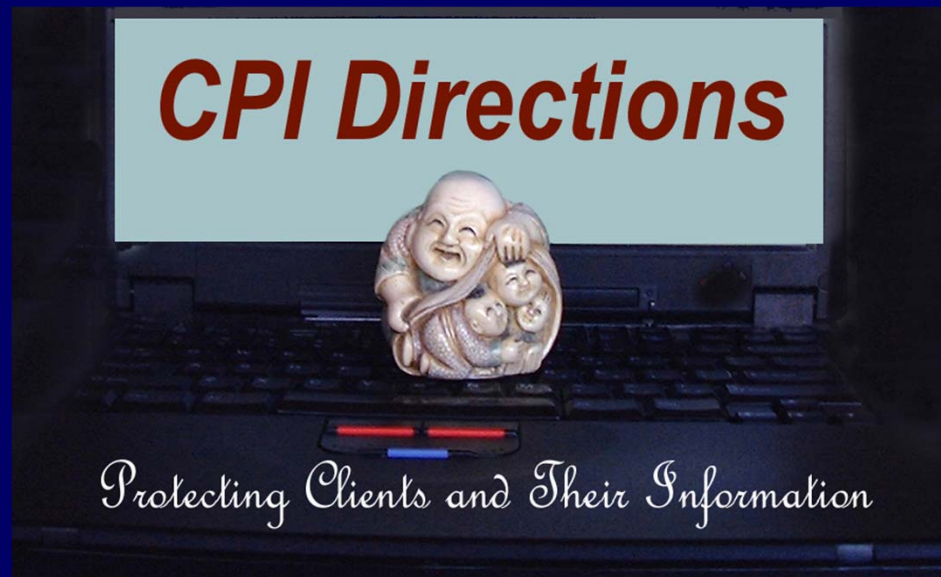


Over 38 Years of Experience in Delivering Consultant Services

Privacy & Security, Quality Management, Performance Improvement, Regulatory Affairs & Compliance, Accreditation & Licensure Preparation, Statistical Analysis & Research, and Information Technology for the full continuum of Health Care Entities and their Business Associates



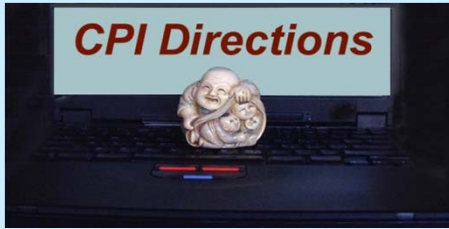
Contact:

**Consulting & Professional Services Department
10 West 15th Street, Suite 1922, New York, NY 10011**

professionalservices@cpidirections.com

(917) 763-6659

<http://www.cpidirections.com>



Protecting Clients & Their Information

HIPAA Implementation

**Preparation for Medicaid,
Medicare & State Audits**

**JCAHO / NCQA / URAC
Accreditation Preparation**

P&P Templates

Board & Staff Ed

1973

38

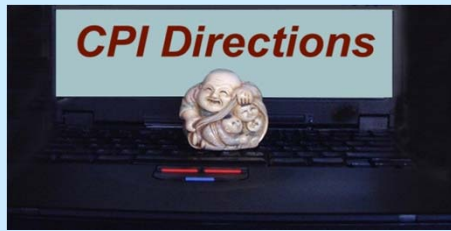
2011

Years

**QI/QM Software,
HIT, EMR, CPOS**

**Statistical &
Research Services**

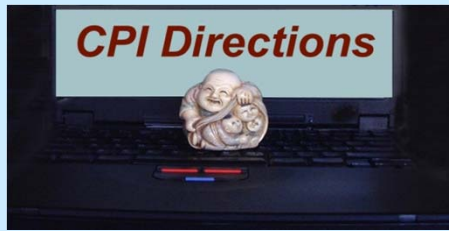
**Supports for Implementing Privacy, Security,
Regulatory Affairs, Quality Management, and
Performance Improvement Initiatives**



Protecting Clients & Their Information

For more than 36 years, the full continuum of health care providers & national organizations, health plans & insurers, and health care clearinghouses & billing services have depended on the staff and consultants at ***CPI Directions, Inc.*** to help establish and meet regulatory affairs and QM/PI priorities in a cost-effective manner.

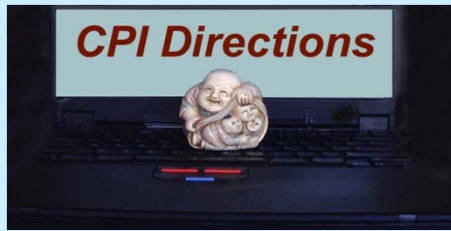
Further, because of our intimate knowledge of the data needs, billing, and reporting requirements of the health care industry, we are a beneficial partner for IT/Software developers & vendors seeking to provide tools for clinical communications (EMR, POS, CMV, secure email) claims & related transactions, health care operations, government reporting, academic and proprietary research, etc.



Protecting Clients & Their Information

CPI Experience in Entire Privacy & Security, Regulatory, and QM Environment

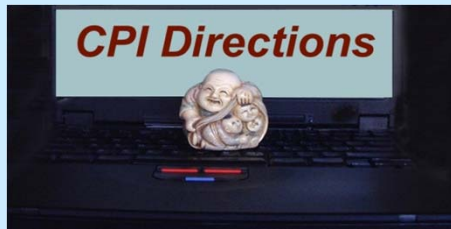
- Leadership for >100 accreditation surveys and regulatory audits: all organizations obtained or regained licensures and/or accreditations
- Cost-effective workflow, gap and risk analyses, and remediation reports for promoting compliance with regulatory and accreditor mandates and guidelines: HIPAA, NIST, GLB, Sarbanes-Oxley; Medicaid, Medicare, SAMHSA, FDA; OSHA, EPA, NFPA; JCAHO, NCQA, URAC, etc.
- Subject matter expertise for developing educational materials, and delivering seminars & workshops to all levels of workforce: Board to line staff
- Creation of proactive QM processes that significantly reduce payer *denials*, effectively increase the duration of licensure & accreditation periods, and facilitate the management of *sentinel events* and medical errors
- Clinical and administrative templates enabling 50% paper-work reduction
- Continuum of policies and procedures (templates) that integrate the requirements of multiple regulators and accreditors
- Provide testimony and guidance to DHHS and JCAHO



Protecting Clients & Their Information

CPI Experience with IT Systems, Software Development, Email, Internet

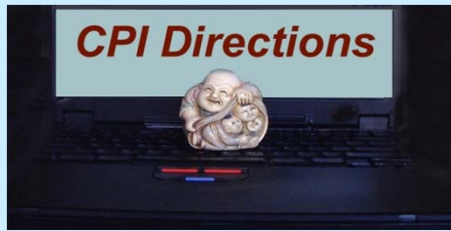
- Electronic medical records systems (EMRs, CMV, POS) to facilitate secure clinical communications & administrative reporting, and to enable compliance with HIPAA mandates for use, disclosure, and *tracking* of PHI
- Automated UR systems that reduce or eliminate *payment-denials* from Medicaid, Medicare, and other 3rd-party payers.
- Proprietary and patented secure-email systems (through partnerships developers and vendors)
- Computerized incident management applications that support provider efforts to effectively reduce reported client injuries.
- Electronic environment-of-care reporting systems that facilitate prioritizing and resolving issues with physical plant, safety, infection control, and patient quality of life, and foster a more caring and therapeutic environment.
- Internet advisory for apprising clients about trends in the politics of care, accreditation standards and government regulations, clinical outcomes, infection control and environment of care alerts, and other vital topics



Protecting Clients & Their Information

What Does HIPAA Mean?

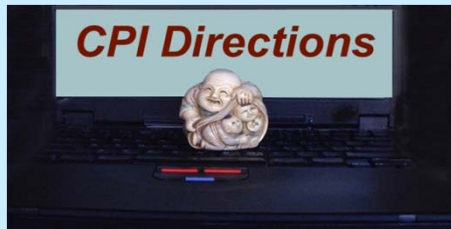
- **Impact on business practices:** Considerations for corporate structure & business associate contracts facilitating ***Privacy*** and ***Security***
- **Patient rights & controls:** *Privacy Notices*, authorizations, disclosure accountings, access to/amendment of ***PHI***, separation of employee ***PHI*** from HR records
- **Push toward standard electronic transactions:** Major restructuring of paper-related processes and staffing
- **Easier UR, claims management, gate-keeping** processes when providers are automated
- **Minimum Necessary Rule:** User-based, role-based access to, and disclosure of protected health information (***PHI***)
- **Discourage *bad* use of PHI:** Substantial monetary & criminal penalties for disclosure breaches; *Cultural Change*



Protecting Clients & Their Information

HIPAA Implications for Covered Entities

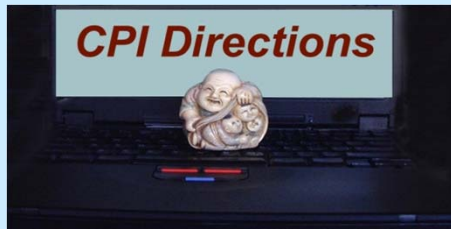
- Precluded from doing business with non-compliant Business Partners
- Electronic PHI: uses and disclosures for treatment, payment, and health care operations to comply with *Minimum Necessary Rule*
- Security of designated record sets (DRS) in all electronic formats and mediums, at-rest and in-transmission
- Data storage in standardized formats, and accommodating TCS data elements
- Impact on software & IT requirements, email, Internet, and complementary products
- Training supports, HIPAA-awareness, ongoing HIPAA revisions
- ePHI data-aggregation and/or reporting



Protecting Clients & Their Information

Minimum HIPAA Requirements

- Determine status as Covered Entity (Hybrid Entity? Health Plan? Clearinghouse?) and Business Associate relationships (Vendors? Attorneys & Accountants? IT and Software Supports? TPAs? etc.)
- Assign Privacy & Security Officials, resources and feed-back processes
- Develop, implement, and enforce “reasonable” P&Ps
- Awareness training & education for entire Workforce
- Examine and update Business Associate Contracts, Trading Partner Agreements, Data Use Agreements
- HIPAA-related tracking mechanisms
- Disaster recovery/Business continuation plans
- ***Gap Analysis & Risk Assessment***
- Remediation and on-going Continuous Performance Improvement (***CPI***) of privacy, security, and TCS matters

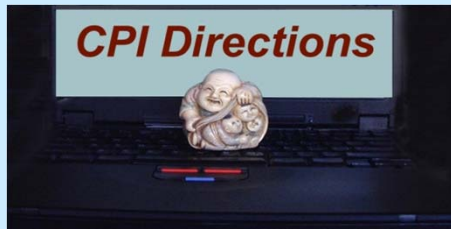


Protecting Clients & Their Information

HIPAA Security Risk Assessment

- ***What is “it” that needs to be protected, and where is “it” exposed?***
(ePHI? Applications? Systems? Equipment? Facilities? Off- or On-site?)
- ***From what do I want to protect “it”, and how is “it” exposed?***
(Patients? Workforce? Visitors? BAs? Intruders? Terrorists? Natural or Criminal Disasters? Systematic Obsolescence/Depreciation? Etc.)
- ***Are there consequences & potential harms of not protecting “it”?***
(Clinical? Legal? ROI? Monetary? Goodwill? Program existence? Etc.)
- ***What consequences am I willing and NOT willing to accept?***
(Clinical? Legal? ROI? Monetary? Goodwill? Program existence? Etc.)

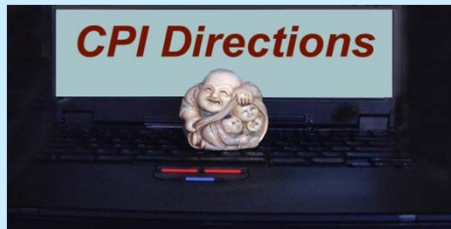
A basic HIPAA reality: As with other Regulatory schema or Accreditor standards, factual and complete answers to the questions, ***With what shall we comply?*** and ***What not?*** will be equally important.



Protecting Clients & Their Information

Information Needed

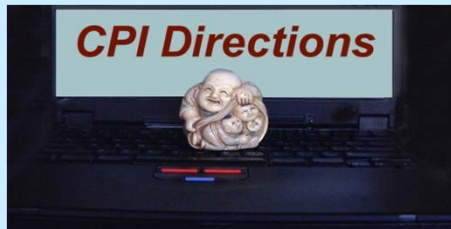
- Sharing of PHI within the Covered Entity's workforce, and between the CE and its Business Associates, government regulators, etc.
- Workflows, policies, and procedures
- IT Systems, software applications, email, Internet utilization, communications methods, & complementary products
- Data storage, backup, disaster planning, etc.
- Workforce awareness of HIPAA
- Audit trails, monitoring uses & disclosures of PHI
- Workforce clearance, physical security, and access controls
- Encryption, and complimentary or supplementary methodologies
- De-identification of PHI



Protecting Clients & Their Information

Internal Considerations

- Limited Resources: personnel, time, budget
- Ongoing priorities and responsibilities of workforce
- New Projects, unrelated to HIPAA
- Ability to remain current on HIPAA legislation and all related laws and published guidelines (NIST, FDA, GLB, FISMA, etc.)
- Supplementing or providing independent corroboration of Covered Entity's own findings
- Bringing a healthy degree of HIPAA-specialization to the process
- Possible legal protections with regard to the "discoverability" of the security gap analysis and risk assessment when a consultant is hired by the Covered Entity's legal counsel



Protecting Clients & Their Information

Methodology for Gap Analysis / Risk Assessment

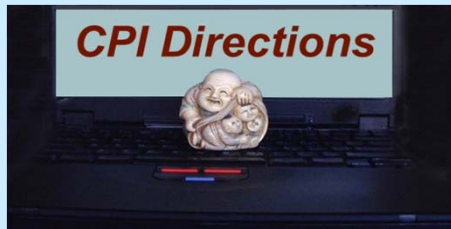
Analysis / Assessment

- Entities Assessment
- Business Associate (BA) & Trading Partner Assessment
- Transaction & Code Sets Assessment
- Assessment of IT, Software, Email, Internet, Communications, and Complementary Products
- Security Assessment
- Workforce Awareness Assessment

Deliverables

- Entities, BA, Trading Partner HIPAA Relationship Model
- High Level Gap Analysis
- Risk Assessment Scope & Schedule
- Risk Assessment
- Definitive List of Short-Term Compliance Actions*
- Project Plan for Long-Term HIPAA Compliance Actions*

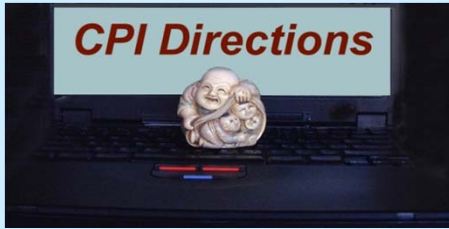
*Considering remediation recommendations for software & IT, complementary products, education & training, HIPAA documents, physical-plant, administrative P&P, subject matter expertise, etc.



Protecting Clients & Their Information

CPI's HIPAA Services & Work-Products

- Workflow & gap analysis, risk assessments for TCS, Privacy, Security rules
- Remote (email) and on-site Q&A service and HIPAA advisory
- Hip HIPAA Hippo PHI™ Posters & Workforce Reminders
- HIPAA Privacy Pamphlets for workforce, patients & their loved-ones
- Remediation reports & strategies
- Checklists, *roadmaps*, P&P templates, forms, data collection and tracking tools
- Statistical services, including limited data sets, de-identification of PHI
- Privacy Official & Security Official services for administering mandated P&P's
- Awareness training, seminars, workshops for all levels of the workforce
- Templates for Notice of Privacy Practice & Acknowledgement, Authorization Forms, Business Associate Contracts, Data Use Agreements
- HIPAA applications for tracking and reporting use and disclosure of PHI
- Development and implementation of electronic medical records
- Secure email systems

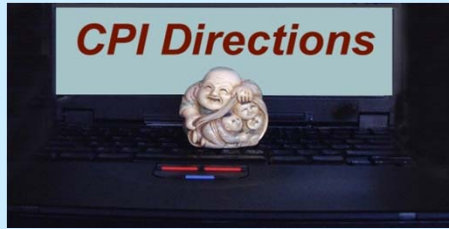


Protecting Clients & Their Information

Hip HIPAA Hippo PHI™ *Posters & Workplace HIPAA Reminders*

Featuring the Hip HIPAA Hippo™, CPI Directions, Inc. makes available a number of posters and workplace HIPAA reminders that continuously reinforce the HIPAA “awareness” concepts important for workforce compliance with the Rules!

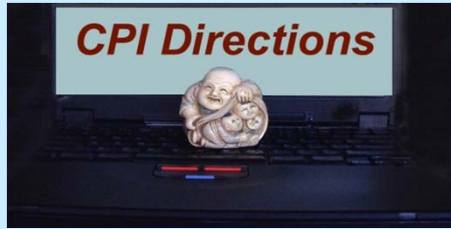




Protecting Clients & Their Information

Why Choose CPI Directions, Inc.?

- **Our solutions flow from first-hand experience.**
Unlike most consulting companies, ***CPI Directions, Inc.*** produces workable solutions, not just theoretical studies.
- **Our fees are sensitive to our clients' needs & budgets.**
We have traditionally been substantially less than the *Big 5* type consulting companies.
- **Our client-centered approach is second to none.**
Our ability to meet unique requirements and remain flexible when addressing our client's concerns, combined with our ability to provide creative solutions, make us an excellent partner.
- **Our power of partnership taps extensive and varied knowledge and experience bases**
All of our subject-matter-experts must adhere to our business philosophies and must deliver solutions in accordance with our evidenced-based standards for performance.



Protecting Clients & Their Information

“HIPAA is the catalyst that moves the health care industry from the paper- to the digital-age.”

For additional information, please contact:

Consulting & Professional Services Manager

CPI Directions, Inc.

10 West 15th Street, Suite 1922
New York, NY 10011

(917) 763-6659

professionalservices@cpidirections.com

<http://www.cpidirections.com>