

HIPAA Implementation Case Study: Disease Management

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Disease Management Association Definition

Disease Management is a multi-disciplinary, continuum-based approach to healthcare delivery that proactively identifies populations with, or at risk for established medical conditions, that:

- Supports the physician/patient relationship and plan of care
- Emphasizes prevention of exacerbations and complications utilizing cost-effective evidence-based practice guidelines and patient empowerment strategies such as self-management
- Continuously evaluates clinical, humanistic, and economic outcomes with the goal of improving overall health.



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DMAA Definition

Disease Management should contain the following:

- Population Identification process
- Evidence-based practice guidelines
- Collaborative practice model - includes MD and other providers
- Risk identification and matching of interventions with need
- Patient self-management education (eg. primary prevention, behavior modification programs, and compliance/surveillance)
- Process and outcomes measurement, evaluation, and mgmt.
- Routine reporting/feedback loop (may include communication with patient, physician, health plan and ancillary providers, and practice profiling)
- Appropriate use of information technology (may include specialized software, data registries, automated decision support tools, and call-back systems)



Covered Entity? Business
Associate? Provider?
HC Operations? Treatment?



The final regs are still unclear!!



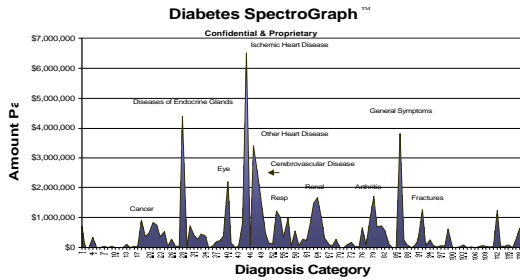
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LifeMasters' Current Position

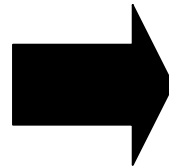
- DMOs are Business Associates of Health Plans and other covered entities
 - *Individual consents are not required*
- Population activities are protected under Health Care Operations
 - *This is very clear in the regs*
- Individual activities are protected under Treatment
 - *Although, the preamble states that healthplans do not do treatment*
 - *Most of our activities under this definition are done by healthcare providers (RNs, etc.) employed by LM*



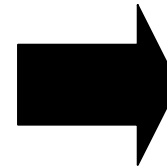
LM Service Model



Identification
Stratification
Enrollment



Physician
Decision
Support



Supported
SelfCare



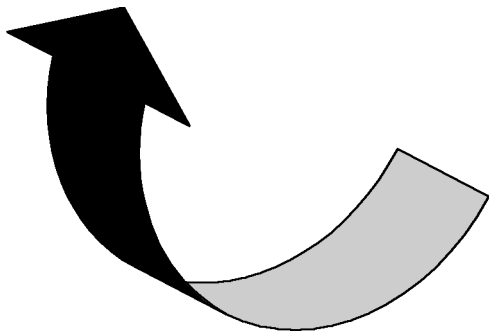
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Physician Decision Support Components

MD Exception reports



- Actionable information
- Early intervention
- Improved efficiency
- Trend reports

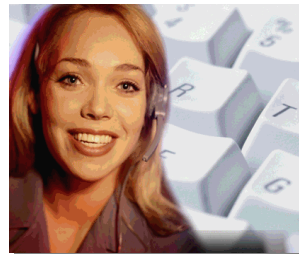


Initial patient training

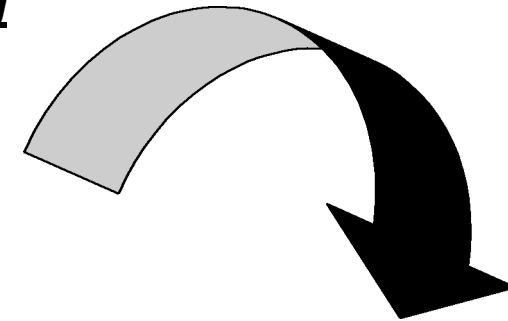
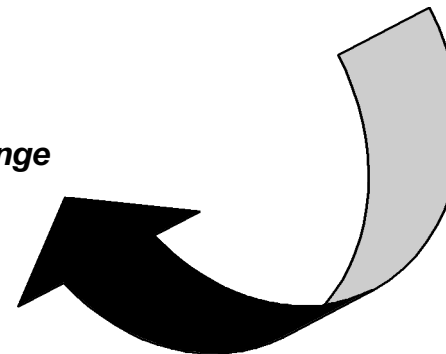


- Variety of options
 - Video, telephonic, group, in-home
- Monitoring skills
- SelfCare concepts

Alert generation



- MD-set thresholds
- Verified by LM nurse
- Feedback for behavior change

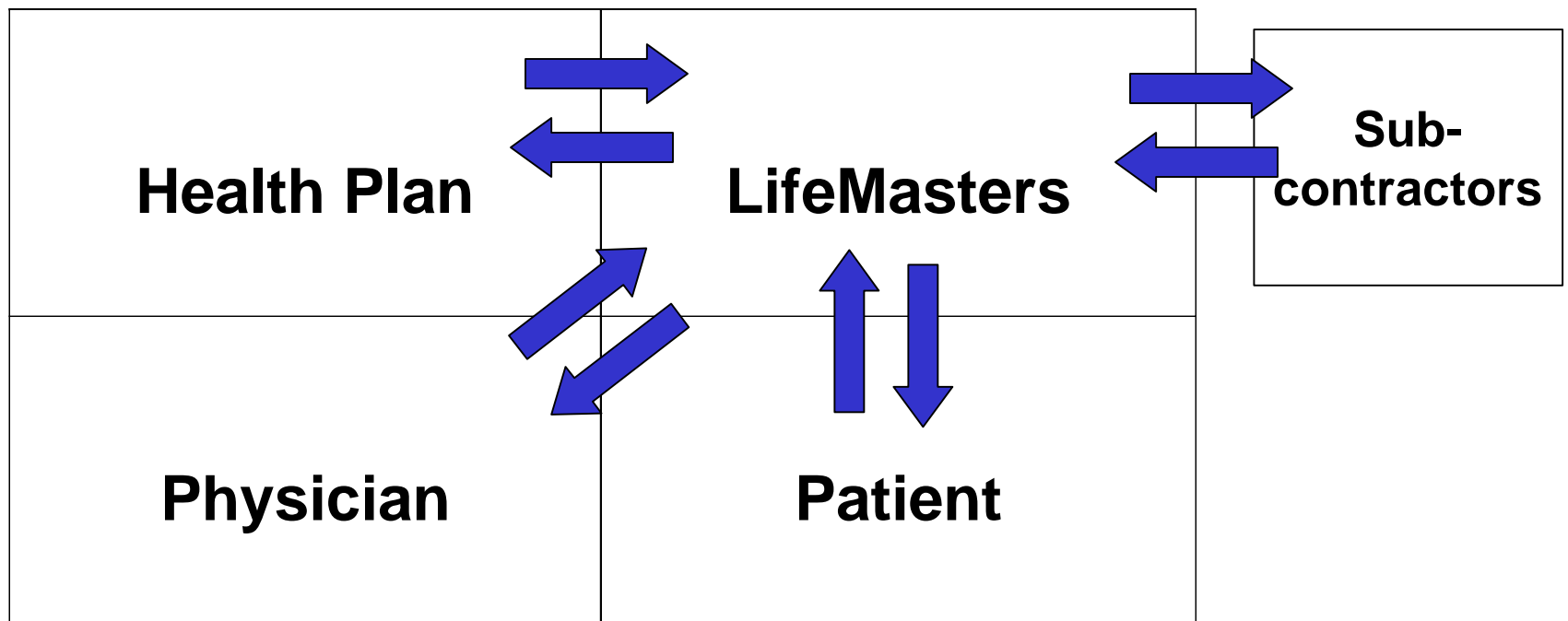


Biometric Monitoring



- Choice of easy to use methods
 - IVR, Web, Connected device
- Vital signs and symptoms
- Customized for co-morbidities

DM requires multiple and ongoing data exchange



Operations vs. Treatment

<u>DM Function</u>	<u>Data Flow</u>	<u>Operations</u>	<u>Treatment</u>
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Identification	HP⇒ LM MD⇒ LM	X	
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Stratification

• Initial	HP⇒ LM LM⇔ MD	X X	
• Ongoing	LM⇔ PT		X

Monitoring	PT⇒ LM LM⇒ MD		X X
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Coaching	LM⇔ PT		X
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Outcomes Reporting	LM⇒ HP	X	
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LM HIPAA Implementation Plan

- Appointed Chief Privacy Officer (MD)
- Established interdisciplinary committee
 - *Operations, technology, clinical, legal*
- Inventory of existing confidentiality P&Ps
 - *Who has access to what data (internally and externally)?*
 - *When/how to obtain patient consent for internal/external use of PHI*
 - *How to ensure patient access to his/her own data*



LM HIPAA Implementation Plan

- Contract review
 - *Ensure sub-contractor compliance (data analysts, outsourced call centers, etc.)*
 - *Ensure Business Associate relationship clear in customer contracts*
- Internal (and subcontractor) training on privacy P&Ps
- Ensure appropriate IT data security measures are taken



Data Security Measures

- Encryption of Data over the Internet
 - *128 bit secure sockets layer (SSL) level 3.0 and digital certificates*
 - *Complex password protection*
- Information Access Control
 - *Password protection*
 - *Ability to access, read, and modify data limited based on job requirements*



Data Security Measures

- Security of Records
 - *Several layers of firewalls*
 - *Intrusion detection*
 - *Audits by external vendors*
- Disaster Recovery
 - *Fault tolerant servers*
 - *Configured to survive processor, drive or LAN card failure without affecting service*
 - Multiple call centers and colocation facility to provide redundancy
 - Nightly backup and offsite storage

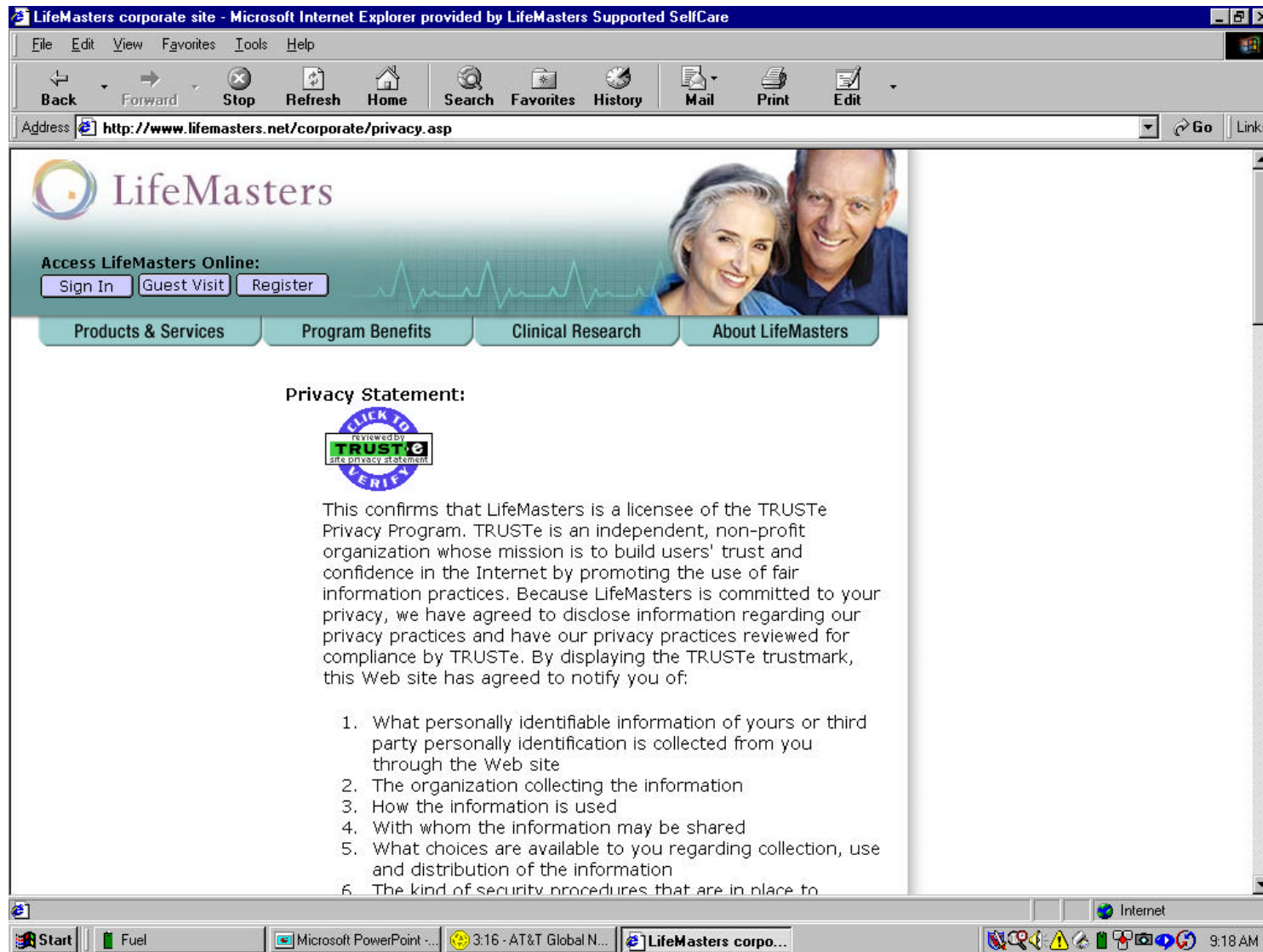


Data Security Measures

- All applications have full audit trail of who changed what
- No patient data transmitted via email
- Standard processing routines and formats for data processing, patient identification and risking
- Centrally performed security configuration
- Immediate removal of access for terminated employees
- Key card access to buildings and engineering test lab



Website Privacy Preceded HIPAA



The screenshot shows a Microsoft Internet Explorer browser window displaying the LifeMasters corporate website. The address bar shows the URL <http://www.lifemasters.net/corporate/privacy.asp>. The page features the LifeMasters logo, a navigation menu with links for "Products & Services", "Program Benefits", "Clinical Research", and "About LifeMasters", and a "Privacy Statement" section. The privacy statement includes a TRUSTe logo and a list of six items regarding information collection and security procedures.

LifeMasters corporate site - Microsoft Internet Explorer provided by LifeMasters Supported SelfCare

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Conclusions

- DM companies/programs new enough that a lot of protections may already have been implemented
- Regardless of regs DM companies need to be particularly vigilant due to confusion with Marketing entities
- Best defense is a good offense - act like a covered entity as much as possible

