Unexpected Allies

IN THE TRENCHES WITH IT AND COMPLIANCE TO IMPROVE THE ELECTRONIC HEALTH RECORD

Agenda

- 1. Introductions
- 2. Benefits and Considerations of housing privacy within IT
- 3. Education and Communication
- 4. Risk Assessments
- 5. Case studies
- 6. Bringing it back to the HER
- 7. Questions

Legacy Health – Portland Oregon Metro Area

- 7 Hospitals (one is a children's hospital)
- Primary and Specialty care 50+
- 20 Urgent care Centers
- Laboratory Research Center
- Community Connect Epic Medical Record 35 clinics, 1 hospital, 1 birthing center

Legacy Health – Portland, Oregon Metro Area

Sandy Gilmore

Assigned to the Information Services Department 12 years as a compliance / privacy professional Clinical background – Physical Therapist

OHSU – Portland, Oregon Metro and Rural Oregon

- Academic medical center
 - 4500+ students
- Biomedical research institution
 - Primate Research Center
 - Gene Therapy Institute
- 2 hospitals (one children's hospital) with 3 campuses and satellite locations throughout the state
- OHSU Partners hosting medical record for 2 additional Oregon Health Systems

OHSU - Portland, Oregon Metro and Rural Oregon

Monica R. Freedle

Assigned to Information Privacy and Security

 $^{\circ}$ within the Information Technology Group

10+ years as a compliance / privacy professional

Clinical background – Qualified Mental Health Associate

Tech background -

- Retail tech support and systems integration
- Security and tech support for academic settings

Benefits and considerations

PROS AND CONS OF INTEGRATED SERVICES

Benefits

- Building a partnership
- Eventually, allows for a common language
- Better understanding of challenges
- Allows for compliance education to IT staff
 - And better tech education for privacy and compliance staff
- Enables proactive (by-design) approach
- Increased visibility of privacy to security and IT staff
- Puts an "outside" perspective on projects

Considerations

- Speaking a common language takes time and effort
- Compliance and privacy were historically not an IT priority
- Integration can slow down implementations
- Integration will impact IT workflows
- Inherent differences in the field
 - Resource allocation
 - Productivity tracking and related systems
 - Relationships with business partners
- Managing conflicts of interest

Communication

EDUCATING INTERNAL AND EXTERNAL STAFF ON THE VALUE OF INTEGRATED SERVICES

Customer Buy In - language

- •Clinical language
- •Compliance language
- •IT language
- •Electronic Health Record language

Customer Buy In - education

- IT and Privacy cross-training
- Internal training
 - Informatics and physicians
 - Greater exposure
- •Communication and understanding of impact
 - Workflows
 - Decisions and strategic planning

Risk Assessments

BUILDING A BETTER RISK MANAGEMENT PROCESS

Risk assessments

- •Assessments should be dynamic
 - More than Y/N
 - More than a form
- •Approach assessing risk as a group activity
- •Risk controls may overlap and leave residual risk
- •Risk response can be wide and varied

Risk Assessments - considerations

- •Small clinic
- Unique qualities
- •Multiple provider practice
- •Small hospital
- •Not employed / not owned equipment
- Contracted IT support

Work Plan

- •Based on risk assessment
- •Items that can be completed in given time frame
- •Types of issues for the work plan
- •Approval and reviews of work plan

Case Study: Substance Use Disorders

LOCALIZED/ IT SOLUTIONS

- Paper records
- •Fully confidential departments
- Partial compliance
- Nothing at all

INTEGRATED IMPLEMENTATION

- Automatic tracking of notices
- •Trackable accounting for generalized disclosures
- •The right access to the right records
- Appropriate partitioning
- Appropriate flags
- •Better communication channels

Case Study: Contingency Plans

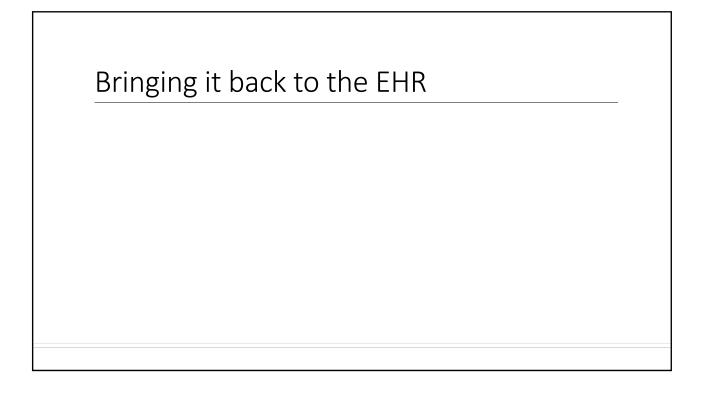
SHORT TERM ISSUES

Power outage

•Internet down

LONG TERM ISSUES

- •Serious weather / earth quake
- Malware
- •Hack / breach



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