HIPAA Requirements for Computer-based Patient Record Systems

and

the CPR Selection Toolkit

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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 known 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
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
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