



# AFMC and Security Risk Analysis

May 22, 2020

# Who is AFMC?

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- Founded in 1972 as a Professional Standards Review Organization
- 1983 – became Peer Review Organization (PRO)
- 2000 - AFMC awarded first contract in Mississippi
- 2002 - CMS Changed PRO to Quality Improvement Organization
- 2009 – AFMC named State Regional Extension Center
- 2014-2017 Subcontractor to TMF for Medicare QIO/QIN 11<sup>th</sup> Scope of Work and 12<sup>th</sup> Scope of work (Arkansas and Mississippi)
- 2017 – Subcontractor to TMF for QPP-SURS initiatives in Arkansas and Mississippi
- 2018 – Launched Security Risk Analysis as line of business in 6 states, including Mississippi

# Why AFMC

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- Designated Regional Extension Center for Arkansas
- SRA services incorporated into meaningful use technical assistance in 2011
- Expertise in HIPAA standards; privacy and security
- Performed more than 1600 SRAs in Arkansas, Mississippi, Missouri and Illinois
- Experience with private consulting services



# Security Risk Analysis

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The security risk analysis (SRA) is both a legal and regulatory requirement established by HIPAA and the HITECH Act, and is designed to ensure the privacy and security of patients' protected health information (PHI)

# Security Risk Analysis

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- The Security Risk Analysis (SRA) is essential to protect the confidentiality, integrity and availability of personal health information
- HIPAA regulations define the requirements for safeguarding personal health information (PHI) and the consequences for non-compliance
- Conducting (or reviewing) a security risk analysis is an annual requirement
- HIPAA audits are performed by the Office of Civil Rights (OCR)

# OCR/HHS Relaxes HIPAA Requirements

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- COVID-19 HHS Office for Civil Rights issued guidance to relax some HIPAA penalties for health care providers during the Nationwide Public Health Emergency.
- HHS has relaxed certain provisions to allow nonpublic facing communications with patients for telehealth services
  - Make good faith effort to continue following HIPAA security measures
  - Try to use apps that are HIPAA-compliant and do provide a business associate agreement (BAA)
  - If using apps that do not offer secure connections, providers should notify patients of potential privacy risks and document the patient was informed
  - Obtain patient consent for telemedicine visits – at a minimum, verbal is required
  - Document all new software, applications and devices used for telemedicine visits
- Remember to conduct your annual SRA

# Security Risk Analysis Services

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- Thorough review of administrative, physical and technical safeguards
- All SRA Tools based on HIPAA Standards
- Customized HIPAA Privacy and Security Policies and Procedures available
- Multiple service options
  - Basic: clinic Self-performs SRA using AFMC proprietary tools
  - Plus: Virtual Assessment – AFMC SRA Assessor performs physical and technical inspection virtually; Clinic performs annual audits and policy alignment using AFMC tools
  - Premier: On-site, in-person – AFMC will send an SRA Assessor to perform the inspection at your facility; Clinic performs annual audits and policy alignment using AFMC tools
    - Report findings and recommended corrective action
    - Risk Score provided
      - Guidance and education on record retention and documentation for audit purposes

# Clinic Benefit

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- Reduce clinical staff burden
- Experienced team deliver SRA services
- Guidance and education on best practices
- Tiered service options allow flexibility
- Budget-friendly services
- Virtual onsite assessment provides IT expertise to clinics
- Hands on, personalized assistance
- Free educational webinars and HIPAA eNewsletters
- Peace of mind





# Why AFMC

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- In-depth understanding of rural and underserved settings
- Technical infrastructure in place
- Affordable, customizable services
- Knowledgeable, experienced team
- No extra charge for personalized assistance



# Contact Information

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# Thank You