

What's Your HIPAA ETA? (HIPAA on the Job)

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If you are thinking about HIPAA's privacy compliance date of April 14, 2003, think again! Privacy compliance is about ongoing learning: education, training, and awareness (ETA).

While it is true that the final privacy rule only calls for work force training on hire and when there are changes, compliance will require that privacy be top of mind at all times. The proposed security rule recognizes the difference between training and awareness, calling for both. The privacy and security rules address many issues to be complied with by many different types of people.

To introduce these issues, have everyone understand them, and comply with them, however, requires different approaches foreach different audience and topic. This article helps identify the some ways you can educate all members of your work force about the information privacy and security challenges they may face.

ETA—What's the Difference?

Education, training, and awareness form a continuum of learning. **Education** is imparting knowledge from an expert to someone who needs that knowledge. **Training** is showing someone how to do something. Building **awareness** provides reminders to ensure that ongoing activity is consistent with requirements. See "[Learning Through ETA](#)".

While lifelong learning is critical to survival, a balance needs to be struck among education, training, and awareness. Consider a person learning to be a surgeon. Reading books and listening to lectures is an important preparatory step to actually performing a surgical procedure. But until the last suture is made—under the watchful eye of a trainer—the student really cannot be considered a surgeon. Extending this example, there are also many reminders in the surgical suite about appropriate prepping, monitors to alert the surgeon to changes in the patient's condition, and support staff to fulfill their individual roles.

For privacy and security, education, training, and awareness also have specific roles to play. Education is useful for imparting knowledge about what the regulations require. Training is needed to show staff how to carry out the regulations. Finally, everyone needs reminders that make privacy and security part of the care process.

Learning through ETA

Process	Education---> +	Training---> +	Awareness +
Requirements	Context	Practice	Reminders
Purpose	Knowledge--->	Perform a Skill--->	Continuous Performance--->

ETA—What Works?

Two wise people have contributed significantly to the domain of learning effectiveness. In 451 BC, Confucius said, "What I hear, I forget. What I see, I remember. What I do, I understand." In the 1960s, Marshall McLuhan said, "The medium is the message." We would do well to remember these principles as we design a training program.

Just as education, training, and awareness are used for different purposes, there are different ways to deliver information depending on content and audience. For example, physicians tend to learn administrative issues best on their own and by being told precisely what they have to do. Most physicians will not be interested in or need to know the history of HIPAA, or even why they need to do certain things. They have learned through experience that government regulations must be dealt with and simply want to be advised what practices they should follow. They generally need limited education, one-time training, and subtle but ever-present reminders.

At the other end of the spectrum are volunteers, who also need minimal knowledge about HIPAA (although they may want more), fairly regular retraining, and very direct and frequent reminders. They need examples to fully understand how to handle protected health information to which they may have access. They may even need some actual practice before the organization is comfortable putting them into certain positions.

Alternatively, other caregivers may prefer to have some background about HIPAA, like to work in groups to learn skills from others, and may not need reminders about privacy and security as frequently. Personal privacy has been ingrained in most caregivers from their early professional education and training experiences.

sample training database

Date(s)	Topic	ETA	Target	Attendance Record?	Medium	Competency?	F/U
1/1/02	HIPAA Privacy Modification	E	Clinical Managers	N/A	Flyer	No	Quarterly Manager Meeting
1/1/02–2/28/02	Physical Security	A	Workforce	N/A	Tent cards in cafeteria	No	Audit doors 2/1/02

ETA—What Tools?

Finally, just as there are differences among education, training, and awareness, there are different tools as well. Generally, in healthcare facilities, there are fairly limited learning opportunities:

- **new-hire orientation**, which educates people on the policies of the organization. But there are many policies on many different issues, and the amount of information imparted is often overwhelming, even for highly educated people
- **information systems training**—for example, when users receive their user ID and password. This is a good opportunity to educate users a bit more on privacy and security, train them on selecting a strong password, and remind them of the organization's policies. At this stage people are still very new in their jobs, however, and so may not be fully focused on all aspects of what is being covered
- the annual **performance review**. This is generally the worst time for learning to occur, as employees are primarily focused on their past performance and future potential. Many organizations have started to require that compliance sessions be completed some time prior to the annual performance review. In this case, employees are given refresher content and are recertified in their knowledge and skills. This is a better approach, but there may be many areas of competence to cover
- **special courses** are expensive or take time to develop and time away from work for each person attending. At some organizations, course attendance may be limited to those with a need to know new information or learn a new skill or those who will impart this new information/skill to others during the course of work

So what opportunities are left? There are actually many other opportunities to educate, train, and build awareness. Most of the methods have a short “shelf life.” That is, the message is short and the period in which the actual medium will be retained is short. But short messages can have lasting effects. Here are some low-cost options:

- **fliers or handouts** can be an effective way to communicate new information to members of the work force, as well as to the public. The handouts should be kept to one page (tri-fold) and should be easy to read, with illustrations and examples where possible. Use bulleted items to identify key points that you want the reader to remember

- **posters** are tried and true—and some say tired. Judicious posting, however, can help communicate new information or remind people of continually important information. Posters in staff bathroom stalls—if they are used occasionally with tasteful humor and are changed frequently—can be an option. Tent cards on cafeteria tables capture people's attention as well. With 82 HIPAA privacy and security standards, there are more than enough for a year's worth of weekly changes. Posters that are professionally designed and appropriately placed in public areas, such as waiting rooms, can also be effective ways to educate the public and demonstrate the value the organization places on privacy and security
- an **intranet Web page** is an increasingly popular option. This can provide an excellent, centralized source of information for members of the work force who simply need a reference. The intranet is an excellent place to locate the organization's policies and procedures, which should be well indexed for easy use. If there is Internet access, there can be links to other sites with further information. An intranet can also provide a good way to deliver fairly extensive coursework (that is, computer-based training). Short messages on the intranet's home page can be effective "what's new" reminders. Obviously, intranet and Internet access raise other privacy issues and should be carefully evaluated
- **short articles** in organization newsletters can be effective ways not only to deliver specific education and reminders, but to leverage other news into a privacy or security reminder. Be careful, however, to avoid sensationalizing a negative event or revealing too much about a potential vulnerability
- a privacy or security "moment" or "tip" during a **meeting or another training program** can be effective. These methods encourage both those charged with helping learners and the learners themselves to recognize that privacy and security are integral parts of our processes
- **promotional products**, such as mouse pads, stress balls, or flowers can also be effective. See-through mouse pads, where small reminder messages are inserted regularly, can be even more cost effective. Even traditional supplies, such as Post-it notes, can contain privacy and security messages
- **banners and screen savers** on computer monitors can also be effective—again, if they are changed often enough and are creative enough to catch the user's attention. Care must be taken, however, to avoid adding time to a log-on process
- weekly reminders sent via mass **e-mail** to all users in the organization can keep important privacy and security practices in front of the reader
- regardless of the media chosen to send your message, consider adopting a singular, strong motto that can be incorporated into every message

Finally, document all aspects of training. It may be helpful to have a compliance training database wherein date, topic, audience, and other information is tracked. Even fliers, e-mail, banners, and other media containing education, training, and awareness should be included. Attendance records may be kept with this database or in individual personnel files in accordance with organizational policy. See "[Sample Training Database](#)," above, for examples.

Too often when education, training, and awareness are being developed, the focus is on the content, with little attention given to the delivery method. To put this in a healthcare context: the privacy rule's estimated time of arrival is continuous; so give shots of adrenaline, but do not build up immunity!

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