



**CAREGROUP**  
HEALTHCARE SYSTEM

# **HIPAA Implementation**

**Overview and Plan**

# Our Approach

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- Administrative Simplification
- Privacy Rule
- Security Rule



# Our Innovative Approach to Administrative Simplification

## Payors with Secondary Connectivity Solutions

- BC/BS of Massachusetts
- Massachusetts Medicaid
- Medicare



## Contract Affiliates



## Additional Members



Children's Hospital  
Boston



Current NEHEN Membership



# NEHEN Development Plan

Process / Transaction*	Status	Planning Start Date	Pilot Date	General Availability
Eligibility Verification	<b>Complete</b>	<b>Complete</b>	<b>Complete</b>	<b>Complete</b>
Specialty Referral	<b>Complete</b>	<b>Complete</b>	<b>Complete</b>	<b>Complete</b>
Claim Status Inquiry	<b>Complete</b>	<b>Complete</b>	<b>Complete</b>	<b>Complete</b>
Referral Authorization	<b>Complete</b>	<b>Complete</b>	<b>Complete</b>	<b>Complete</b>
Referral Inquiry	<b>Complete</b>	<b>Complete</b>	<b>Complete</b>	<b>Complete</b>
Electronic Remittance Advice	<b>Complete</b>	<b>Complete</b>	<b>Complete</b>	<b>Complete</b>
Claim Submission - Institutional	<b>Pilot</b>	<b>Complete</b>	<b>7/02</b>	<b>10/02</b>
Claim Submission – Professional	<b>Pilot</b>	<b>Complete</b>	<b>7/02</b>	<b>10/02</b>
Claims Attachment	<b>Pilot</b>	<b>Complete</b>	<b>7/02</b>	<b>10/02</b>
First Report of Injury and Discharge Notice	<b>TBD</b>	<b>TBD</b>	<b>TBD</b>	<b>TBD</b>
Claim Submission – Dental	<b>No plan to implement at this time</b>			

# Internal Approach for Leveraging NEHEN's Value

<b>Educate</b>	<b>Communicate Existing and Potential NEHEN Capabilities to Finance, Operations, and Individual Entities</b>	<ul style="list-style-type: none"> <li>• Group presentations and individual meetings</li> </ul>
<b>Discover</b>	<b>Collect Business Metrics, Process Details, and Additional Detail on Information Systems Capabilities and Requirements</b>	<ul style="list-style-type: none"> <li>• Individual meetings and prepared documentation</li> </ul>
<b>Target</b>	<b>Identify Best Practice Approach, Determine Feasibility, and Define Solution</b>	<ul style="list-style-type: none"> <li>• Facilitated workshops and interviews</li> </ul>
<b>Model</b>	<b>Identify Gaps, Model Return on Investment (ROI), and Establish Improvement Targets</b>	<ul style="list-style-type: none"> <li>• Facilitated workshops, individual meetings, and independent analysis</li> </ul>
<b>Plan</b>	<b>Define and Prioritize Business and Technical Projects and Plan for Process Change Management</b>	<ul style="list-style-type: none"> <li>• Independent analysis and preparation</li> </ul>
<b>Budget</b>	<b>Define and Prioritize Business and Technical Projects and Plan for Process Change Management</b>	<ul style="list-style-type: none"> <li>• Independent analysis and preparation</li> </ul>

# Privacy Rule

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- Notice
- Consent/authorization with choice (opt out)
- Transfers to third parties
- Accessing, copying, and amending
- Enforcement, complaint, investigation, and disciplinary procedures
- Right to know who got the information.



# Privacy Workplan

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- Privacy Officer
- Master Policy Manual
- Standard Forms
- Notice of Privacy Practices
- Staff Training
- Disciplinary Program
- Access Controls
- Complaint Procedures
- Amendment Procedures
- Procedures/Policies for remediating non-compliance.
- Procedures/Policies for research.
- Agreements with Business Associates
- Opt out policies/procedures
  - marketing
  - fund raising



# Role of CareGroup in Achieving HIPAA Compliance

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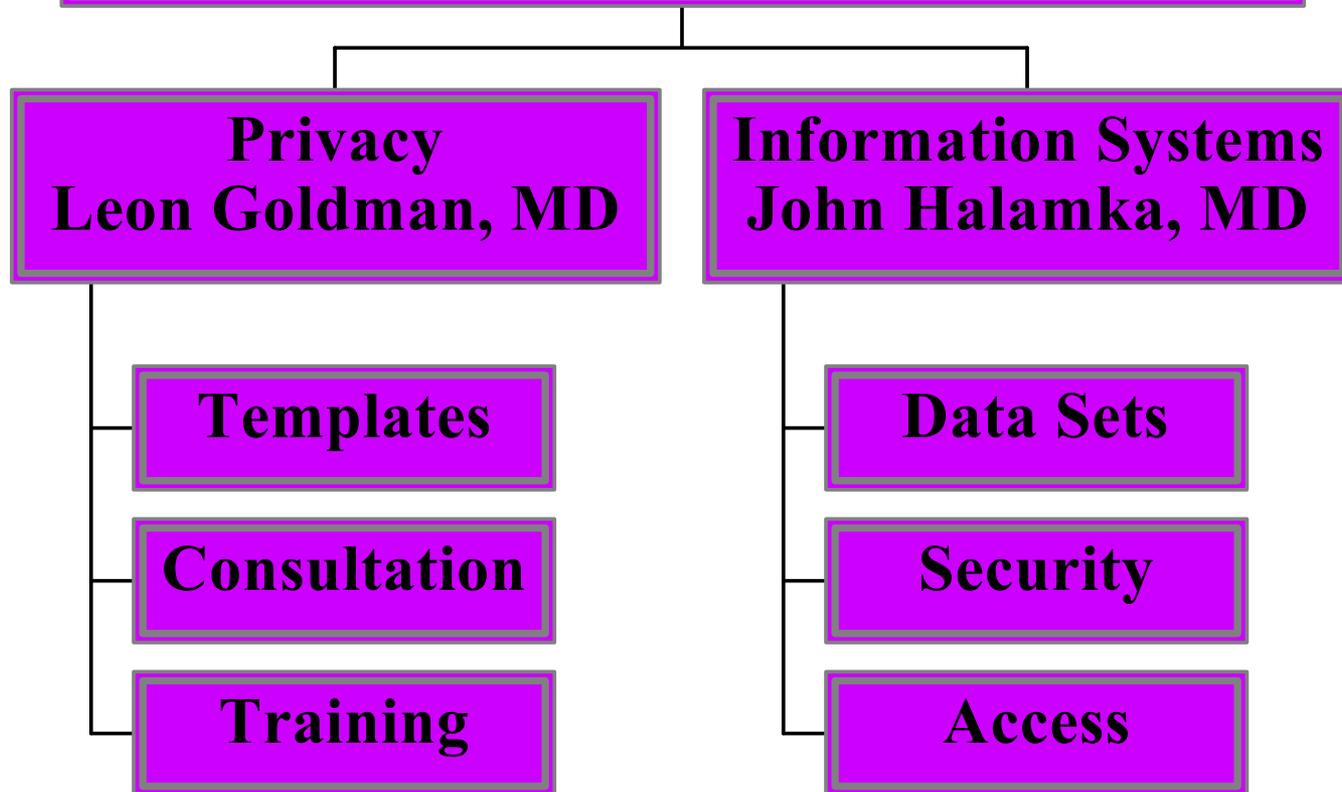
- Communicate HIPAA requirements to affiliates.
- Act as internal consultant and resource to CareGroup hospitals.
- Provide template work plan to affiliates.
- Provide template policies and procedures, consents and authorizations.
- Participate on committees as requested.
- Provide template training programs to affiliates.



# CareGroup HIPAA Work Team

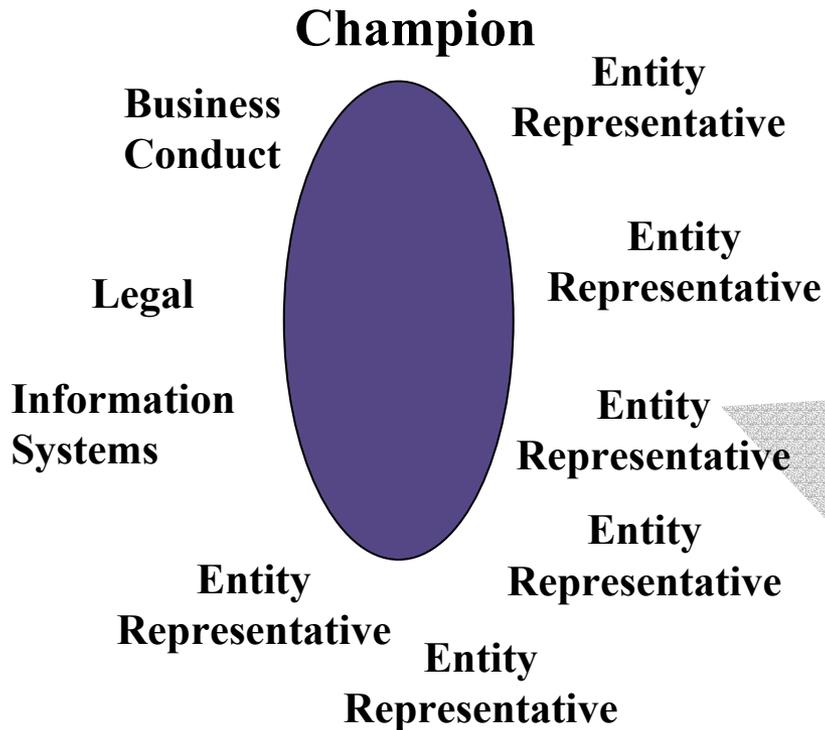
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## CareGroup HIPAA Oversight Committee

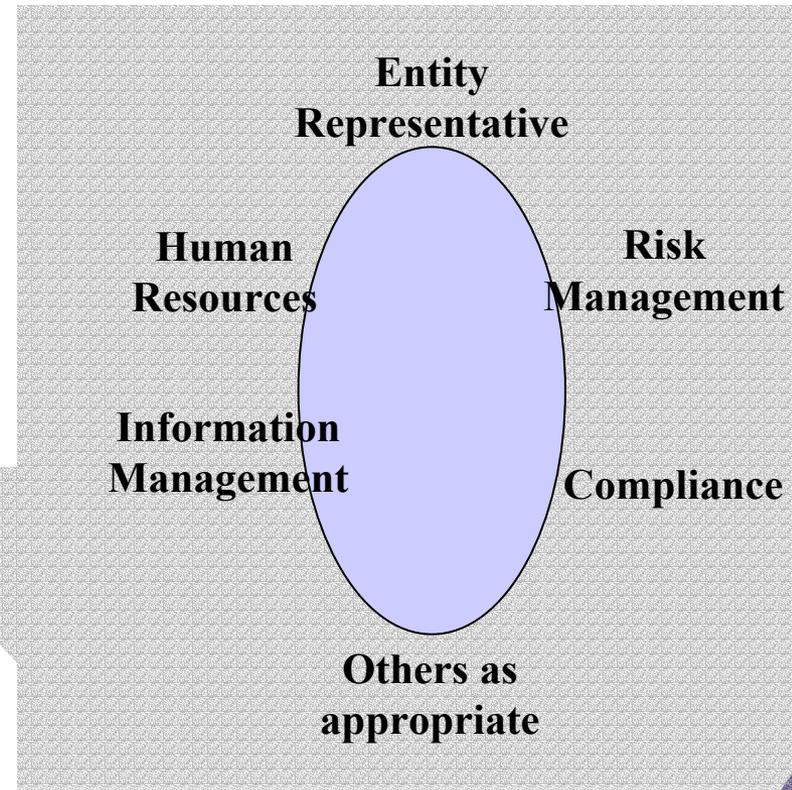


# HIPAA Oversight

## CareGroup Level



## Local Level



# Security Rule

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Inventory and analysis of every application that contains patient identified information

- Matrix of 60 criteria
- Remediation of worst offenders – risk mitigation principle



# Summary

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- Administrative Simplification saves millions
- Privacy Rule is good business
- Security Rule used to mitigate risk

