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
# Commonly Used Acronyms

<table>
<thead>
<tr>
<th>Term</th>
<th>Description</th>
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<tbody>
<tr>
<td>CEHRT</td>
<td>Certified EHR Technology</td>
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<tr>
<td>CMS</td>
<td>Centers for Medicare and Medicaid Services</td>
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<tr>
<td>CQM</td>
<td>Clinical Quality Measure</td>
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<tr>
<td>EHR</td>
<td>Electronic Health Record</td>
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<tr>
<td>EP</td>
<td>Eligible Professional</td>
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<tr>
<td>ePACES</td>
<td>Electronic Provider Assisted Claim Entry System</td>
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<td>ETIN</td>
<td>Electronic Transmitter Identification Number</td>
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<tr>
<td>FQHC</td>
<td>Federally Qualified Health Center</td>
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<tr>
<td>MEIPASS</td>
<td>Medicaid EHR Incentive Program Administrative Support Service</td>
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<tr>
<td>MU</td>
<td>Meaningful Use</td>
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<tr>
<td>MURPH</td>
<td>Meaningful Use Registration for Public Health</td>
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<tr>
<td>PDF</td>
<td>Portable Document Format</td>
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<tr>
<td>NPI</td>
<td>National Provider Identifier</td>
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<tr>
<td>RHC</td>
<td>Rural Health Clinic</td>
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</tbody>
</table>

Department of Health 2021
Meaningful Use Objective 1: Protect Patient Health Information
What is a Security Risk Analysis?

Eligible Professionals (EPs) participating in the NY Medicaid EHR Incentive Program must conduct an accurate and thorough assessment of the potential vulnerabilities, threats, and risks 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?
Security Risk Analysis Completion Date

The SRA MUST be conducted

Within Calendar Year 2021

but

Can be completed after the date of attestation
Changes in MEIPASS

Objective One (1): Protect Patient Health Information

Due to the December 31, 2021 statutory deadline for issuing incentive payments, an EP may conduct a security risk analysis at any time during Calendar Year 2021, even if that is after the EP attests with New York Medicaid. An EP who has not completed a security risk analysis by the time of attestation will be required to attest that they will complete one by December 31, 2021. New York Medicaid may require EPs to submit evidence that the security risk analysis has been completed as promised, even after the incentive payment has been issued.

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(1)(1), including addressing the security (to include encryption) of ePHI created or maintained by CEHRT in accordance with requirements under 45 CFR 164.312(1)(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(1)(1), including addressing the security (to include encryption) of ePHI created or maintained by CEHRT in accordance with requirements under 45 CFR 164.312(1)(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 ☐

Do you plan to conduct or review a security risk analysis in accordance with the requirements in 45 CFR 164.308(1)(1), including addressing the security (to include encryption) of ePHI created or maintained by CEHRT in accordance with requirements under 45 CFR 164.312(1)(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 no later than December 31, 2021?

- Yes ☑
- No ☐

I understand that I am required to complete a Security risk analysis no later than December 31, 2021, in accordance with the requirements in 45 CFR 164.308(1)(1), including addressing the security (to include encryption) of ePHI created or maintained by CEHRT in accordance with requirements under 45 CFR 164.312(1)(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 no later than December 31, 2021.

I hereby agree to keep such records as are necessary to demonstrate that I met all Medicaid EHR Incentive Program Requirements for the Security risk analysis for a minimum of ten years from the date of my signed attestation.

Estimated security risk analysis completion date: 

[ ]

Address relationship to CEHRT Professional (EP):

[ ]

No

Prevent

Return to Meaningful Use Objectives

Next
Security Areas to Consider
Security Areas

Administrative

Technical

Physical
Security Areas: Administrative
Security Areas: Technical

- Administrative
- Technical
- Physical
Security Areas: Physical

- Administrative
- Technical
- Physical
Additional Considerations

Organizational Requirements

Policies and Procedures
Common Steps and Creating an Action Plan
## Common Steps

<table>
<thead>
<tr>
<th>Define</th>
<th>Define the scope</th>
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</thead>
<tbody>
<tr>
<td>Identify</td>
<td>Identify potential threats and vulnerabilities</td>
</tr>
<tr>
<td>Assess</td>
<td>Assess the effectiveness of implemented security</td>
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<tr>
<td>Determine</td>
<td>Determine the likelihood of identified threats</td>
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<tr>
<td>Assign</td>
<td>Determine and assign risk levels</td>
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<tr>
<td>Prioritize</td>
<td>Prioritize remediation or mitigation</td>
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<tr>
<td>Document</td>
<td>Document your risk assessment</td>
</tr>
<tr>
<td>Review and update</td>
<td>Review and update your risk assessment</td>
</tr>
</tbody>
</table>
Create an Action Plan
Security Risk Assessment Tool

The Security Risk Assessment Tool and its associated User Guide (PDF) can be found on the Office of the National Coordinator (ONC) website.
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.
Program Reminders & Resources
Security Risk Analysis Specific Resources

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

• OCR [www.hhs.gov/ocr]


• ONC NIST (National Institute of Standards and Technology) [http://www.hhs.gov/ocr/privacy/hipaa/administrative/securityrule/securityruleguidance.html]
Program Integrity

Retain all supporting documentation for 6 Years

For post payment audit guidance, contact: hitech@omig.ny.gov

or review the materials available on our website
https://www.health.ny.gov/health_care/medicaid/redesign/ehr/audit/
Certified EHR Technology (CEHRT)

- Visit https://chpl.healthit.gov/ to obtain the CEHRT ID
Program Resources

LISTSERV

YouTube Tutorials

Website

Webinars

Survey
<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>

Phone: 1-877-646-5410
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: 646-619-6400

2021
# EHR Incentive Program 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></th>
<th>Very Dissatisfied</th>
<th>Dissatisfied</th>
<th>Neutral</th>
<th>Satisfied</th>
<th>Very Satisfied</th>
<th>N/A</th>
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</thead>
<tbody>
<tr>
<td>Timeliness of response</td>
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<td>Knowledge of staff</td>
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<td>Professionalism/Politeness</td>
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<td>Quality of resolution</td>
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<td>Overall experience</td>
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</tbody>
</table>

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

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

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