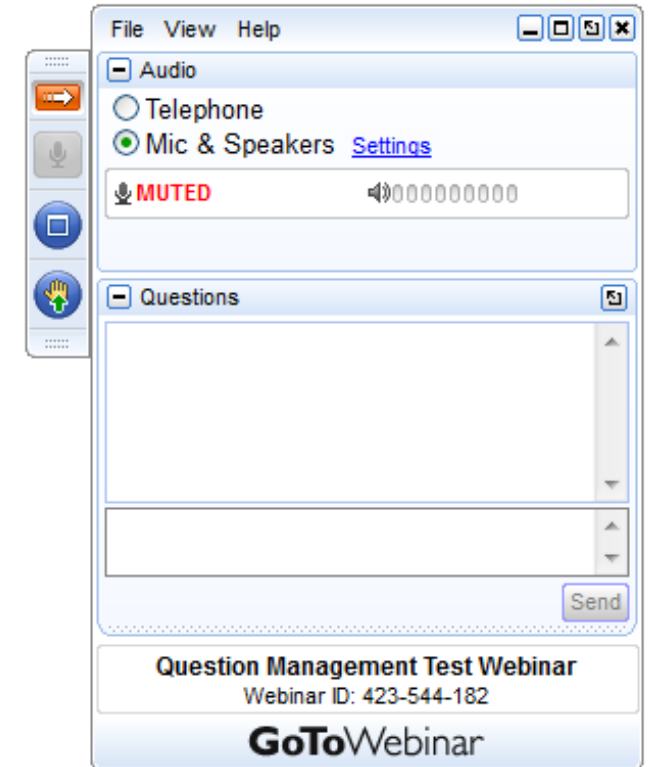


# Webinar Logistics

- 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.





Department  
of Health

# **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

2020

# 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 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:

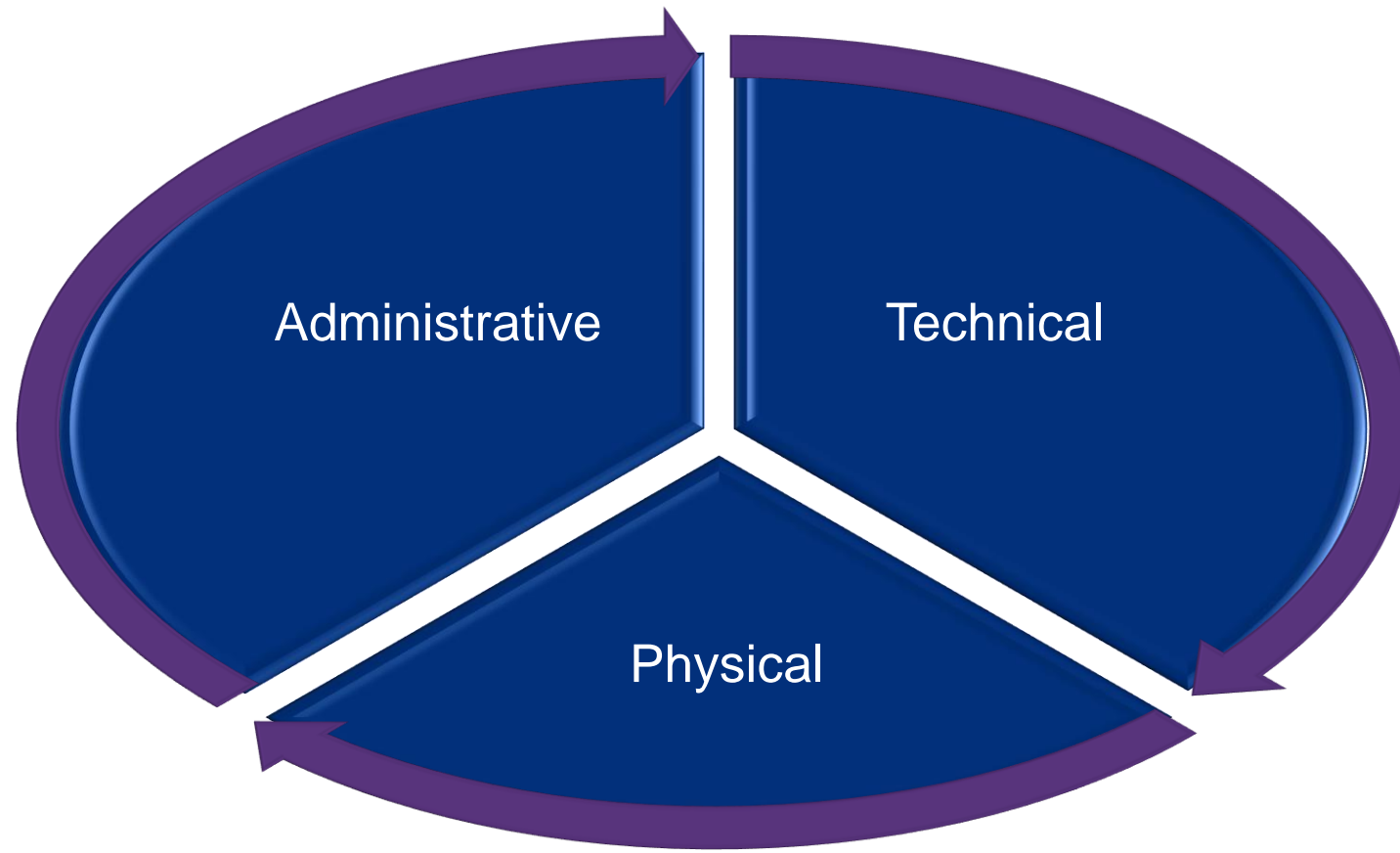
Relationship to Eligible Professional (EP):

[Previous](#) [Return to Meaningful Use Objectives](#) [Next](#)

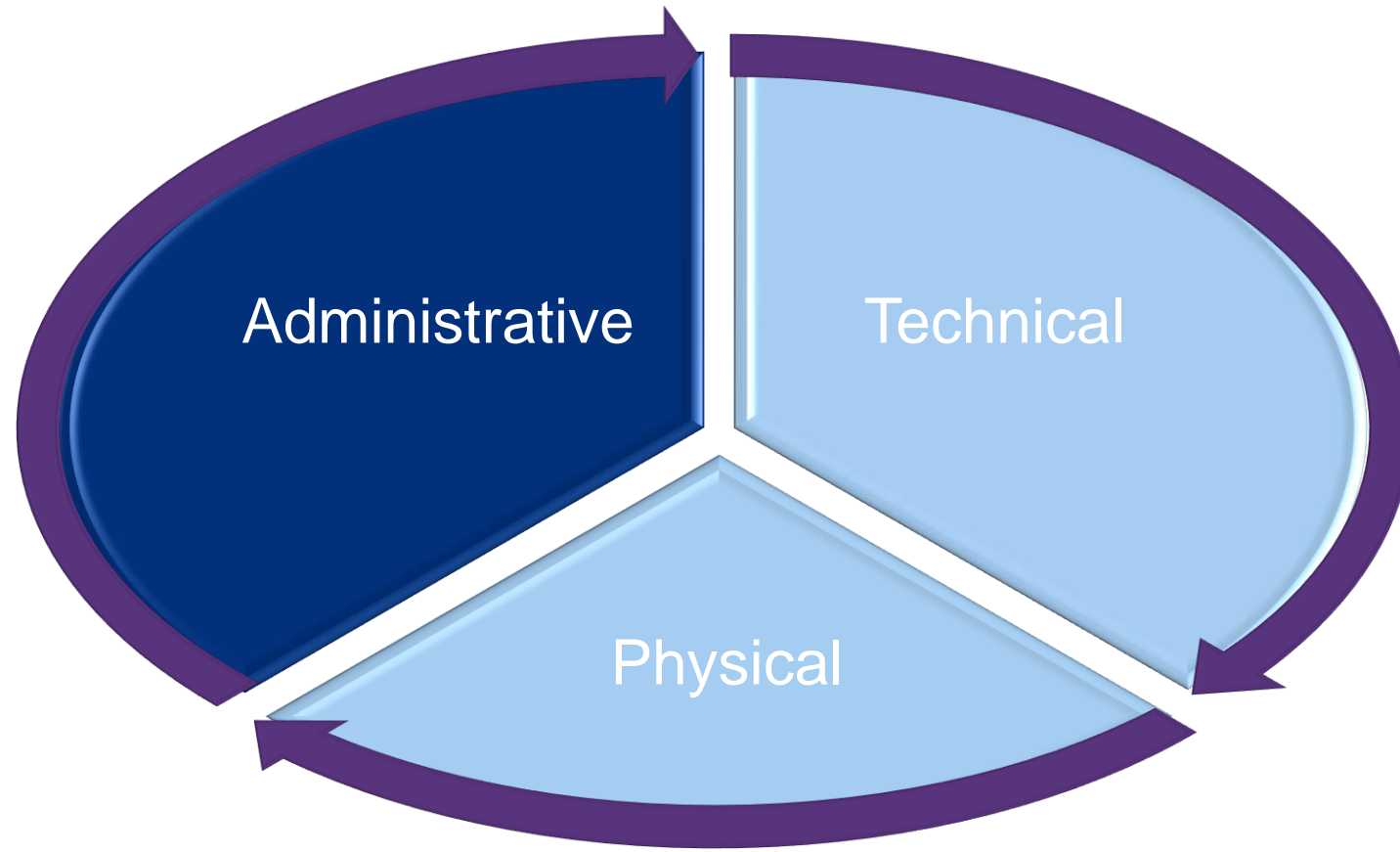
# Security Areas to Consider

2020

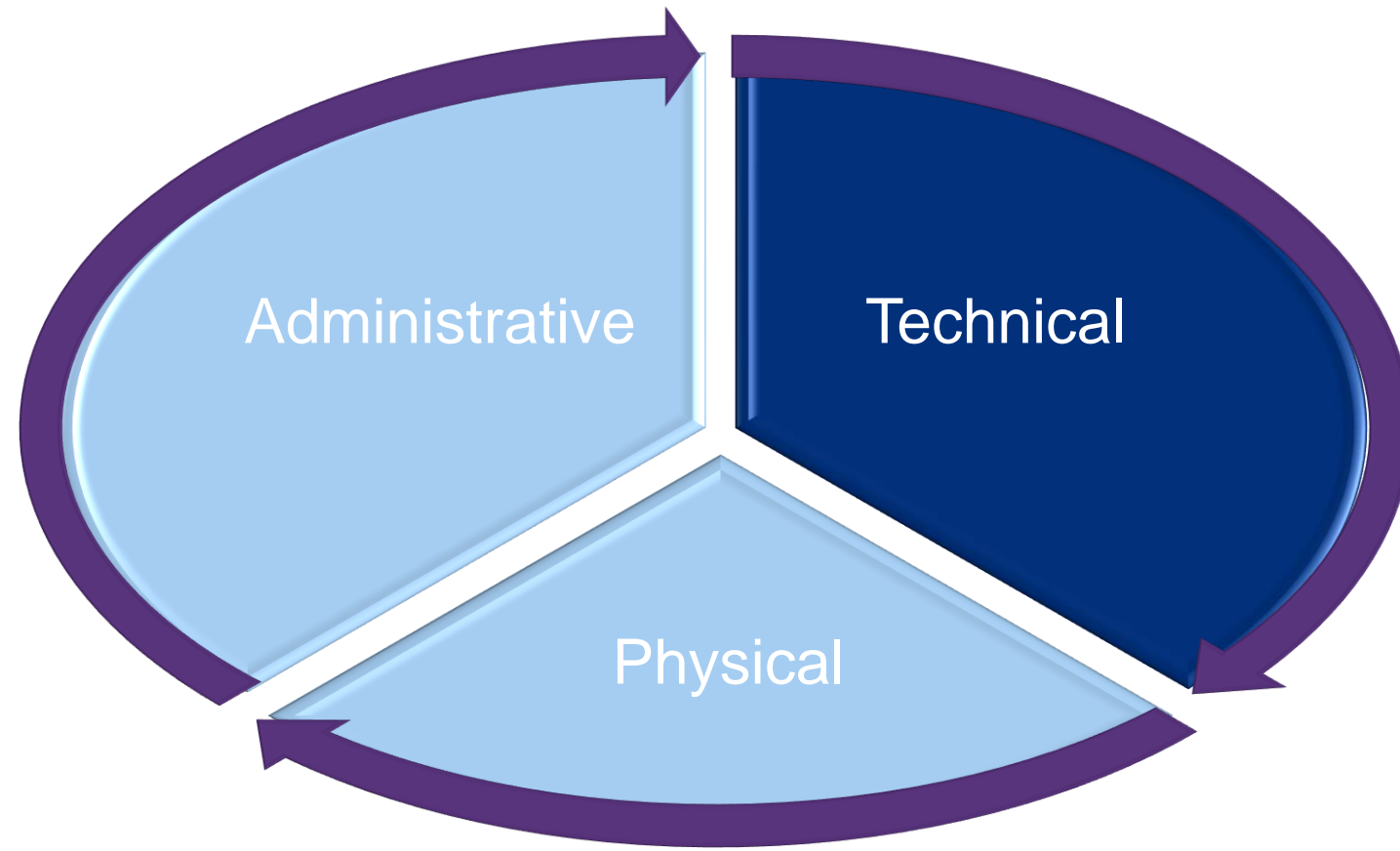
# Security Areas



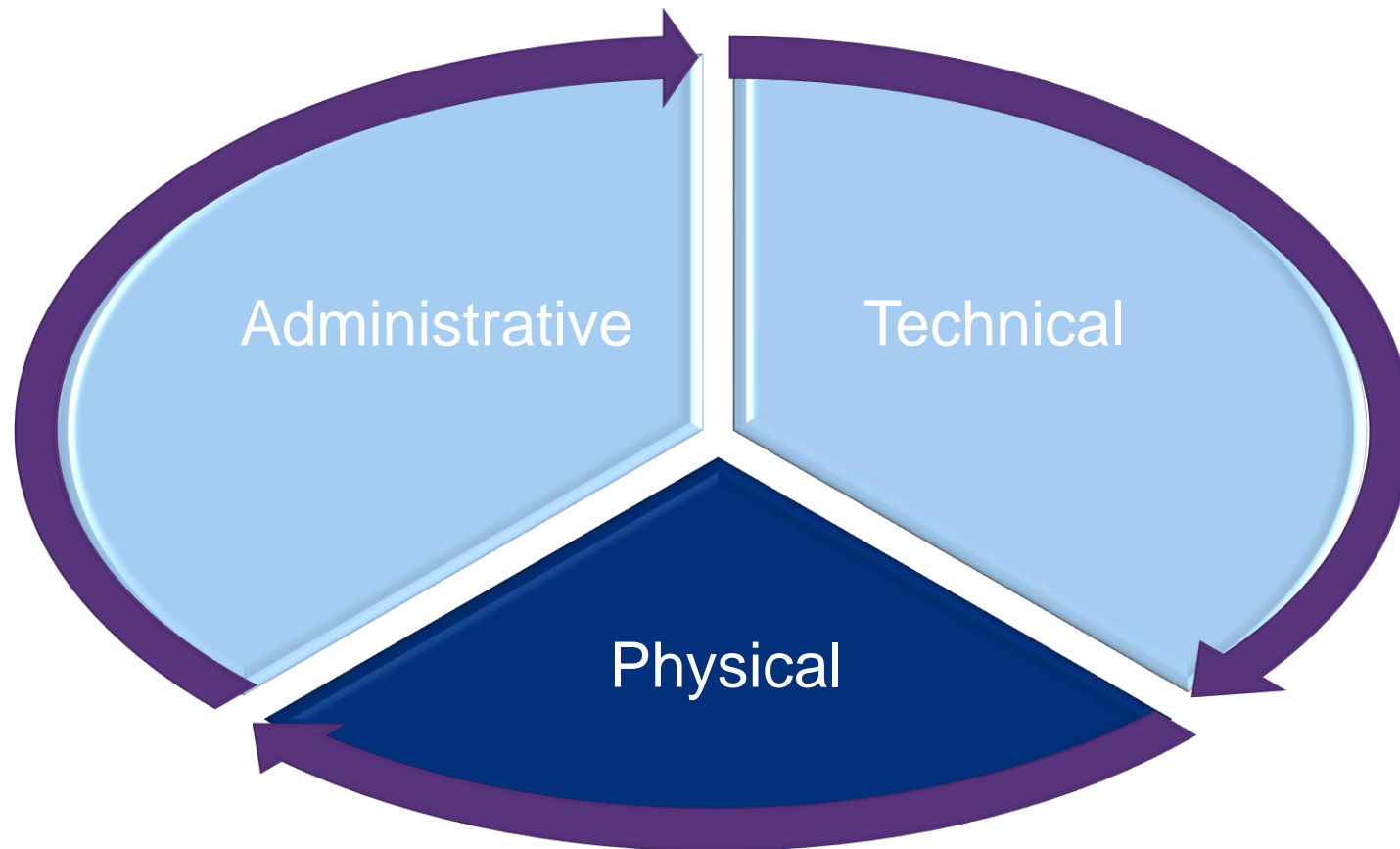
# Security Areas: Administrative



# Security Areas: Technical



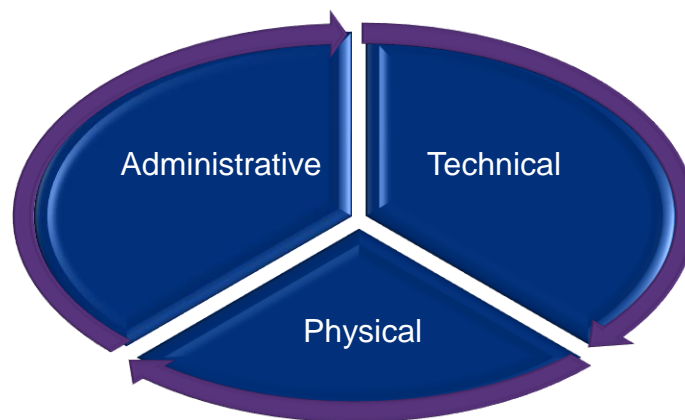
# Security Areas: Physical



# Additional Considerations

Policies & Procedures = written documentation

Organizational Requirements = agreements with business associates and vendors

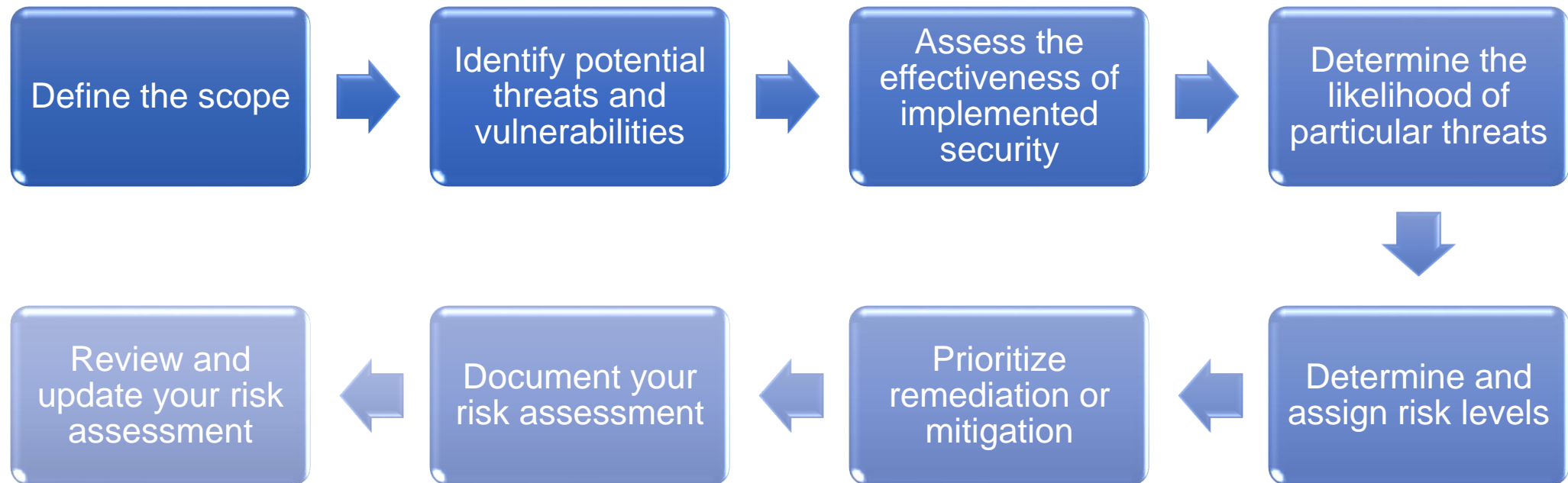




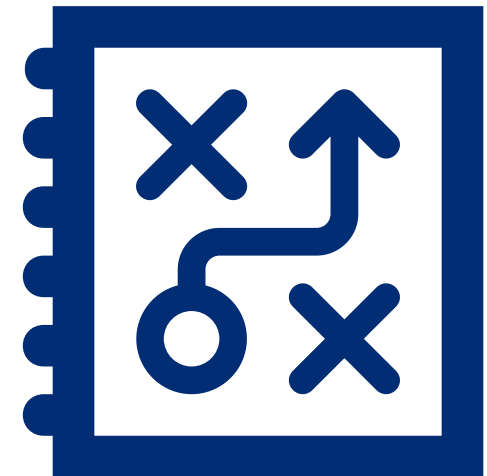
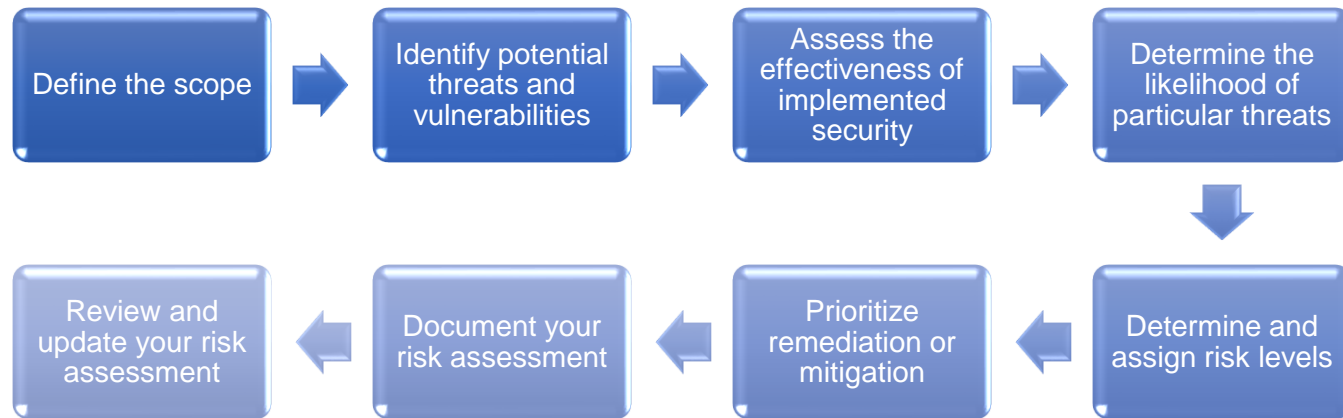
# Common Considerations and Creating an Action Plan

2020

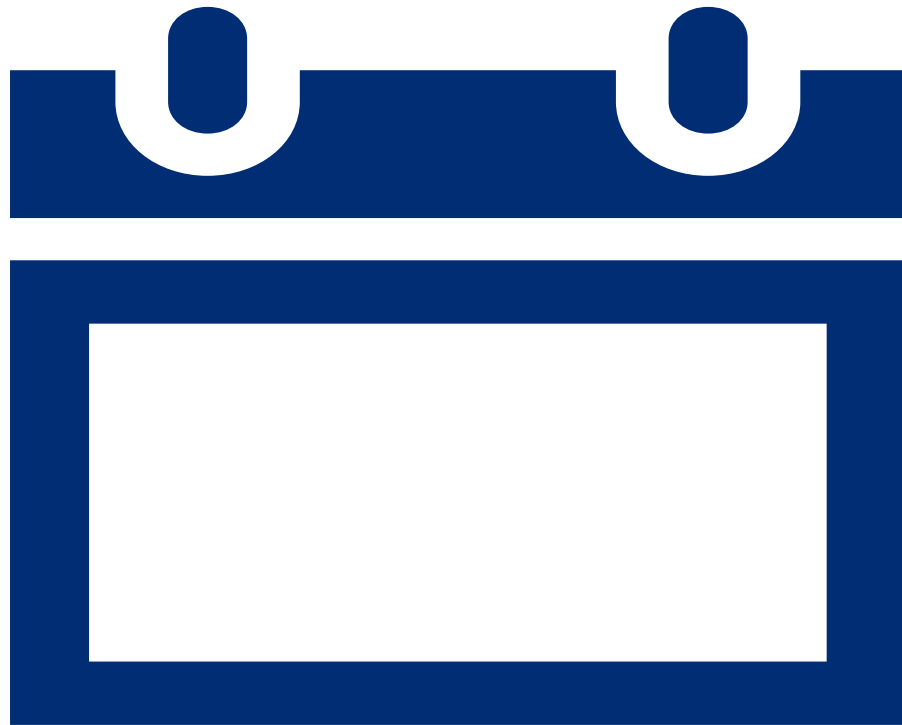
# Common Considerations



# Create an Action Plan Based on the results of your Security 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](mailto:hitech@omig.ny.gov)

# Resources

2020

# Office of the National Coordinator (ONC) website

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

<https://www.healthit.gov/topic/privacy-security-and-hipaa/security-risk-assessment-tool>

# 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

Home Attestation Status Payment Information

Please validate your CMS Registration Information. If the information is incorrect contact CMS. If the information is correct please proceed.

**Registration Information**

CMS Registration ID : NPI :  
 Payment Year : TIN :

**Provider Information**

First Name : Middle Name :  
 Last Name : Suffix :  
 Provider Type : Dentist  
 Provider Specialty : Dentist

**Address**

Address :  
 City : STATEN ISLAND  
 State : NY Zip :  
 Phone : Ext :  
 Email :

**Identifiers**

Payee NPI :  
 Payee TIN/SSN :

**Exclusions**

No exclusions found

Begin Attestation



# Visit our website

## Security Risk Assessment Page

The screenshot shows the New York State Department of Health website. At the top left is the New York State logo. The navigation bar includes links for Services, News, Government, and Local. On the right, there are links for Location and Translate. Below this is a purple header with 'Department of Health' and sub-navigation for Individuals/Families, Providers/Professionals, Health Facilities, and Search. The main content area is titled 'Security Risk Assessment (SRA)' and includes an overview, a note about alternative tools, information about the SRA tool's development, and a list of three documents: Administrative Security Questions (73 questions), Technical Security Questions (45 questions), and Physical Security Questions (38 questions). There is also an 'Important' section with two bullet points and an 'Additional Resources' section with three links to PDF documents. A sidebar on the left contains various utility links like 'NY Medicaid EHR Incentive Program', 'Home', 'Eligible Hospital Requirements', etc.

# Resources

- NY EHR Incentive Program SRA Page and Tip Sheet [www.health.ny.gov/ehr](http://www.health.ny.gov/ehr)
- CMS [www.cms.gov](http://www.cms.gov)
- OCR [www.hhs.gov/ocr](http://www.hhs.gov/ocr)
- ONC [www.healthit.gov/topic/privacy-security-and-hipaa/security-risk-assessment](http://www.healthit.gov/topic/privacy-security-and-hipaa/security-risk-assessment)
- ONC NIST (National Institute of Standards and Technology)  
<http://www.hhs.gov/ocr/privacy/hipaa/administrative/securityrule/securityruleguidance.html>

**NY Medicaid  
EHR Incentive  
Program  
Support Teams**

**Phone:  
1-877-646-5410**

Select	Types of Questions/Information	Email
Option 1	ePACES, ETIN, MEIPASS Technical Issues, Enrollment	<a href="mailto:meipasshelp@csra.com">meipasshelp@csra.com</a>
Option 2	Calculations, Eligibility, Attestation Support and Review, Attestation Status Updates, General Program Questions	<a href="mailto:hit@health.ny.gov">hit@health.ny.gov</a>
Option 3	Public Health Reporting Objective Guidance, MURPH Registration Support, Registry Reporting Status	<a href="mailto:MUPublicHealthHelp@health.ny.gov">MUPublicHealthHelp@health.ny.gov</a>

# Regional Extension Centers

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



Website:

[www.nycreach.org](http://www.nycreach.org)

Email: [nycreach@health.nyc.gov](mailto: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/](http://www.nyehealth.org/services/meaningful-use/)

Email: [ep2info@nyehealth.org](mailto: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?**

	Very Dissatisfied	Dissatisfied	Neutral	Satisfied	Very Satisfied	N/A
Timeliness of response	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Knowledge of staff	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Professionalism/Politeness	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Quality of resolution	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Overall experience	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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

	Very Dissatisfied	Dissatisfied	Neutral	Satisfied	Very Satisfied	N/A
Ease of navigation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Trustworthiness of content	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Usefulness of content	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Format of resources (e.g. PDF, video, etc.)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Timeliness of updates	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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

# Q & A

2020