HIPAA Requirements for Computer-based Patient Record Systems

and

the CPR Selection Toolkit

Caroline Samuels MD
csamuels@pol.net

Overview

- CPR Functional Requirements to Support HIPAA Implementation
  - Procedural
  - Technical
  - Implementation-Dependant
- CPRI-Host CPR Selection Toolkit
  - What is it?
  - Target Population – Users
  - Target Population - Vendors
  - How Does it Work?

CPR System Requirements for HIPAA

Procedural

- Most of the new HIPAA Requirements are largely Procedural
  - Appointment of Security Officer
  - Security Programs and Training
  - Consent and Authorization Requirements
  - Patient rights
  - Security procedures (audits, assessments, etc.)

CPR System Requirements for HIPAA

Technical:

- Encryption for messages sent "in the clear"
- Capability to limit functions/access by role
- Capability to attribute actions to an individual
- Capability to treat information at a granular level
- Capability to produce audit trails

CPR System Requirements for HIPAA

Implementation-dependent

- System Implementation vrs System Capability
  - Example - System may be **capable** of role-based access, but can be implemented such that all users can access all information. *This would result in non-compliance with HIPAA requirements*

CPR System Requirements for HIPAA

Implementation-dependent

- For currently installed products
  - Table modifications (codes, redefinitions)
  - Upgrades (encryption)
  - New access categories (patient)
  - Password functionality (expiration)
  - Customizations (warning screens)

CPR System Features for HIPAA Support

Patient Access to His/Her Record

System Requirement:

– Print-out of the record or

– Access to the electronic record

- Access to ONLY the patient's own record
- If remote access – secure access

CPR System Features for HIPAA Support

Patient-requested Amendment

System Requirements:

– System capable of capturing patient-submitted amendment if accepted

– System supports notification of persons who are know to have received previous information

– If denied, system captures request/denial

CPR System Features for HIPAA Support

Consents

System Requirements:

– System captures patient consent

– System captures revocation of consent

CPR System Features for HIPAA Support

Authorization (if supported by CPR)

System Requirements:

– System captures authorization

– System captures revocation, expiration of authorization, and can fire alert based on date

– System captures name, address of entity getting the released information

– System captures the description of the information released

10

CPR System Features for HIPAA Support

Authorizations (cont.)

- System captures a description of the information released
- System captures the purpose of the release
- System can produce a record of all disclosures for a given patient with all relevant information (enumerated above) covering preceding 6 years

CPR System Features for HIPAA Support

Minimum Necessary

[Not applicable for treatment purposes]

– Role-based access

– Database retains and reports information at a granular level

– Audits report individual access at a granular level

CPR System Features for HIPAA Support

Research

[Requirements largely procedural, IRB]

– Ability to de-identify information, remove:

Name

Address

All identification numbers

All dates except year

Etc [regulation contains a complete list]

– Ability to report de-identified aggregate data

CPR System Features for HIPAA Security Requirements
[final rule pending]

- Authorization controls
- Role-based access
- Emergency access
- Authentication control
- Password controls

- Audit controls
- Data integrity
- Workstation time-out Automatic back-up
- Virus Protection

14

CPR Selection Toolkit

Web-based Service

www.cpri-host.org

Database of Feature/Functions of a Computer-based Patient Record (CPR) system (over 350 items)

Vendor-submitted specifications

CPR Selection Toolkit

Target Population - Users

- Practicing Physicians, Solo and Group Practices
- Small Clinics

Target Vendors

- CPR Vendors with and without Practice Management partners
- Niche Vendors supporting medical practice
  - (Rx, Patient call-back, dictation, etc.)

CPR Selection Toolkit

Function

- User Selects Priority features, practice setting and price constraints

- Toolkit software lists CPR products meeting the specified criteria

- Search parameters modifiable to repeat search in order to adjust length of candidate list

- Complete feature/function list and contact information of candidate systems reported

Questions