



**Department
of Health**

**Office of
Health Insurance
Programs**

NY Medicaid EHR Incentive Program, A CMS Promoting Interoperability Program

Security Risk Analysis (SRA)

Q4 2018

Webinar Agenda

Meaningful Use Objective 1: Protect Patient Health Information

SRA Toolkit

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](#).

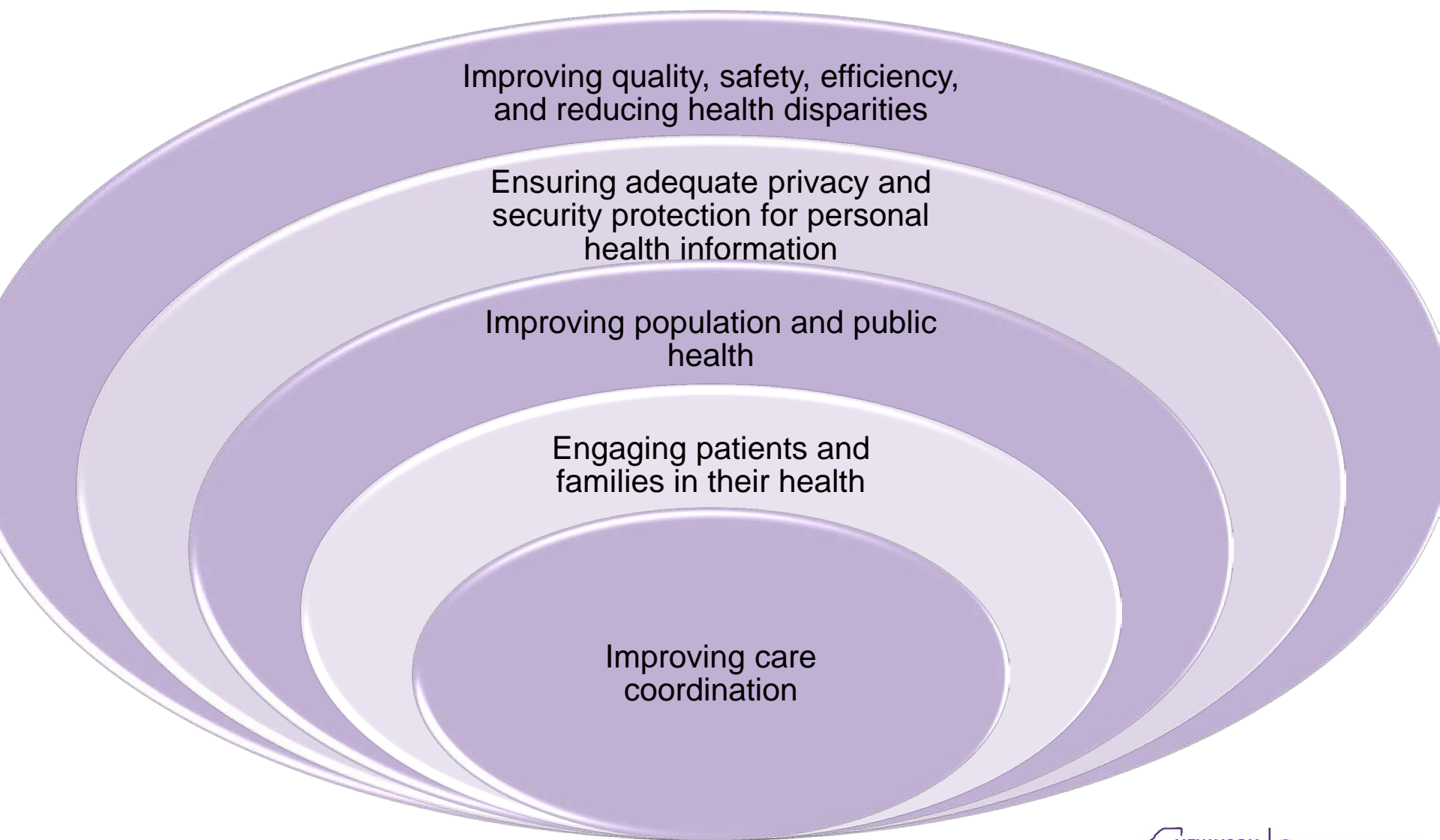
Meaningful Use Objective 1: Protect Patient Health Information

NY Medicaid EHR Incentive Program, a CMS Promoting Interoperability Program

Through the NY Medicaid EHR Incentive Program, Eligible Hospitals and Eligible Professionals in New York who adopt, implement, or upgrade to certified EHR technology, and subsequently become meaningful users of the EHR technology, can qualify for financial incentives.



CMS Promoting Interoperability policy priorities



How does this benefit you?



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 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?

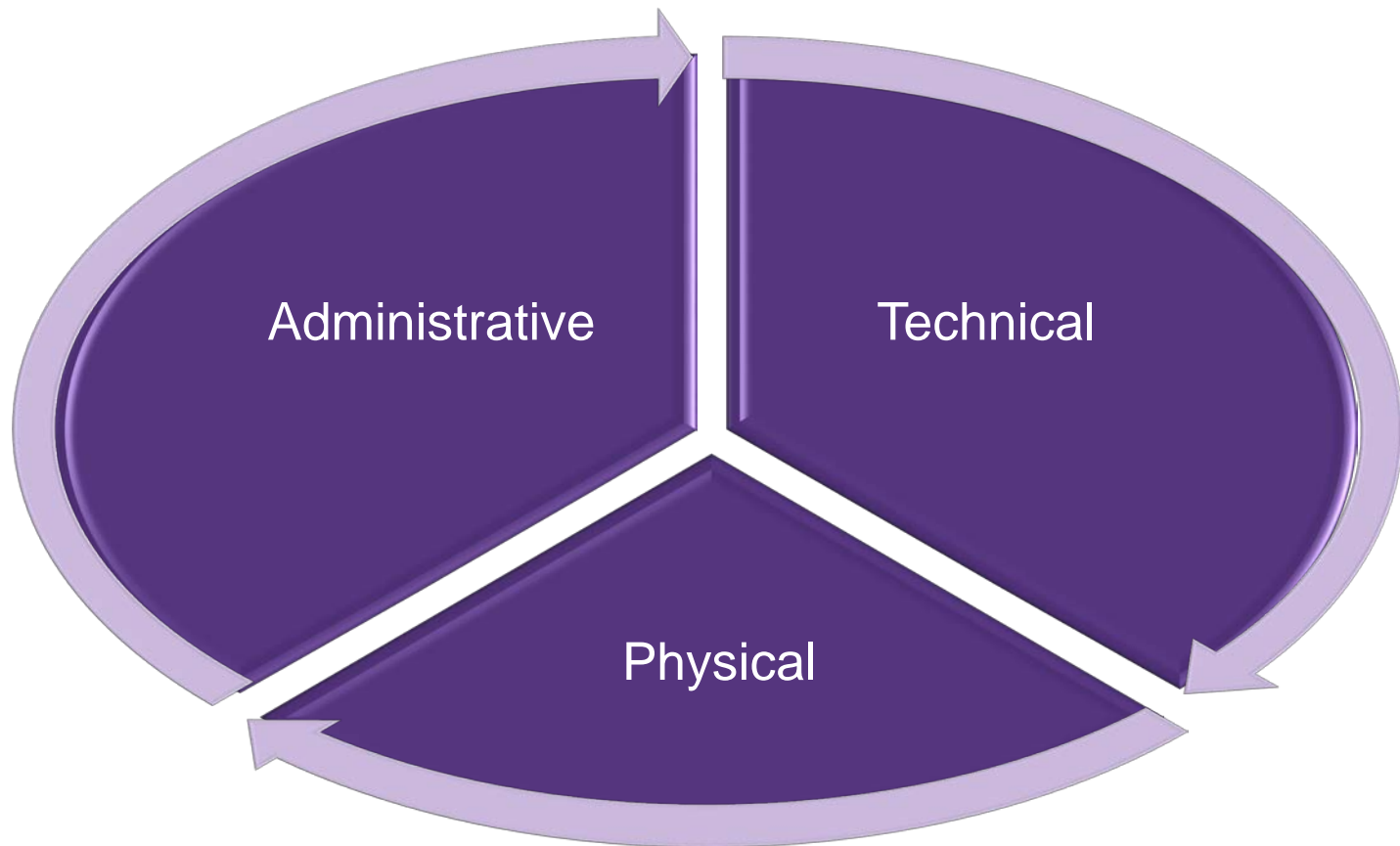
“The U.S. Department of Health & Human Services describes risk as a combination of factors or events:

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?”

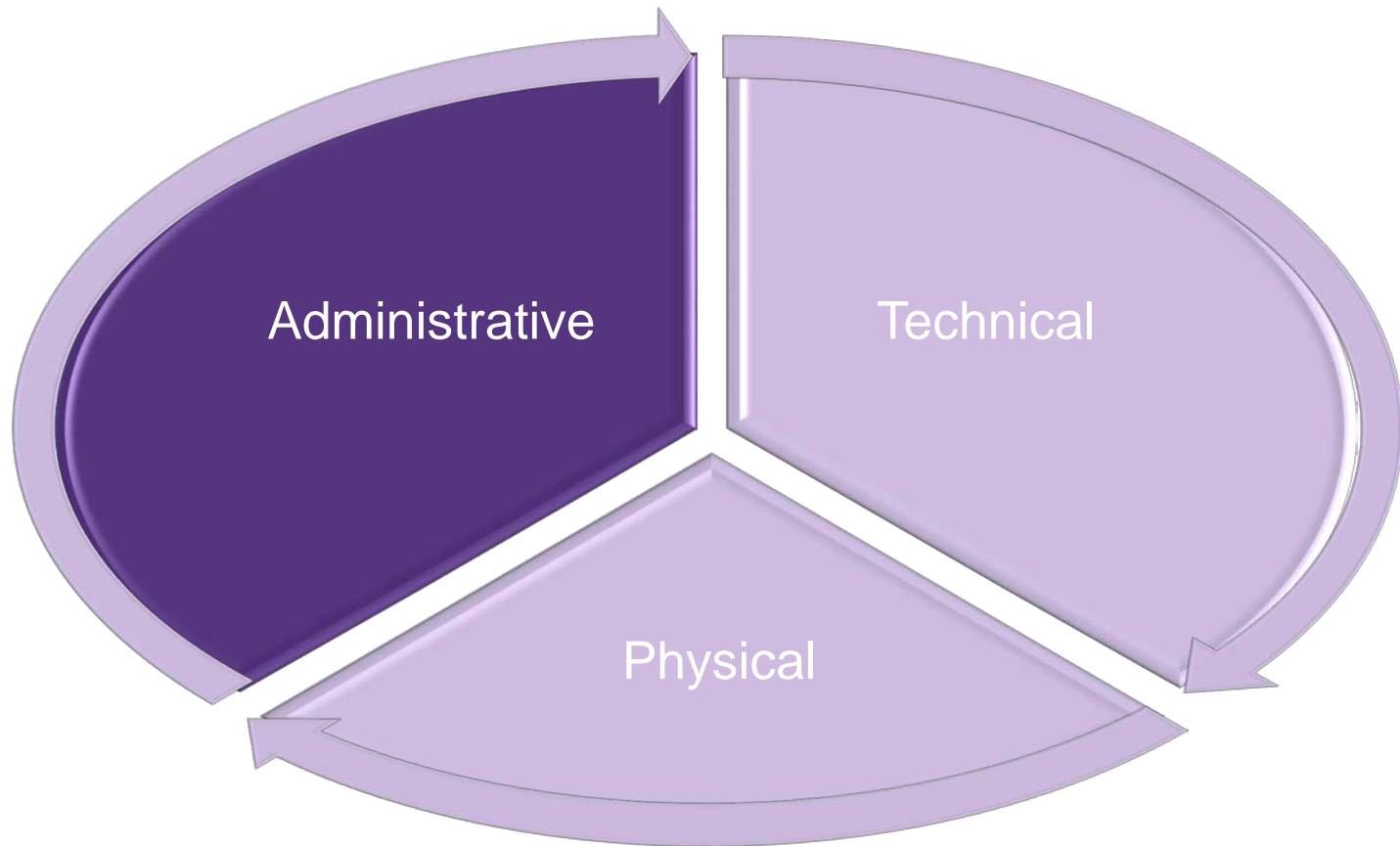
The SRA MUST be completed
Within the EHR reporting period calendar year
and
Prior to the Attestation Date

Security Areas to Consider

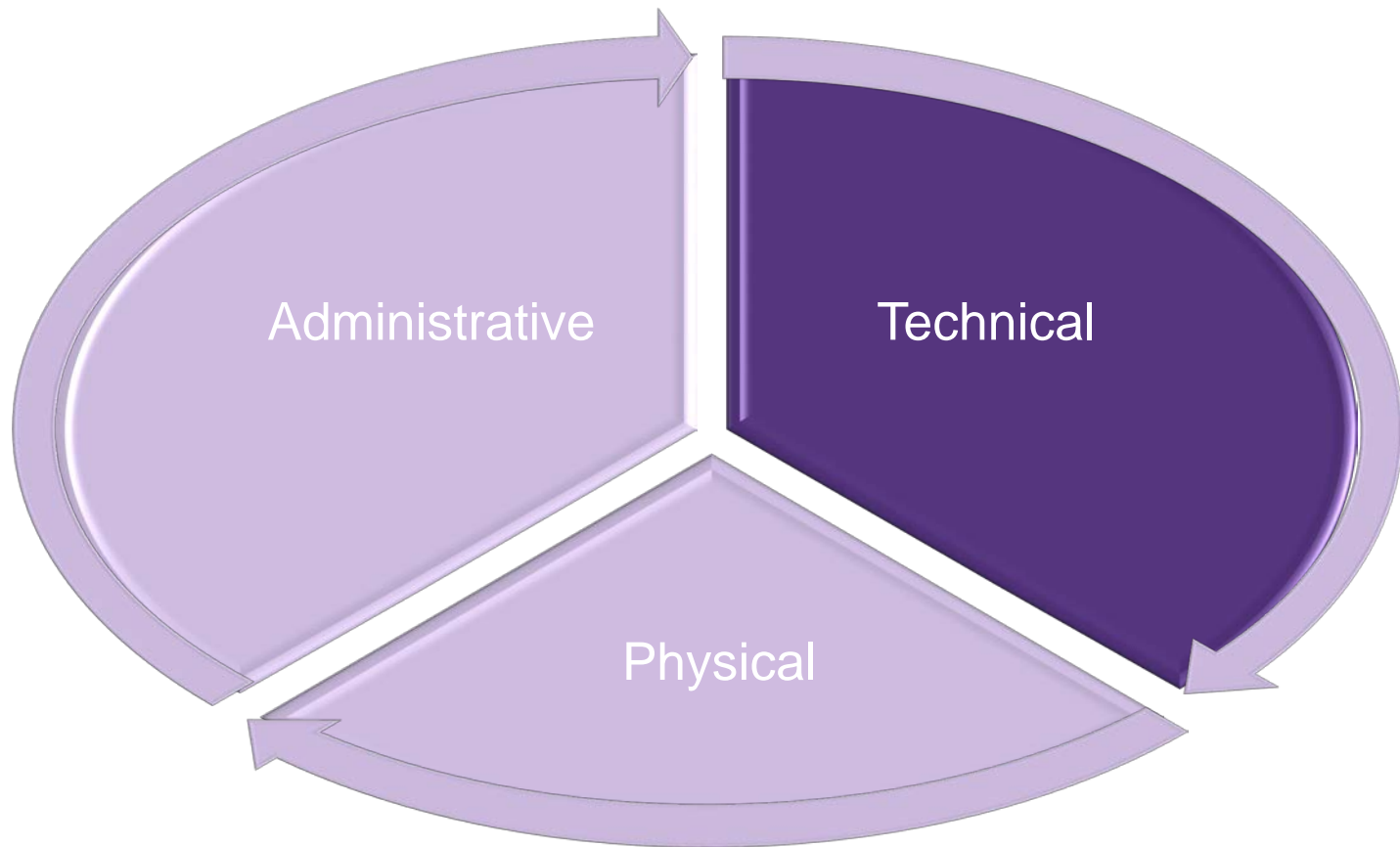
Security Areas



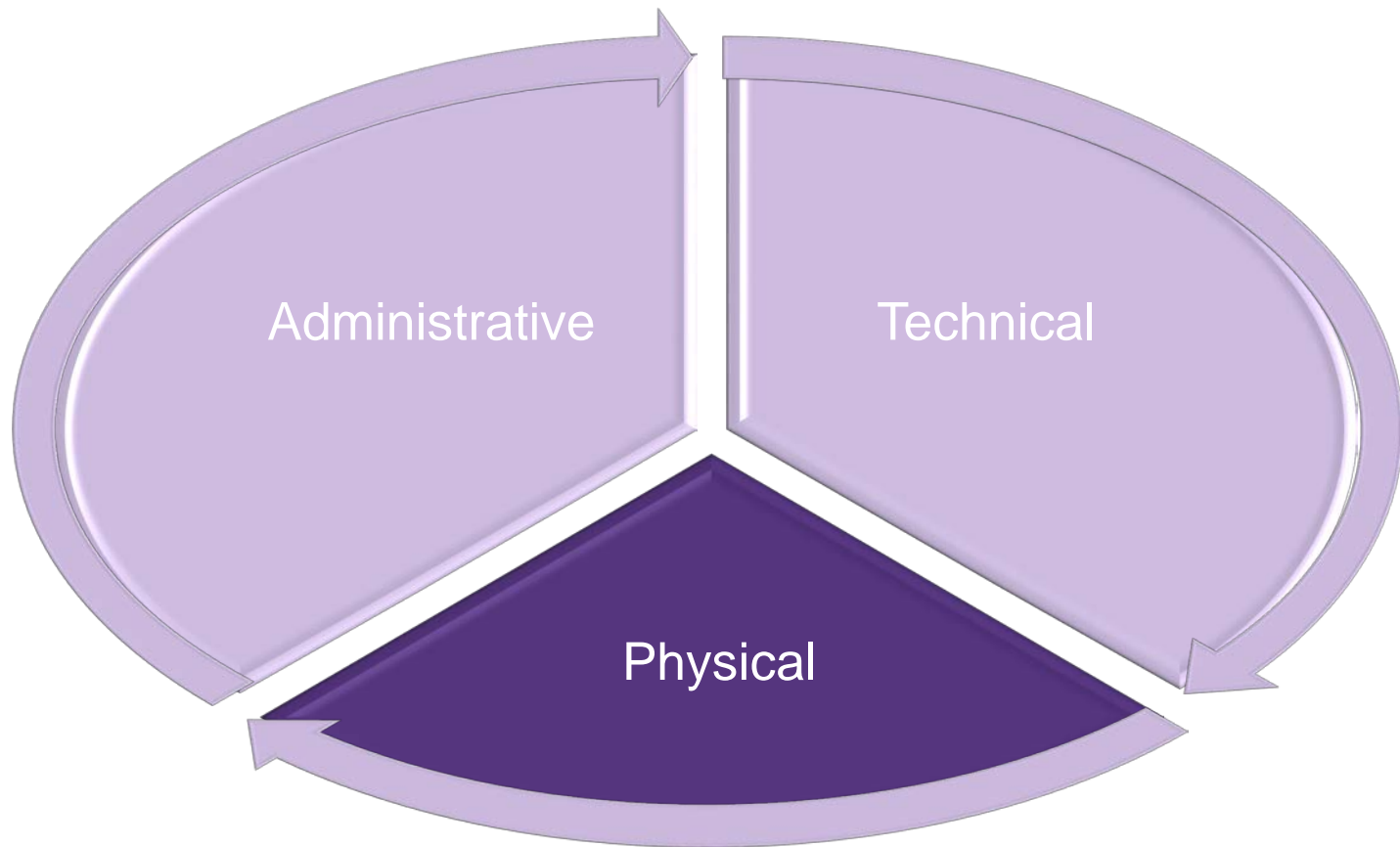
Security Areas - Administrative



Security Areas - Technical

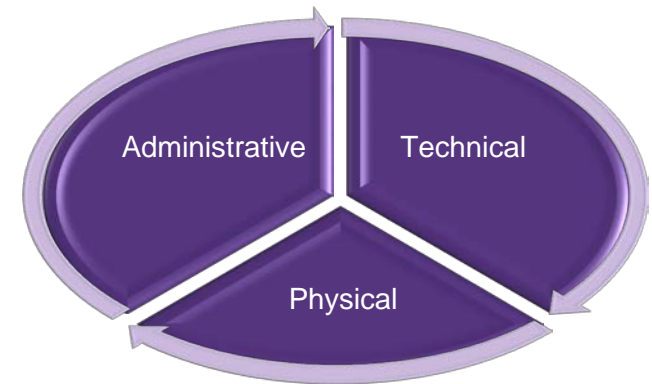


Security Areas - Physical



Additional Considerations

- Policies & Procedures
= written documentation
- Organizational Requirements
= agreements with business associates and vendors



Common Considerations and Creating an Action Plan

Common Considerations

Define the scope

Identify potential threats and vulnerabilities

Assess the effectiveness of implemented security

Determine the likelihood of particular threats

Determine and assign risk levels

Prioritize remediation or mitigation

Document your risk analysis

Review and update your risk analysis

Create an Action Plan

Program Integrity

Providers must retain all attestation supporting documentation for no less than six years after each payment year.

Examples:

- Any reports that support the conclusion that you have met the objectives or exclusions.
- A record to support the numerator and denominator values for the attested measures.

***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



The screenshot shows the HealthIT.gov website. The header includes the HealthIT.gov logo, the text "Official Website of The Office of the National Coordinator for Health Information Technology (ONC)", and social media icons for LinkedIn, Twitter, YouTube, and RSS. A navigation menu contains "TOPICS", "HOW DO I?", "BLOG", "NEWS", and "ABOUT ONC". A search bar is located on the right. The breadcrumb trail reads: "Home > Topics > Privacy, Security, and HIPAA > Security Risk Assessment".

Privacy, Security, and HIPAA +

- Educational Videos
- HIPAA Basics +
- Privacy & Security Resources & Tools
- Security Risk Assessment** -

Security Risk Assessment

The Health Insurance Portability and Accountability Act (HIPAA) Security Rule requires that [covered entities](#) and its business associates conduct a risk assessment of their healthcare organization. A risk assessment helps your organization ensure it is compliant with HIPAA's [administrative, physical, and technical safeguards](#). A risk assessment also helps reveal areas where your organization's protected health information (PHI) could be at risk. Watch the [Security Risk Analysis video](#) to learn more about the assessment process and how it benefits your organization or visit the [Office for Civil Rights' official guidance](#).

Read the [HHS Press Release](#).

Download the SRAT event files from the April 29 Webinar [ZIP - 4 MB]

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

Certified EHR Technology (CEHRT) Requirements

- Modified Stage 2
 - 2014 Edition CEHRT
 - 2015 Edition CEHRT
 - Combination of 2014 and 2015 CEHRT
- Stage 3
 - Immunization Reporting:
 - 2015 Edition CEHRT
 - All Other Measures:
 - 2015 Edition CEHRT
 - Combination of 2014 and 2015 CEHRT

*Effective 2019, **all** providers must use 2015 Edition CEHRT.*

Visit <https://chpl.healthit.gov/> to obtain CEHRT ID

Before you submit your Attestation!

Please make sure this information is up to date:

- ✓ [CMS Registration](#) – phone & email contacts
- ✓ Medicaid fee-for-service enrollment
- ✓ Payee affiliation

- NY EHR Incentive Program SRA Page and Tip Sheet
www.health.ny.gov/ehr
- CMS www.cms.gov
- OCR www.hhs.gov/ocr
- ONC 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>

Regional Extension Centers

New York City	NYC Regional Electronic Adoption Center for Health (NYC REACH) Website: www.nycreach.org Email: pcip@health.nyc.gov Phone: 347-396-4888
Outside of New York City	New York eHealth Collaborative (NYeC) Website: www.nyehealth.org Email: hapsinfo@nyehealth.org Phone: 646-619-6400

NY Medicaid EHR Incentive Program Support Teams

Phone: 1-877-646-5410

Option 1: ePACES, ETIN, MEIPASS Technical Issues, Enrollment

Email: meipasshelp@csra.com

Option 2: Calculations, Eligibility, Attestation Support and Review,
Attestation Status Updates, General Program Questions

Email: hit@health.ny.gov

Option 3: Public Health Reporting Objective Guidance, MURPH
Registration Support, Registry Reporting Status


Email: MUPublicHealthHelp@health.ny.gov

Website: <http://health.ny.gov/ehr>

Survey: https://www.surveymonkey.com/r/ny_ehr



Program Satisfaction 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?