

EXHIBIT 9.1. EVALUATION STRATEGY AND PLAN

Evaluation Strategy and Plan		<input checked="" type="checkbox"/> Initial Reaction <input checked="" type="checkbox"/> Learning Readiness <input checked="" type="checkbox"/> Execution <input checked="" type="checkbox"/> Business Outcome (Check boxes for applicable type of evaluation)					Date: _____
Project: <i>Big Sky Patient Privacy Training Project</i> Purpose of This Evaluation: <i>To determine business outcome</i>							
Section I. Follow-Up Evaluation							
A. Objectives and Strategy	B. Measures	C. Data Collection Method	D. Source of Data Collection	E. Timing of Data Collection	F. Results Will Be Reported to	G. Responsibilities	
A. Decrease current trend of patient privacy-related complaints. B. Achieve zero legal action associated with privacy-related matters.	A. Complaints reduced to zero within four months. B. Zero new legal action first year after training.	A. Track patient complaints weekly at each location. B. Review legal report.	A. Hospital records B. Legal report	A. Four months after training completed B. Monthly C. End of first year	A. CEO and all employees B. CEO and each location administrator C. CEO and all employees	Research analyst Ken Bynum	
C. Foster an image of compliance with the Privacy Act and HIPAA Privacy Rule.	C. Patient survey results rank compliance image at least in 95% range at end of one year.	C. Track two patient survey questions.	C. Quarterly patient survey				

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EXHIBIT 9.1. (Continued)

Section I. Follow-Up Evaluation						
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<p>Execution</p> <p>A. Follow the stipulations and requirements of the Privacy Act and HIPAA</p> <p>Privacy Rules in all activities when handling and releasing medical and personal information.</p> <p>B. Make proper decisions about handling and disclosure of information and require prior written authorization for disclosure as required.</p> <p>C. Implement action plan to eliminate old ineffective habits in work setting.</p>	<p>A, B, and C</p> <p>100% compliance within four months after training.</p>	<p>Group managers at each facility conduct spot audits to look for compliance and noncompliance.</p> <p>Group managers ask frequent questions about action items that were developed during training and recognize employees who are implementing their action plan to end ineffective habits.</p>	<p>Group managers</p>	<p>During first week after training to four months</p>	<p>Informally as agenda item at managers' meetings</p>	<p>Group managers</p> <p>David Martinez and David Xue follow up with phone calls to small sample of group managers to gain insight to execution to success and issues. Put executive briefing together and seek time on agenda at group manager and other staff meetings.</p>

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EXHIBIT 9.1. (Continued)

Section II. Readiness Evaluation						
A. Objective(s)/ Strategy	B. Measures	C. Data Collection Method	D. Source of Data Collection	E. Timing of Data Collection	F. Results Will Be Reported to	G. Responsibilities
Performance Readiness Learning Objectives A. Review tool kit HIPAA and Privacy Act Rules. B. Work ten scenarios related to HIPAA and Privacy Rules. C. Work in teams to identify current ineffective habits related to privacy issues.	A. Score at least 85% on a twenty-item multiple choice questionnaire.	A. Written objective assessment	A. Written objective assessment	A. Near end of training delivery	A. Participants self score A. Range of scores and averages reported to management B. Participants	A. Facilitators
	B. Identify improper handling of patient information in eight of ten scenarios.	B. Observation checklist	B. Instructor observation	B. During training delivery	B. Participants	B. Facilitators
	C. Identify and document action items for ending ineffective habits.	C. Individual Action Plan form	C. Participants create plan and keep copy and instructor keeps copy	C. During training delivery	C. Not reported. Results are between participant and supervisor	C. Facilitator initiates and completes action plan

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EXHIBIT 9.1. (Continued)

Section II. Readiness Evaluation						
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<p>Performance Readiness AMR Strategy All supervisors at all locations reinforce elimination of old habits of staff leaving "in-work" privacy information unattended and in view of other parties.</p>	<p>A. Group managers ask frequent questions about action items that were developed during training and recognize employees who are implementing their action plan to end ineffective habits.</p>	<p>A. No additional data collection unless group managers detect problems during walk around spot audits.</p>	<p>A. Group managers</p>	<p>A. One week to four months after training</p>	<p>A. Informally reported at management meetings as an agenda item.</p>	<p>A. Group managers at each facility responsible for implementing AMR strategy.</p>
	<p>B. Group managers have a compliance implementation goal on their personal performance plan (PPP).</p>	<p>B. None. Senior management involved in enforcement.</p>	<p>B. N/A</p>	<p>B. N/A</p>	<p>B. N/A</p>	<p>B. Group managers responsible for establishing goal on PPP and follow-through. David M. follow-up to trigger AMR strategy with sample phone calls.</p>

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Initial Reaction A. Positive feedback on relevance and importance. B. Individuals identify ineffective habits.	A. Average at least 4.5 on five-point scale	A. Feedback questionnaire	A. Participants	A. At end of session	A. and B. Training staff and department coordinators	A. Facilitators
	B. At least 80% take away written action items to eliminate habits	B. Feedback questionnaire and forms collected	B. Participants	B. At end of session		B. Facilitators
Method to Isolate the Effects	A. Complaint reduction: Four-month trend before and after training.					
	B. Legal action: One-year trend before and after training.					
	C. Image of compliance: Change in average scores one year before compared to one year after training.					
Note: Client has no interest in isolating the effects of training, but wants to know the effects of the total compliance initiative including all actions that address the three business outcomes. Training dates are merely used as a starting and end point of the strategy rollout.						