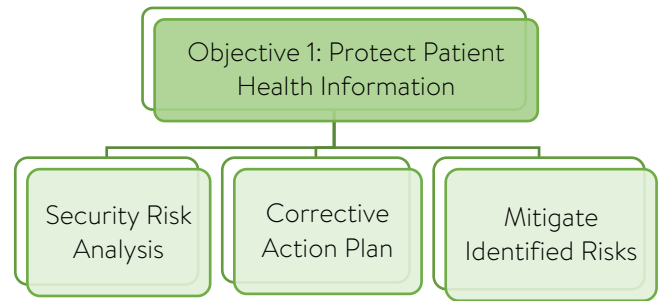


Staged for Success: Stage 3

Protect Patient Health Information



What is a Security Risk Analysis (SRA)?

A Security Risk Analysis (SRA) is a process to identify, assess, and mitigate risks associated with accessing, creating, transferring, and storing Electronic Protected Health Information (ePHI). To successfully meet the associated Stage 3 objective of the Medicaid Promoting Interoperability (PI) Program, the Eligible Professional (EP) must attest to conducting a security risk analysis to identify threats and vulnerabilities facing their operation that could lead to breaches of ePHI. Performing an SRA is the first step in protecting ePHI and is required to comply with PI as well as the Health Insurance Portability and Accountability Act (HIPAA).

Important Points to Consider

- An accurate and thorough security risk analysis must include all devices that contain, maintain, or transmit ePHI for the organization. This includes workstations, office equipment, medical devices, personal devices, portable devices, and more.
- The SRA must also include all software using ePHI, such as the EHR, Practice Management, Active Directory, Billing Platforms, Calendars/Scheduling, and more. *It's not just the EHR!*
- Risks identified in the SRA process must be addressed in a timely manner. At minimum, a plan to correct identified risks should be in place.
- Your SRA must be specific to your practice. Relying on your EHR vendor or hosting organization to “check the box” for Objective 1 puts you at risk of failing an audit.
- Each year of PI attestation must include a unique SRA during the year. This can be done outside of the reporting period and must occur following a new EHR system deployment.
- Failure to perform an accurate and thorough SRA and/or address identified risks are the most common reasons participants fail PI audits.
- Risks left unaddressed can result in security compromises and breaches, leading to patient harm, bad publicity, disruption to healthcare provision, and major financial costs.

Stage 3 Requires 2015 CEHRT!