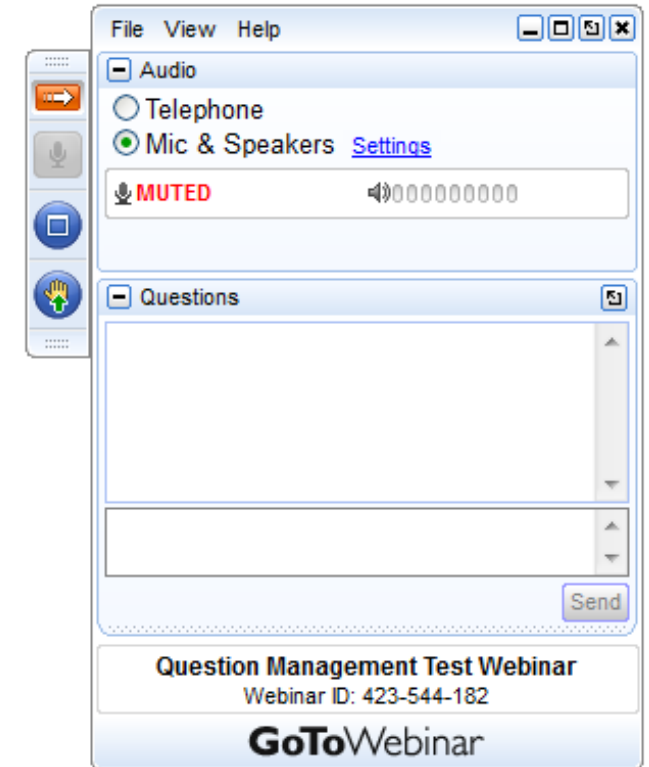


# Webinar Logistics

- 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

# Commonly Used Acronyms

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

# Meaningful Use Objective 1: Protect Patient Health Information

2021

# 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


 Department of Health  
 Information for a Healthy New York

Welcome : RPARIH11 [Logout](#)

**Medicaid EHR Incentive Program**  
**For Eligible Professionals (EPs) and Eligible Hospitals (EHs)**

Home
Attestation
Status
Payment Information

EP Summary

### Objective One (1): Protect Patient Health Information

Due to the December 31, 2021 statutory deadline for making 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(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

**\* Do you plan to 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. **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(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).

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 six years from the date of my signed attestation.

Estimated security risk analysis completion date:

Will be completed by:

Relationship to Eligible Professional (EP):

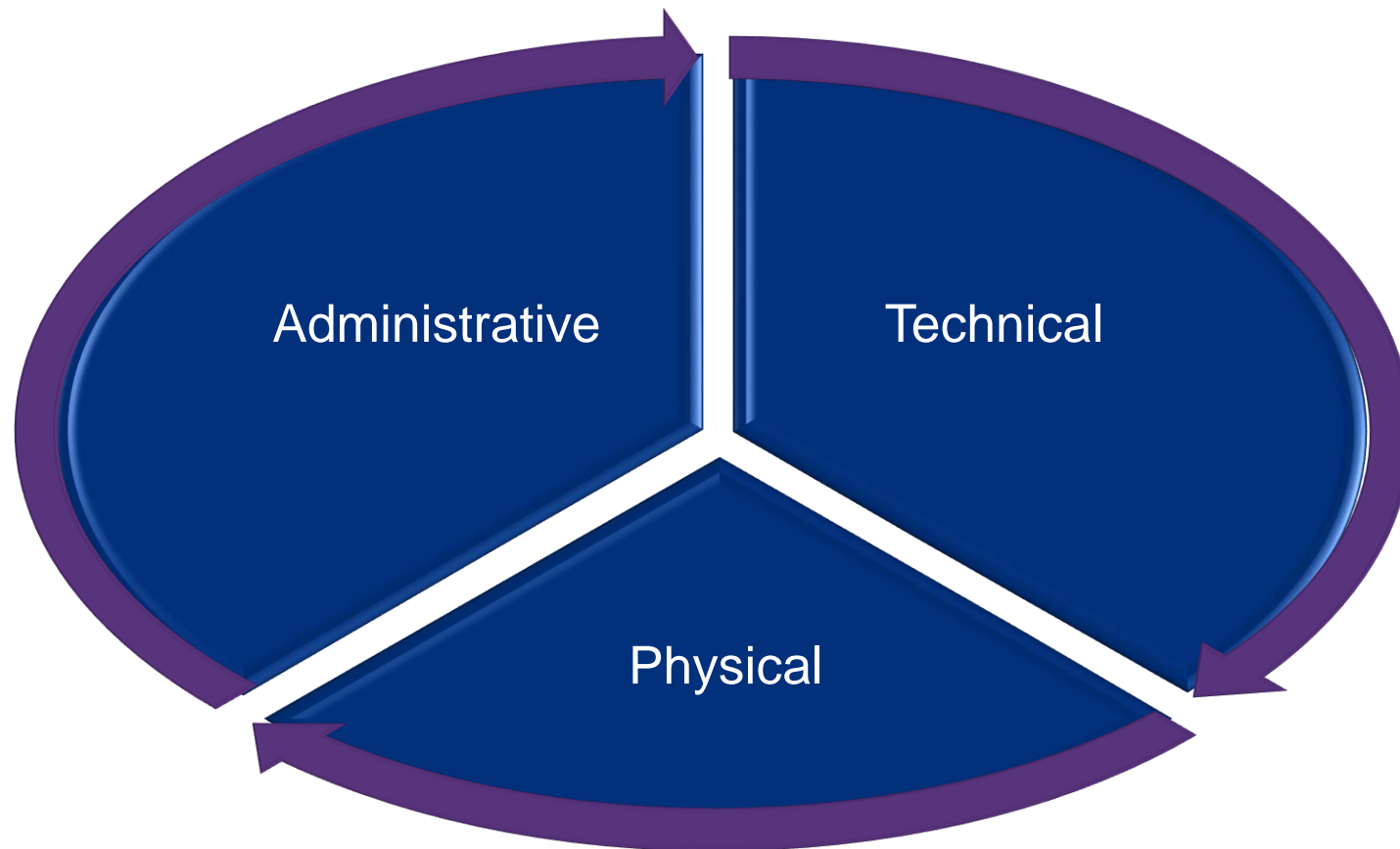
Previous
Return to Meaningful Use Objectives
Next

2021

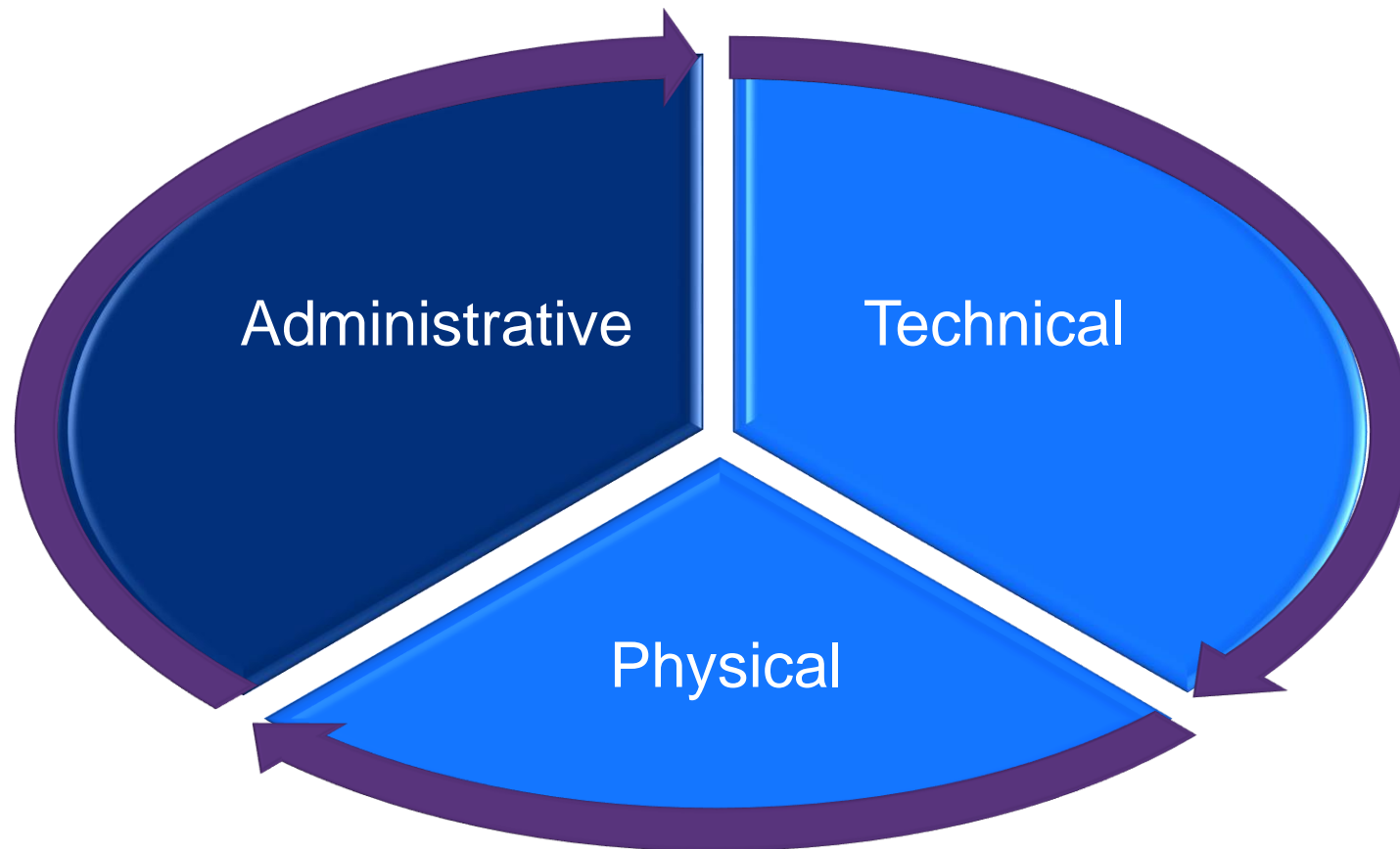
# Security Areas to Consider

2021

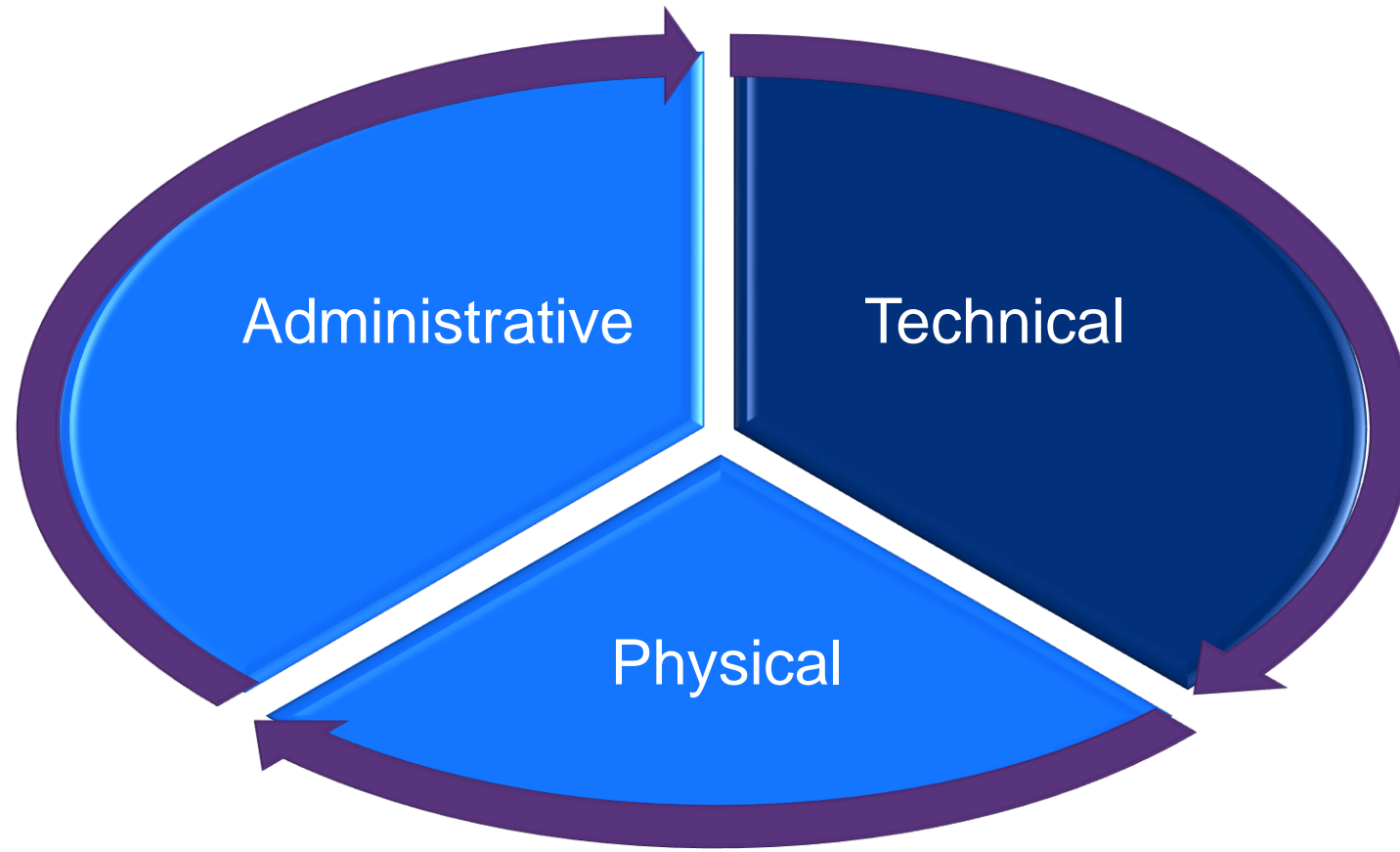
# Security Areas



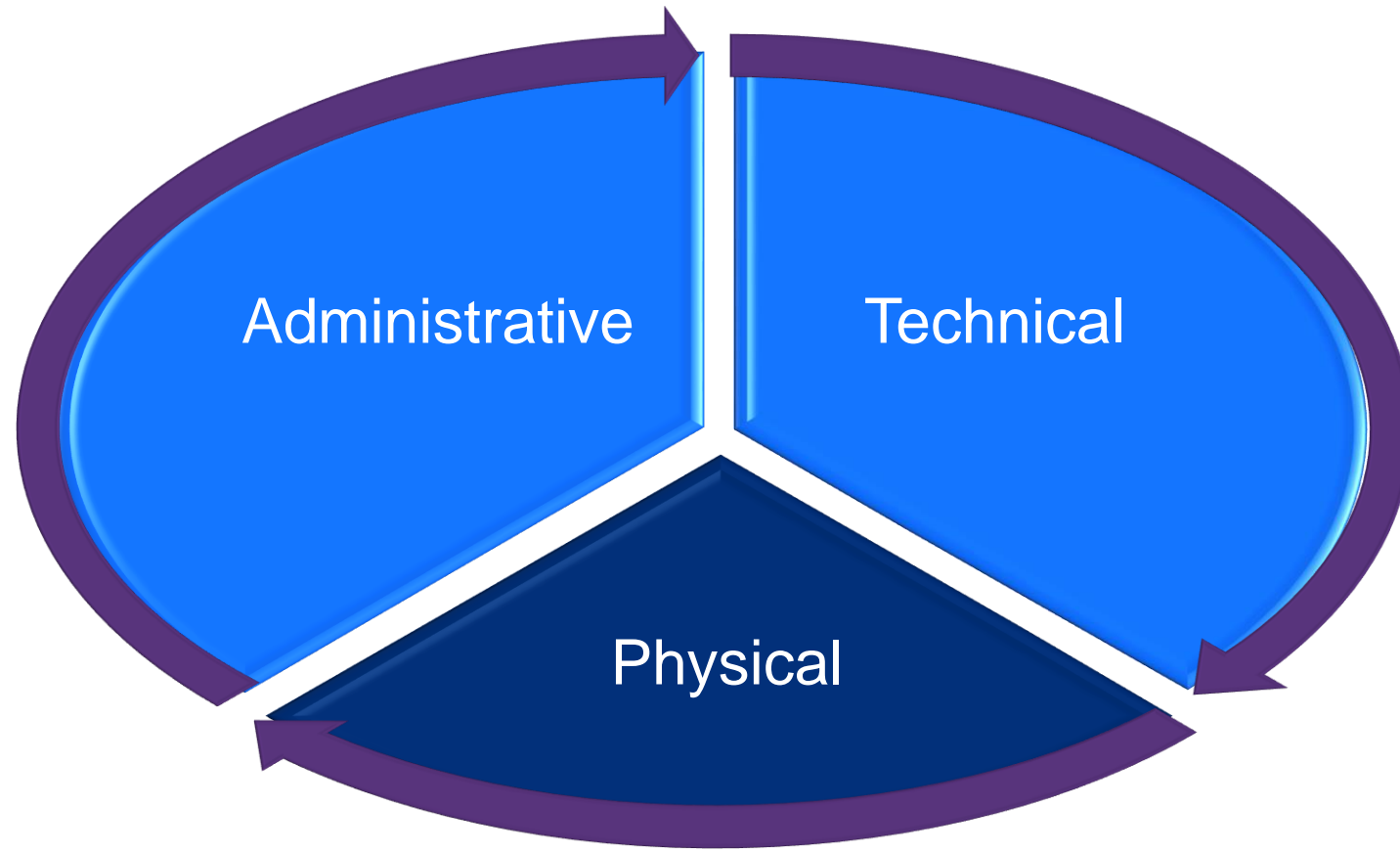
# Security Areas: Administrative



# Security Areas: Technical



# Security Areas: Physical





# Additional Considerations



**Organizational Requirements**

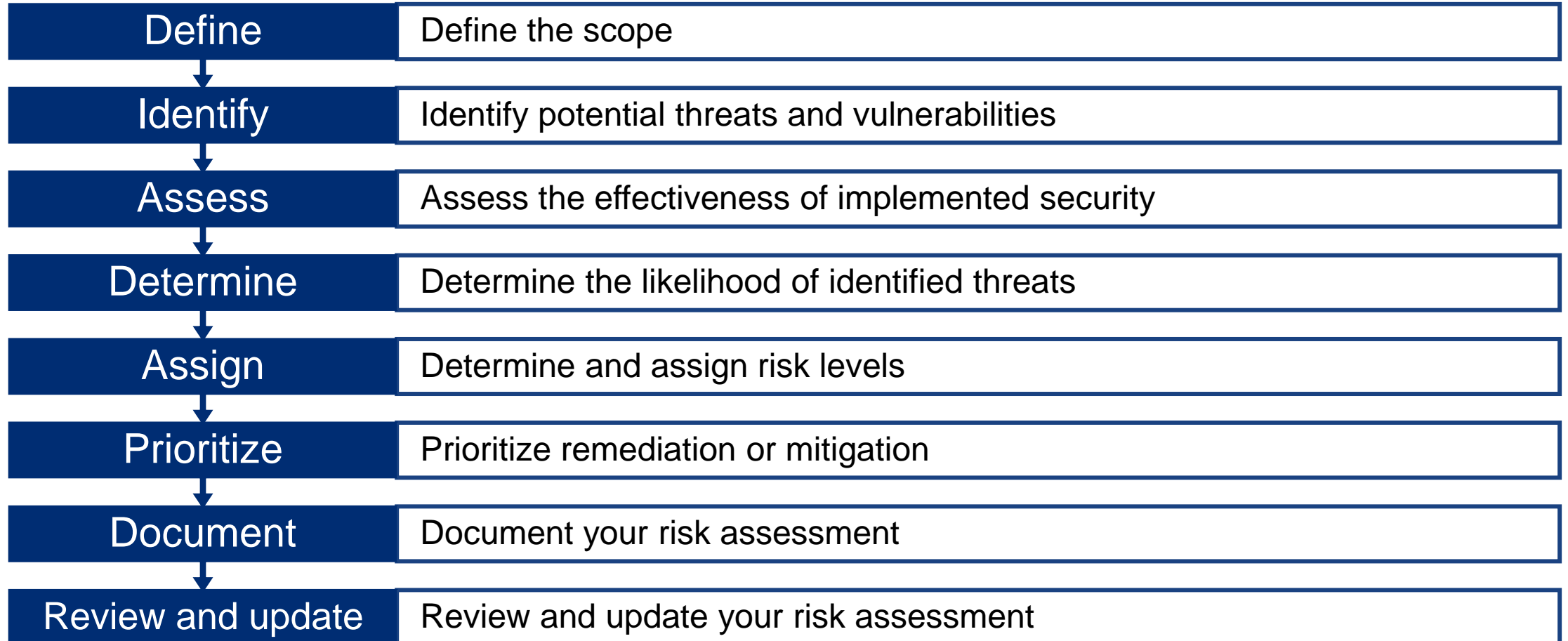


**Policies and Procedures**

# Common Steps and Creating an Action Plan

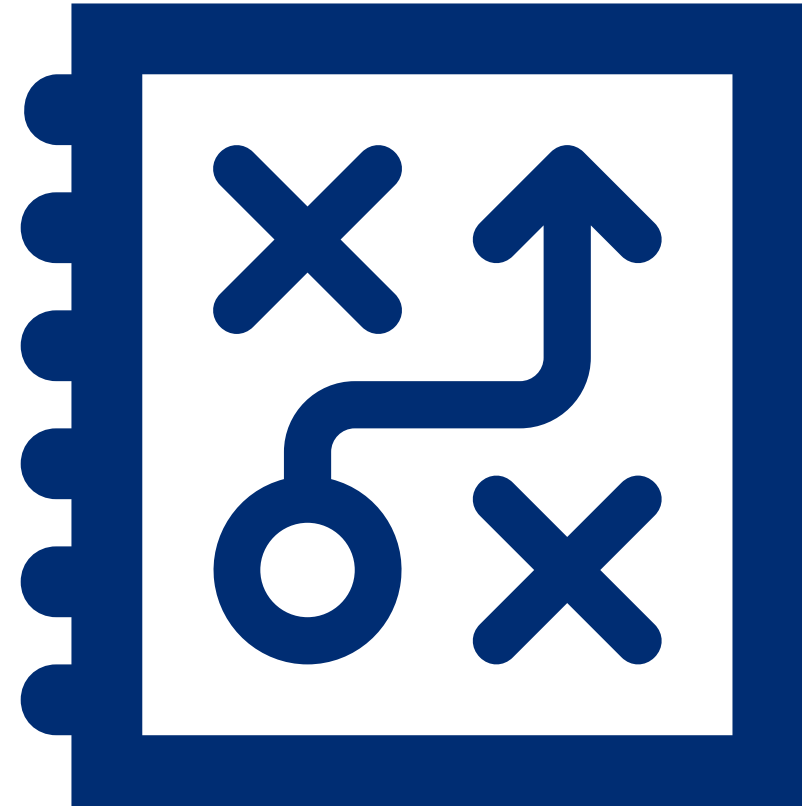
2021

# Common Steps



# Create an Action Plan

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# 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](#).

# Security Risk Assessment Tool Disclaimer

*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

2021

# Security Risk Analysis Specific 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 [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>



# Program Integrity



For post payment audit guidance,  
contact: [hitech@omig.ny.gov](mailto:hitech@omig.ny.gov)  
or review the materials available on our  
website

[https://www.health.ny.gov/health\\_care/medicaid/redesign/ehr/audit/](https://www.health.ny.gov/health_care/medicaid/redesign/ehr/audit/)

# Certified EHR Technology (CEHRT)

- Minimum requirement: 2015 Edition
- Visit <https://chpl.healthit.gov/> to obtain the CEHRT ID



# Program Resources



**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: 646-619-6400

# EHR Incentive Program Survey

 **Department of Health** | Office of Health Insurance Programs

**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

2021