Health Information Compliance Alert

Training Strategies: Attain Optimal Compliance By Scripting Responses For Frontline Staffers

Scripting makes your life easier by putting everyone on the same page.

If all the world's a stage, then your frontline employees are your lead players. At least that's what your organization should be thinking if it's serious about achieving Health Insurance Portability and Accountability Act (HIPAA) compliance with the help of scripting.

"Scripting is very valuable" for a covered entity's office, says **Paula Thomas,** a consultant with **HIPAA Dental Solutions** in Tustin, CA. Makingsure that your staff can provide your patients with quick and accurate answers is vital.

So what is scripting? Essentially, scripting is preparing responses in anticipation of certain patient questions or scenarios, explains **Margret Amatayakul,** president of **Margret A. Consulting** in Schaumburg, IL.

"Scripting is presenting a potential conversation," adds Thomas. For example, when patients come into your office, your employees can use a script to present them with your notice of privacy practices or to answer common questions they may have regarding the notice of privacy practices (NPP), she maintains.

Benefit: Scripting is "obviously not a requirement of HIPAA," reports Amatayakul. Nonetheless, she says, "a number of people are finding that it's helpful because [HIPAA] is a pretty complicated law" and scripting allows CEs to put clear and practical answers into the hands of their frontline staffers.

To get your workforce ready for their starring roles, check out these scripting tips from several of our HIPAA experts.

Don't Let Scripting Replace Understanding

"You can have all the scripts in the world, but it's not going to prepare your employees for situations where they don't understand what the policies are," warns **Teri Ann Isacson,** an attorney with **Pingel & Templer** in West Des Moines, IA.

Strategies like scripting must go hand-in-hand with an entity's ability to train its staff in the ways of HIPAA, she maintains. If your frontline employees simply don't understand the fundamentals of privacy compliance or your organization's policies and procedures concerning patient privacy, then there's little hope that a script is going to provide them or your patients with any relief.

Remember: Scripting should supplement rather than supplant efforts to train your staff on privacy rules and procedures, insists Isacson.

Write Scripts With Staff Input

One of the first mistakes you're liable to make when preparing scripts for your organization is to create them without consulting your workforce members. Receiving staff input on scripts is vital "because you want to put it in their words," notes Amatayakul. After all, she states, it's your employees who are going to be most likely delivering these scripts, so they'd better be the ones most comfortable with what they're going to say.

"If [the script] is not in the language you currently use,then you're not going to feel comfortable saying it," stresses Amataykul. And if your staffers aren't comfortable with the wording, then the script they're stuck with will probably flop when delivered to your patients.

One way to harvest employee input for scripting is to present it as an educational activity to your staff, recommends **Gwen Hughes,** director of eHIM consulting services at Chicago-based **Care Communications.**

Training tip: Your organization can host round-table lunches during which groups of employees can be presented with a scenario and asked to brainstorm ways that they might respond to that situation. Essentially, then, the activity is designed to come up with the script -- or scripts -- "that work best for that group," says Hughes.

Be Consistent & Positive

The telltale sign -- and benefit -- of a good script is that it ensures what your frontline staffers communicate to your patients is both "consistent and appropriate," asserts **Sandra Nutten,** a senior management consultant at the Chi Group of **The Superior Consultant Company** in Ann Arbor, MI.

If a patient were to ask the same question to different receptionists from the morning, afternoon and evening shifts, then that patient should receive a similar response for each and every time the question was asked,says Nutten.

Keep it consistent: The answer a patient receives shouldn't depend upon whether the question was asked to "the fulltime staff person or the part-time staff person or the replacement helper," she explains. Scripts that help staffers appropriately and consistently deal with privacy concerns and questions reflect true effort on the entity's part to prepare their workforce, Nutten tells **Eli.**

Don't underestimate the power of a positive approach when it comes to delivering a scripted response, advises Thomas. She counsels clients "to take a positive and proactive approach to HIPAA," particularly when communicating information to patients.

Keep it positive: "The most important thing is to impress upon office employees that [HIPAA] is a good thing," says Thomas. The last thing you want is for your employees to grumble in front of your patients about what "a pain in the rear" HIPAA is, she states.

Both your employees and your scripts should positively emphasize that all the extra steps you've taken for privacy compliance are ultimately for the patient's benefit, Thomas maintains. With scripts in place, your employees should regularly communicate a "we've always protected you, and now we're doing even more" kind of attitude, she says.