

Conducting Your Own Internal Assessment (HIPAA on the Job)

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Are you prepared to comply with the final standards that the Health Insurance Portability and Accountability Act will soon mandate? Experts recommend that to begin to prepare, you conduct your own internal assessment to determine where your organization is and where it needs to be. **Now** is the time to conduct this **internal assessment for HIPAA readiness**. In this installment of "HIPAA on the Job," we provide a sample assessment as a place to begin.

The Complex Road to Making Things Simpler

The provisions of HIPAA that most concern us are the **administrative simplification** provisions. These aim to improve provider and payer communication of claims information and reduce overhead and administrative expenses. Currently, these processes involve numerous paper forms and telephone calls and create many delays in exchanging information for both providers and payers. To address these problems, the government and the industry have been developing standards for executing these transactions electronically.

The law applies to all healthcare providers (physicians, hospitals, laboratories, long term care, pharmacies, and medical supply companies), as well as health plans (insurance and managed care) and healthcare clearinghouses. These covered entities will be required to implement the uniform set of electronic data interchange standards for the exchange of administrative information. The Department of Health and Human Services (HHS) is planning to issue a series of HIPAA regulations throughout 2000, and these regulations (barring further delay) are expected to take effect in 2002.

For HIM professionals and other healthcare administrators, HIPAA is the hot topic of the moment. But how to begin? An internal assessment of your organization is a good place to start. This article presents some sample forms for you to use as a baseline in assessing your organization's state of readiness. Once you know how ready your organization is, share the results with management, information technology staff, and others and decide where you need to go from here.

As you continue through the process, use the resources listed in "Sources of HIPAA Information" as well as others to educate yourself.

Sources of HIPAA Information

Tentative schedule of HIPAA administrative simplification regulations—
<http://aspe.os.dhhs.gov/admnsimp/pubsched.htm>

Frequently asked questions about standards for electronic transactions—
<http://aspe.os.dhhs.gov/admnsimp/faqtx.htm>

Frequently asked questions about national provider numbers—
<http://aspe.os.dhhs.gov/admnsimp/faqnpi.htm>

Frequently asked questions about national standard employer numbers—
<http://aspe.os.dhhs.gov/admnsimp/faqemp.htm>

Frequently asked questions about code sets—

<http://aspe.os.dhhs.gov/admsimp/faqcode.htm>

White paper on the unique health identifier for individuals—

<http://ncvhs.hhs.gov/noiwp1.htm>

HIPAA internal assessment for HIM professionals

General Survey Questions

Your Healthcare Organization	Yes	No
1. Does your organization have a group or individual responsible for HIPAA information and compliance planning?		
2. Has your organization completed an internal high-level assessment for HIPAA compliance in these areas?		
- privacy		
- security		
- data sets		
-transaction standards		
2. Has your organization determined resources required to comply with HIPAA standards?		
3. Has your organization created a "two-year action plan" as a result of conducting the high-level assessment?		
4. Is your comprehensive two-year action plan consistent with IS and corporate strategic plans?		
5. Have you created a step-by-step implementation work plan? Does someone "own" this?		
6. Does your organization have a migration plan for ED/EDI solutions?		
7. Has your organization created a "vision of the future state"? Does the vision include best practices?		
8. Does your organization have contractual obligations related to the implementation of government mandates?		
Your HIM Department	Yes	No
1. Are you current on the regulations?		
2. Have you established an MPI cleanup plan (or have it completed)?		
3. Are you active in working with your peers in improving the patient registration system?		
4. Are ongoing data integrity checks in place?		
5. Is the charge description master (CDM) kept up to date? Is HIM playing a leadership role in the CDM updates?		

6. Have you worked with IS to set up interfaces and cross-referencing?		
7. Have you (or your team) conducted risk assessments on security ?		
8. Have you conducted a comprehensive analysis of current procedures in HIM and throughout the revenue cycle? Did you prepare workflows? Data modeling?		
9. Have you encouraged your employees and peers to attend HIPAA continuing education programs?		
<i>National Identifier Standards</i>		
Providers	Yes	No
1. Does your organization currently perform provider enrollment functions?		
2. Does the length of your current provider number format equal or exceed the proposed national provider identifier?		
3. Is your current provider number alphanumeric?		
4. Is there excess space (filler space) in systems referencing or maintaining provider information?		
Employers	Yes	No
1. Does your organization currently require an employer identifier for any process or procedure?		
Health Plans	Yes	No
1. Does your organization currently require a health plan identifier for any process or procedure?		
<i>Code Set Standards</i>	Yes	No
1. Does your organization currently accept or support the following code sets?		
-ICD-9-CM		
-CPT-4		
-HCPCS		
-CDT		
-NDC		
2. Does your organization rely on "local" coding schemes to conduct business?		
<i>Transaction Standards</i>	Yes	No
1. Does your organization currently send or receive data in ASC X12 formats?		
2. Do you currently have a translator on site?		
3. Do you currently use a switch/clearinghouse for translator/routing services?		

4. Does your organization currently send or receive data in NCPDP format? What version? _____		
5. Does your organization currently support NCPDP Batch Transaction Standard V 1.0?		
6. Does your organization currently send or receive data in HL7 format?		
Security Standards		
Administrative Procedures	Yes	No
1. Does your organization have a formal written security program/policy?		
2. Is a business continuity policy in place?		
3. Are procedures in place to monitor for fraudulent behavior? If so, are they enforced with employee disciplinary action?		
Physical Safeguards	Yes	No
1. Is a secure environment provided for all equipment at all times?		
2. How does your organization authenticate individual access?		
-Password		
-Smart card		
-Physical characteristics		
-Other		
Technical Security Services	Yes	No
1. How does your organization authenticate users?		
-Context-based access		
-Role-based access		
-User-based access		
2. Are audit procedures in place to document security access control violations?		
3. Do you have a procedure for handling natural and man-made disasters?		
Technical Security Mechanisms	Yes	No
1. Does your organization's network connect to the Internet?		
2. Is encryption used on any software or hardware in your organization?		
3. Does your organization use digital signatures?		
4. Has your organization ever used network assessment software for vulnerabilities?		

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