TRANSITION PLAN AND SCHEDULE

It All Works, Now Let's Get It in Use!

Transition

- A phase within the HIPAA project work plan that begins when testing is completed and ends when migration to HIPAA standards is complete.
- Includes:
 - Transaction sequencing
 - Issue resolution
 - Operations and Monitoring

Session Overview

- 3-0 Transition Plan & Schedule
- 3-1 Transaction Sequencing Plan
- 3-2 Transition Issues
- 3-3 Transition: Operations & Monitoring
- 3-4 Session Recap

Transition Plan

- Description
- Rationale
- Contents
- Creation and Maintenance
- Ownership
- Contingency Planning

Plan Description

- Portion of overall project plan
- Begins when readiness is achieved
- Covers activities involved in the migration to the HIPAA standards
- Specifies each major activity
- Describes tasks, sequence, relationships, resources, schedule, and accountability
- It is NOT just an Information Systems plan

Plan Description (2)

- Defines the sequence and schedule for the phase-in of all transactions for all provider types
- Depicts the migration of providers from current processes to the new HIPAA standards
- Shows the cut-over date after which pre-HIPAA formats are discontinued

Rationale

- So many transactions!
- So many provider types!
- So many other partners!
- So many pathways!
- It is not practical to flip the switch to standard processing on D-Day for all providers and all transactions at the same time
- Some phasing-in is highly recommended

Plan Contents

- Description of the scope of work needed to achieve successful transition
- All major activities and milestones
 - Provider and transaction sequencing, issue resolution, and monitoring
- Responsibilities and resources
- Documents strategies and decisions
- Includes outreach to partners
- Answers the question: "How do I know when I am ready to begin operations?"

Plan Contents Addressed By This Session

- Contingency Planning
- Transaction Sequencing
- Transition Issues
- Transition Operations and Monitoring

Plan Creation and Maintenance

- HIPAA project office (HPO) should be responsible for plan development
- Involve all affected parties (steering committee, IS department, policy staff)
- Use previous work plans, e.g., installation of a new MMIS
- Use industry models, e.g., WEDI/SNIP paper on sequencing
- Assure plan can be used to accurately track activities and that milestones are realistic
- Establish continuous monitoring plan

Plan Ownership

- HPO owns it (because it is not just an Information Systems plan)
- HPO assigns responsibility for tasks in the plan, and establishes reporting requirements
- HPO should track responsible parties against the milestones
- HPO works closely with I.S. and policy departments throughout project

Transition Failure Contingency Planning

- Necessity for plan
- Responsibility for plan
- Critical business processes
- Contingency options
- Plan detail
- Team training

Necessity for Plan

- Murphy's Law "If it can go wrong, it will":
 - Not all transactions may be ready by the compliance deadline
 - New processes may break down after prior process has been discontinued
 - Some providers may not be ready or are not in compliance with TPA
 - Translator may not handle increased volume after compliance deadline
- Note: Obtain legal opinion on contingency plans

Critical Business Processes

- Identify critical business processes
- Define and document possible HIPAA EDI failure scenarios for each critical business process
- Perform risk and impact analysis of each critical business process
- Define minimum acceptable level of output & services for each critical business process

Determine Contingency Options

- Identify alternatives; Assess the cost and benefit for each critical business process
- Select and document a single contingency plan for each critical business process
- Define and document triggers for activating contingency plans
- Establish a business continuity team for each critical business process
- Develop compliance deadline day (D-Day) strategy and procedures

Plan Detail

For each contingency, develop a detailed plan including:

- Triggers
- Who to notify
- Who does what
- How long to continue the contingency process
- How to monitor recovery process

Assign and Train Contingency Teams

- Identify team leaders and members for information services and business operations
- Assign extra staff to Help Desk for provider problems
- Train teams