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 One (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 risk analysis completion date: 
Completed By: 
Relationship to Eligible Professional (EP):
Security Areas to Consider
Security Areas

- Administrative
- Technical
- Physical
Security Areas: Administrative
Security Areas: Technical
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

Define the scope → Identify potential threats and vulnerabilities → Assess the effectiveness of implemented security → Determine the likelihood of particular threats

Review and update your risk assessment → Document your risk assessment → Prioritize remediation or mitigation → Determine and assign risk levels
Create an Action Plan
Based on the results of your Security Risk Assessment

- Define the scope
- Identify potential threats and vulnerabilities
- Assess the effectiveness of implemented security
- Determine the likelihood of particular threats
- Prioritize remediation or mitigation
- Determine and assign risk levels
- Document your risk assessment
- Review and update your risk assessment
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

2020
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/ to obtain your CEHRT ID.
Is your information up to date?

- **✓ CMS Registration** including phone & email contacts
- **✓ Medicaid fee-for-service enrollment**
- **✓ Payee affiliation**

CMS Registration and Attestation System
www.ehrincentives.cms.gov/hitech/login.action
Visit our website
Security Risk Assessment Page

Security Risk Assessment (SRA)

Overview

For all EPs under the Medicare and Medicaid Electronic Health Record Incentive Programs (EHR Incentive Programs or EHRIPs), conducting a risk assessment of the potential risks and vulnerabilities to the electronic protected health information (ePHI) is required. This webpage provides guidance for conducting a Security Risk Assessment (SRA) in accordance with the Office of the National Coordinator for Health Information Technology (ONC) Security Risk Assessment (SRA) Tool.

Note: An EP may opt to use an alternative SRA tool and service. It is the EP’s responsibility to ensure that the SRA conducted is compliant. It is recommended that the SRA tool be used to conduct an assessment, but it is not required. The tool is available as a set of downloadable Microsoft Word documents, and an optional software application is available on line, at no cost. The Word documents and the software application provide similar capabilities.

The SRA Tool is divided into three documents:

1. Administrative Security Questions (73 questions)
2. Technical Security Questions (45 questions)
3. Physical Security Questions (38 questions)

There is a total of 156 questions.

Important

- The SRA must be conducted within the same calendar year of the EHR reporting period and prior to the date of attestation.
- Effective payment year 2017, an EP must indicate the SRA completion date in the HITECH.

Additional Resources

- ONC SRA Tool Instructions
- SRA Template (PDF)
- SRA Template (PDF)
- SRA Template (PDF)
- SRA Template (PDF)
- SRA Template (PDF)

Visit our website
Security Risk Assessment Page

2020
Resources

• NY EHR Incentive Program SRA Page and Tip Sheet www.health.ny.gov/ehr

• CMS www.cms.gov

• OCR www.hhs.gov/ocr


• ONC NIST (National Institute of Standards and Technology) http://www.hhs.gov/ocr/privacy/hipaa/administrative/securityrule/securityruleguidance.html
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<th>Select</th>
<th>Types of Questions/Information</th>
<th>Email</th>
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<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>
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<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>
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<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>
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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?**

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<th>Very Satisfied</th>
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<td>Knowledge of staff</td>
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**2. How would you rate the website features provided by the NY Medicaid EHR Incentive Program?**

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<td>Timeliness of updates</td>
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**3. How would you rate the webinars hosted by the NY Medicaid EHR Incentive Program?**

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Q & A