

# The HITECH Act: High Impact on Covered Entities

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# Our Profile



Providence Health & Services is a non-profit organization with 45,000 employees that provides health care, community services and education in Alaska, Washington, Montana, Oregon and California.



# Our Profile

Providence includes 27 hospitals, more than 35 non-acute facilities, physician clinics, a health plan, a liberal arts university, a high school and numerous other health, housing and educational services.

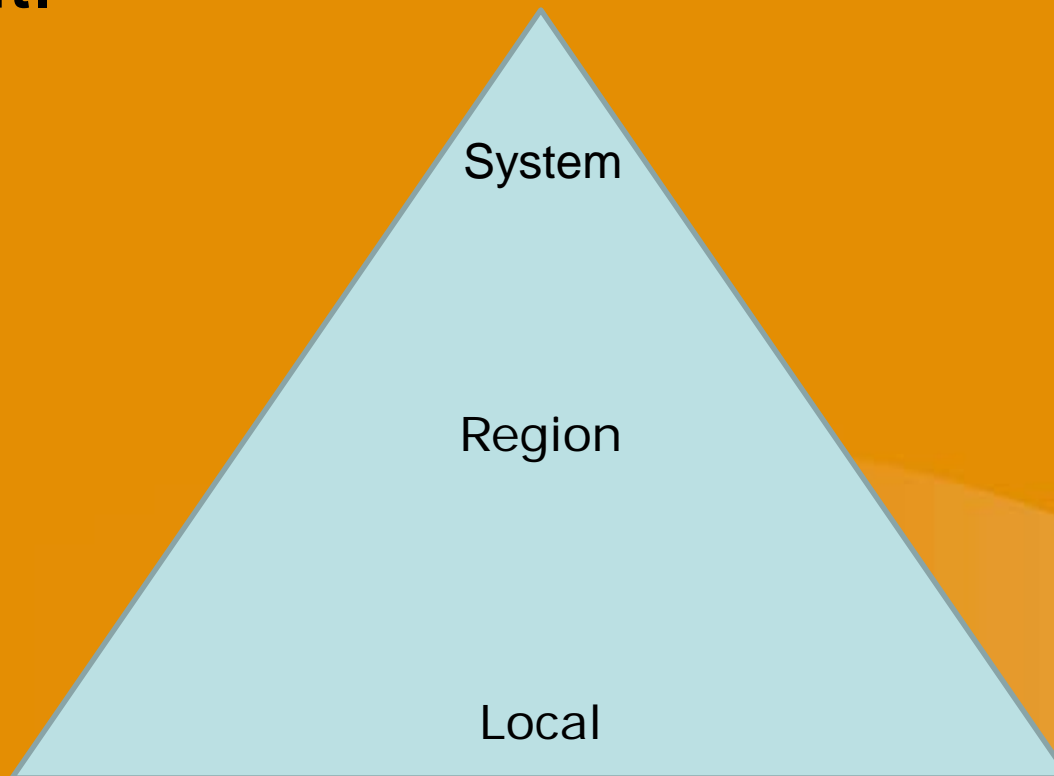


# Facts About Providence

- Sixth largest Catholic health system in U.S. in terms of net service revenue
- Largest health care provider in Alaska, Washington, and Oregon
- Largest employer in many communities

# Providence Culture

- Traditionally, Providence's operating principle is to make decisions closest to the patient.



# Contracting at Providence

- Contracting is very decentralized with each facility able to sign its own agreements
- No centralized contract management system



# Changes for Business Associates

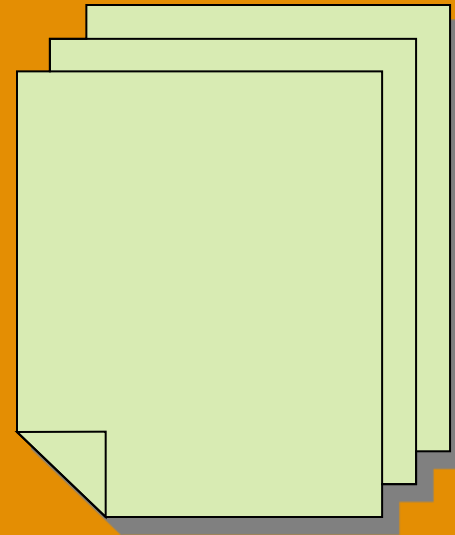
- If covered entities have to redo all BAAs, it will be a significant cost in terms of both time and money
- Major objective for Providence:  
Locating/identifying all our business associate agreements



# What Steps is Providence Taking?

Create an Excel spreadsheet to capture data on each BAA found, including:

- Business Associate:
  - Company Name
  - Contact Name
  - Mailing Address
  - Phone Number
  - Fax Number
  - Email Address
- Agreement Level (System, Region, Service Area, or Ministry)
- Ministry or Ministries Covered by Agreement
- Date Agreement Expires
- Ministry Privacy Contact Person & Phone Number
- Ministry Privacy Contact email address
- Date Addendum Signed



# What Steps is Providence Taking? cont

- System Integrity (Compliance) and Legal will draft an addendum to existing BAAs as well as a new BAA template to use going forward
- Ask leadership to identify a point person in each ministry to track down existing BAAs
- Addendum will be rolled out to each Providence point person (with supporting materials) to obtain signatures of BAs
- Requirement in breach policy for all contracts with BAs to incorporate breach reporting
- Update Business Associates policy

# The Final Word

- Some uncertainty still exists regarding whether existing BAAs must be updated
- There is a lot of work to be done here – updating BAAs, policies, and communication and education
- Time frames are unrealistically short to accomplish the work required

# Questions?

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