

## HIPAA: The Time is Now

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Just when we think we have PPS under our belts, a new challenge appears on the horizon: the Health Insurance Portability and Accountability Act of 1996 (HIPAA). Preparing for HIPAA will be a lengthy and costly process for all health care providers. Agencies that have not begun preparations for HIPAA may be surprised to learn the depth and complexity of the regulations and the scope of the procedures they will have to enact to comply with HIPAA.

mation (PHI) often leaves the four walls of our physical buildings. This patient information must be protected and secured. Because of the uniqueness of home health care, agencies should use caution when relying on system implementation activities for agency HIPAA compliance.

Here are some activities you can do at your agency to start getting ready for HIPAA.

**Read the regulations** to understand the scope of the rules and the impact on your agency. You can find the regulations at [www.cms.gov/hipaa](http://www.cms.gov/hipaa).

**Learn the compliance dates** for the Transactions and Code Sets, Privacy Standards, and Security Standards. Agencies can apply for an extension to the compliance date for

designate this individual during the implementation phase to enhance the sense of ownership and understanding of HIPAA and your agency's specific policies and procedures for compliance.

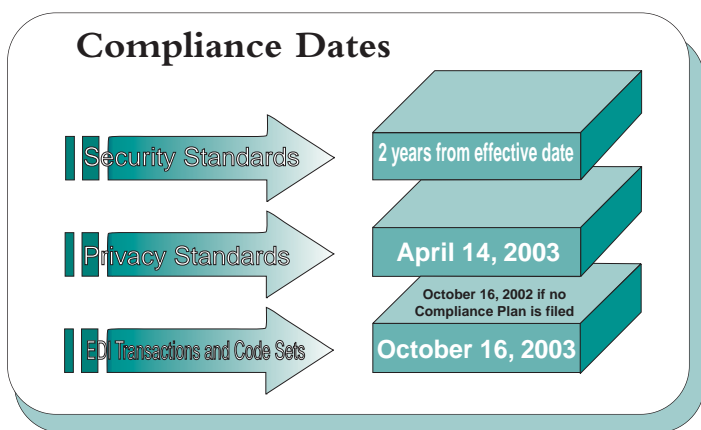
**Designate a HIPAA Implementation Team.** Regardless of the size of your agency, no one person can complete all of the activities required for compliance. Your HIPAA Team should be comprised of a core group of 4-6 employees representing a cross-section of functional areas within your agency.

**Start keeping a HIPAA Implementation Journal** to document your activities. This journal will allow you to demonstrate progress toward HIPAA compliance and assist the HIPAA Implementation Team to adhere to timeframes and expectations. In addition, the journal will document your good faith efforts towards compliance.

Regardless of where you begin, it is critical that your agency take the first steps to develop and implement policies and procedures for HIPAA compliance. While it seems so far in the future, April 2003 is really just around the corner.

**HIPAA Passport** is a Comprehensive HIPAA Implementation Plan prepared by a team of experts with outstanding expertise in home care operations, legal services, and information technology. With the **HIPAA Passport CD**, you just click and go with step-by-step approach to HIPAA Compliance.

Please e-mail Laura Gramenelles or call 800.653.4043 for more information.



Home health agencies that are hospital-based or affiliated with a larger system may already be involved in system activities for HIPAA implementation. While the principles are consistent across the health care continuum, there are many home care specific issues which must be considered for home health agencies. Because we provide our services in the home, protected health infor-

the EDI Transactions and Code Sets provided they submit a Compliance Plan to CMS. To view the Compliance Plan and filing instructions go to [www.cms.gov/hipaa/hipaa2/ascaform.asp](http://www.cms.gov/hipaa/hipaa2/ascaform.asp).

**Appoint a privacy official** to be responsible for developing and implementing your privacy policies and procedures. The Privacy Rule requires the designation of a privacy official. It is helpful to