Webinar Logistics

• The webinar will begin momentarily.

• For the duration of this webinar you will be in listen-only mode and your station will be muted.

• We welcome your questions, and you can submit them at any time during the Webinar by typing them in the “Questions” section of the GoToWebinar control panel.

• At the end of the presentation we will address your questions during our Q&A session.
NY Medicaid EHR Incentive Program, A CMS Promoting Interoperability Program

Security Risk Analysis (SRA)
Agenda

• Meaningful Use Objective 1: Protect Patient Health Information
• Safety Areas to Consider
• Common Considerations and Creating an Action Plan
• Resources
• Q&A Session

The Security Risk Assessment Tool is not intended to be an exhaustive or definitive source on safeguarding health information from privacy and security risks. For more information about the HIPAA Privacy and Security Rules, please visit the HHS Office for Civil Rights Health Information Privacy website.
Meaningful Use Objective 1: Protect Patient Health Information
What is a Security Risk Assessment?

Eligible Professionals (EPs) participating in the NY Medicaid EHR Incentive Program must conduct an accurate and thorough assessment of the potential risks and vulnerabilities to the electronic protected health information held by that EP.
What is a vulnerability?

“It is a flaw or weakness. It can be in system security procedures, design, implementation, or internal controls that could be accidentally triggered or intentionally exploited and result in a security breach or a violation of the system’s security policy.”
What is a threat?

“A threat is the potential for a person or thing to accidentally trigger or intentionally exploit a specific vulnerability.”
What is a risk?

“The U.S. Department of Health & Human Services describes risk as a combination of factors or events:

1. What is the likelihood that a given threat will trigger or exploit a vulnerability?
2. What is the resulting impact on the provider or organization?”
Time Requirement

The SRA MUST be conducted

Within the EHR reporting period calendar year

and

Prior to the Attestation Date
Objective 1 in MEIPASS

Objective (1): Protect Patient Health Information

Objective: Protect electronic protected health information (ePHI) created or maintained by the CEHRT through the implementation of appropriate technical, administrative, and physical safeguards.

Measure: Conduct or review a security risk analysis in accordance with the requirements in 45 CFR 164.308(a)(1), including addressing the security (to include encryption) of ePHI created or maintained by CEHRT in accordance with requirements under 45 CFR 164.312(a)(2)(iv) and 45 CFR 164.306(d)(3), and implement security updates as necessary and correct identified security deficiencies as part of the EP’s risk management process.

Have you conducted or reviewed a security risk analysis in accordance with the requirements in 45 CFR 164.308(a)(1), including addressing the security (to include encryption) of ePHI created or maintained by CEHRT in accordance with requirements under 45 CFR 164.312(a)(2)(iv) and 45 CFR 164.306(d)(3), and implemented security updates as necessary and corrected identified security deficiencies as part of the EP’s risk management process?

Yes ☐ No ☐

Security risk analysis completion date: _____________________________

Completed By: _____________________________

Relationship to Eligible Professional (EP): _____________________________
Security Areas to Consider
Security Areas

- Administrative
- Technical
- Physical
Security Areas: Administrative

- Administrative
- Technical
- Physical
Security Areas: Technical

- Administrative
- Technical
- Physical
Security Areas: Physical

- Administrative
- Technical
- Physical
Additional Considerations

Policies & Procedures = written documentation

Organizational Requirements = agreements with business associates and vendors
Common Considerations and Creating an Action Plan
Common Considerations

1. Define the scope
2. Identify potential threats and vulnerabilities
3. Assess the effectiveness of implemented security
4. Determine the likelihood of particular threats
5. Prioritize remediation or mitigation
6. Document your risk assessment
7. Review and update your risk assessment
8. Determine and assign risk levels

2020
Create an Action Plan
Based on the results of your Security Risk Assessment

1. Define the scope
2. Identify potential threats and vulnerabilities
3. Assess the effectiveness of implemented security
4. Determine the likelihood of particular threats
5. Prioritize remediation or mitigation
6. Determine and assign risk levels
7. Document your risk assessment
8. Review and update your risk assessment

2020 Department of Health
Program Integrity

Retain all supporting documentation for 6 Years

**Additional documentation may be requested, as needed, during the review process.**

For post payment audit guidance, contact:

hitech@omig.ny.gov
Resources
Office of the National Coordinator (ONC) website

- Security risk assessment tool
- Videos
- Top 10 myths of security risk analysis

Certified EHR Technology (CEHRT)

Required: 2015 Edition
Visit [https://chpl.healthit.gov/](https://chpl.healthit.gov/) to obtain your CEHRT ID.
Is your information up to date?

✓ **CMS Registration** including phone & email contacts

✓ Medicaid fee-for-service enrollment

✓ Payee affiliation
Visit our website
Security Risk Assessment Page
Resources

- NY EHR Incentive Program SRA Page and Tip Sheet [www.health.ny.gov/ehr](http://www.health.ny.gov/ehr)


- OCR [www.hhs.gov/ocr](http://www.hhs.gov/ocr)


- ONC NIST (National Institute of Standards and Technology) [http://www.hhs.gov/ocr/privacy/hipaa/administrative/securityrule/securityruleguidance.html](http://www.hhs.gov/ocr/privacy/hipaa/administrative/securityrule/securityruleguidance.html)
<table>
<thead>
<tr>
<th>Select</th>
<th>Types of Questions/Information</th>
<th>Email</th>
</tr>
</thead>
<tbody>
<tr>
<td>Option 1</td>
<td>ePACES, ETIN, MEIPASS Technical Issues, Enrollment</td>
<td><a href="mailto:meipasshelp@csra.com">meipasshelp@csra.com</a></td>
</tr>
<tr>
<td>Option 2</td>
<td>Calculations, Eligibility, Attestation Support and Review, Attestation Status Updates, General Program Questions</td>
<td><a href="mailto:hit@health.ny.gov">hit@health.ny.gov</a></td>
</tr>
<tr>
<td>Option 3</td>
<td>Public Health Reporting Objective Guidance, MURPH Registration Support, Registry Reporting Status</td>
<td><a href="mailto:MUPublicHealthHelp@health.ny.gov">MUPublicHealthHelp@health.ny.gov</a></td>
</tr>
</tbody>
</table>
Regional Extension Centers

NYC Regional Electronic Adoption Center for Health (NYC REACH) (inside the 5 boroughs of NYC)

- Website: www.nycreach.org
- Email: nycreach@health.nyc.gov
- Phone: 347-396-4888

New York eHealth Collaborative (NYeC) (outside the 5 boroughs of NYC)

- Website: www.nyehealth.org/services/meaningful-use/
- Email: ep2info@nyehealth.org
- Phone: 646-817-4101
EHR Incentive Program Survey

NY Medicaid EHR Incentive Program, a CMS Promoting Interoperability Program

Program Satisfaction Survey

The NY Medicaid EHR Incentive Program strives to deliver the best program experience. Please take a few minutes to complete this survey to help make program improvements.

1. How would you rate the phone and email support provided by the NY Medicaid EHR Incentive Program?

<table>
<thead>
<tr>
<th>Timelessness of response</th>
<th>Very Dissatisfied</th>
<th>Dissatisfied</th>
<th>Neutral</th>
<th>Satisfied</th>
<th>Very Satisfied</th>
<th>N/A</th>
</tr>
</thead>
<tbody>
<tr>
<td>Knowledge of staff</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Professionalism/Politeness</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Quality of resolution</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Overall experience</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

2. How would you rate the website features provided by the NY Medicaid EHR Incentive Program?

<table>
<thead>
<tr>
<th>Ease of navigation</th>
<th>Very Dissatisfied</th>
<th>Dissatisfied</th>
<th>Neutral</th>
<th>Satisfied</th>
<th>Very Satisfied</th>
<th>N/A</th>
</tr>
</thead>
<tbody>
<tr>
<td>Trustworthiness of content</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Usefulness of content</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Format of resources (e.g. PDF, video, etc.)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Timeliness of updates</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

3. How would you rate the webinars hosted by the NY Medicaid EHR Incentive Program?

Usefulness of content | Very Dissatisfied | Dissatisfied | Neutral | Satisfied | Very Satisfied | N/A |
<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Format of resources (e.g. PDF, video, etc.)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Timeliness of updates</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Q & A