and testing
- Computer-based training (CBT) with measures of progress and achievement
- Intranet or private Internet content
- Educational sessions provided by professional societies, HIPAA alliances and forums
- Vendor classes and certification
- Self-help

The table below, a blueprint for an education strategy, depicts what training modality is appropriate for which form of education and audience during each implementation stage.

Implementation Phase	Form of Education	Audience	Modality
Pre-Project	Awareness and Orientation	<ul style="list-style-type: none"> ▪ Potential HIPAA sponsors or visionary ▪ Executive team 	<ul style="list-style-type: none"> ▪ Internet mining ▪ Local forums or alliances ▪ Professional societies Lectures by consultants, vendors or other informed source
Assessment	Awareness and Orientation	<ul style="list-style-type: none"> ▪ Almost all department managers and supervisors ▪ Key business associates not directly covered by HIPAA ▪ Almost all employees 	<ul style="list-style-type: none"> Lectures by consultants, vendors or other informed sources ▪ Newsletters ▪ Intranet or Private Internet content ▪ Lectures in auditoriums, perhaps, optional
	In-depth training on implementation process, tools and impacts	<ul style="list-style-type: none"> ▪ Implementation team ▪ Governance group 	Tailored lectures and interactive learning provided by consultant, vendor or other HIPAA specialist
Implementation	Specialized HIPAA components	<ul style="list-style-type: none"> ▪ Transactions, Code sets and unique identifiers specialists ▪ Technical Security specialists <p>Legal counsel for chain of trust and business associate agreement terms</p> <hr/> <p>Administrative Security and Privacy professionals</p>	<ul style="list-style-type: none"> ▪ Classroom with group participation and testing ▪ Computer-based training (CBT) with measures of progress and achievement ▪ Vendor classes and certification ▪ Lectures provided by consultants or law firms with HIPAA practice ▪ Educational sessions provided by professional societies, HIPAA alliances and forums ▪ Self-help via the Internet ▪ Educational sessions provided by professional societies, HIPAA alliances and forums ▪ Self-help via the Internet ▪ Classroom with group participation and testing
On-going internal operations		Most employees	<ul style="list-style-type: none"> ▪ Intranet or private Internet training manual with monitoring of progress through materials ▪ Internal in-service education program ▪ Internal reminders system
		Departmental Regulatory compliance office, Chief security office and Human resources responsible parties	<ul style="list-style-type: none"> ▪ Classroom with group participation and testing ▪ Computer-based training (CBT) with measures of progress and achievement ▪ Certification sessions provided by accreditation bodies, professional societies, HIPAA alliances and forums

The Internet and corporate intranets are likely solutions to most of the large audience awareness and technical training requirements. These on-line solutions are not, however, appropriate for the smaller audience or tailored departmental manager awareness and orientation sessions. A recent search of the Internet for HIPAA training yielded numerous relevant opportunities, as well as lists of links to additional sites. The types of organizations providing resources differed greatly. HIPAA educational resources were available from the following diverse entities:

- Traditional healthcare information technology vendors
- Major technical security vendors with service lines deemed responsive to the HIPAA security rule
- Web-based training tool providers with a HIPAA specialty curriculum
- Successful state and regional alliances
- Healthcare interest groups focusing on HIPAA education

- State governments
- Health industry professional societies
- Healthcare consultants

[Medscout Corporation](#) identifies many of the prominent education and training resources in its on-line inventory. Look for these specific resources:

- American Health Information Management Association (AHIMA)
- Health Care Compliance Association (HCCA)
- Health Data Management
- Rx2000 Institute!
- North Carolina Healthcare Information and Communications Alliance (NCHICA)
- HIPAA Plus - HCFA
- Joint Healthcare Information Technology Alliance (JHITA)
- Association for Electronic Health Care Transactions (AFEHCT)
- HIPAAcomply
- Internet Health Care
- American Medical Association
- HIPAAadvisory.com
- MITRE
- National Institute of Standards and Technology (NIST)
- Massachusetts Institute of Technology (MIT)
- SMS HIPAA Central
- Division of Information Resources Management (IRM)
- ASTM Technical Standards for Industry Worldwide
- Maryland Health Care Commission
- North Carolina Healthcare Information and Communications Alliance (NCHICA)
- Massachusetts Health Data Consortium
- National Association of Insurance Commissioners (NAIC)
- Model Laws and Resolutions - National Conference of Insurance Legislators (NCOIL)
- CPRI (Security Best Practices and Presentation)

No list would be complete without referencing the site maintained by the [Workgroup for Electronic Data Interchange \(WEDI\)](#).

Internet sites such as JAWZ Inc.'s [HIPAA-U.com](#) have chartered themselves to educate the healthcare community on HIPAA. Sites such as the [MIS Training Institute](#), HCpro's [HCprofessor](#), [Easy i Ltd.](#) (headquartered in England) and [hipaa-on-line.com](#) represent web-based training sites that deliver some form of on-line HIPAA curricula.

Clearly, all covered entities and their business associates now have access to multiple competent resources that can satisfy their initial education and training needs. In the future, many of the same sites will likely provide curricula targeted at HIPAA compliance certification.

When selecting a provider of education and training, the organization should consider the following attributes:

- Use of trained and experienced trainers
- Demonstrated competence in CBT curricula incorporating learning metrics such as progress and proficiency measures
- Availability of multiple training modalities
- Comprehensive suite of HIPAA services covering the complete HIPAA compliance life cycle. Continuity of HIPAA planning assessment and implementation services is key to an efficient implementation.
- Local training facilities or staff
- Depth and breadth of healthcare and HIPAA expertise

- Association with existing or proposed HIPAA certification authorities

Competent HIPAA education and training represents a critical implementation success factor. Although many appropriate resources are available in the public domain, organizations will still need to invest heavily in HIPAA curricula that is tailored to their settings. To be effective, organizations must take advantage of different modes of education. To be successful, the HIPAA security and privacy policies and procedures must become a learned and consistently practiced behavior.

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From its inception in 1985, Covansys Corporation (formerly Complete Business Solutions Inc.), headquartered in Farmington Hills, Mich., has offered services ranging from developing client strategic technology plans including now eCommerce to actual implementation of appropriate solutions. Covansys has generated over one-half billion dollars revenue per year employing almost 5,000 IT personnel.

Covansys has completed several HIPAA assessments in the payor community. The healthcare solutions group is led by Leon Barrett, known in the industry as a leader in the standards-based EDI movement, a major contributor to the HIPAA legislation and consultant to the staff in the Department of Health and Human Services.

The Covansys website URL is www.covansys.com