



# **CMS Personal Health Record Pilot Project**

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# CMS PHR Pilot Project

- Available to Fee for Service beneficiaries in South Carolina.
  - Initial target population size = 100k.
  - All Fee for Service beneficiaries in SC are eligible = 660,000.
- Provides 24 months of Medicare A and B claims history upon request.
- Provides 24 months of TRICARE for Life pharmacy data upon request.
- Available 24 hours a day, 7 days a week through the internet.
- Project team.
  - QSSI – Prime Contractor.
  - HealthTrio – PHR Provider.
  - Palmetto GBA – Data Provider.
- Launched 4/7/08.

*Your Health. Your Record. Online, Anytime.*

# Pilot Project – Requirements

- Use an existing PHR.
- Claims data is pre-populated into the record.
- ICD 9 Coding data is translated into easy to understand language.
- Beneficiaries have the ability to add information, but not change their data.
- Meets CMS security standards.
- Implement a comprehensive Outreach Plan.

# Privacy/Security Protections

CMS SECURITY REQUIREMENT	MyPHRSC POLICY/ACTION
Information shall be protected from unauthorized access, disclosure, duplication, modification using risk based and business driven security safeguards.	<ul style="list-style-type: none"> <li>• Physical and environmental protection controls are in place</li> <li>• Production Input/Output Controls</li> </ul>
Multi-layered security structure.	<ul style="list-style-type: none"> <li>• The system uses a layered approach consisting of the Presentation, Application and Data Zones.</li> <li>• End users access is through a SSL protected secure web communication using an Internet Browser.</li> <li>• The data zone is geographically separated from the application zone</li> <li>• Transmission of data occurs via a VPN.</li> </ul>
Information access shall be limited based on a least-privilege approach and a need-to-know basis	<ul style="list-style-type: none"> <li>• Personnel Security Controls are in place</li> </ul>
CMS Policy for the Information Security Program. This policy aims to reduce the risk, and minimize the effect of security incidents.	<ul style="list-style-type: none"> <li>• Physical and environmental protection controls are in place</li> </ul>

# Privacy Protections

CMS SECURITY REQUIREMENT	MyPHRSC POLICY/ACTION
CMS Information Security Acceptable Risk Safeguards (ARS) minimum thresholds for information security controls	<ul style="list-style-type: none"> <li>• MyPHRSC is FISMA compliant</li> <li>• MyPHRSC complies with NSIT Standards NIS SP 800-53 and NISP SP 800-63, Electronic Authentication Guidelines.</li> </ul>
CMS Information Security (IS) Risk Assessment (RA) Methodology.	<ul style="list-style-type: none"> <li>• Comprehensive RA</li> <li>• Updated annually</li> <li>• HIPAA Incident Response and Reporting System to report, mitigate, and document HIPAA security incidents and violations.</li> </ul>
CMS System Security Plan Methodology.	<ul style="list-style-type: none"> <li>• Comprehensive SSP</li> <li>• Updated and approved annually</li> </ul>
CMS Information Security Contingency Planning. IT contingency planning refers to a coordinated strategy involving plans, procedures, and technical measures that enable the recovery of IT systems, operations, and data after a disruption.	<ul style="list-style-type: none"> <li>• Contingency planning and disaster recovery controls are documented in the MyPHRSC Contingency Plan.</li> <li>• Tested Annually</li> <li>• Table top test with After Action Report</li> </ul>
CMS Security Test & Evaluation Reporting Standard: Must be used when documenting the results of Information Security testing.	<ul style="list-style-type: none"> <li>• Full ST&amp;E prior to launch</li> <li>• Updated ST&amp;E in February, 2009 &amp; June, 2009</li> </ul>

# SNOMED – As a Means to Ensure Privacy

- SNOMED coding provides a mechanism to tie together data that is otherwise unrelated.
- SNOMED (e.g., tying unrelated data together) allows for the creation of Sensitive Data Categories.
- The PHR default setting hides restricted data classes and restricted functional areas.
  - Many non-clinical people do not know what information in their PHR is related to conditions they would like to keep private. Suppressing the data provides a much higher level of privacy for the beneficiary.
  - Users can allow trusted members of their health care team, family or people they trust to have access to their Personal Health Record (e.g., Authorized Representatives).

# Protected Data Classes

All data classes are automatically restricted

Protected Data Classes			
These are special categories of data that require patient permissions to access			
Grant	Revoke	Action	Description
<input type="radio"/>	<input checked="" type="radio"/>	Sexual Assault	On-line access data related to Sexual Assault
<input type="radio"/>	<input checked="" type="radio"/>	Drug Abuse	On-line access data related to Drug Abuse
<input type="radio"/>	<input checked="" type="radio"/>	Abuse or Neglect	On-line access data related to Abuse or Neglect
<input type="radio"/>	<input checked="" type="radio"/>	Sexually Transmitted Diseases	On-line access data related to Sexually Transmitted Diseases
<input type="radio"/>	<input checked="" type="radio"/>	Mental Health	On-line access to data related to psychological behavior
<input type="radio"/>	<input checked="" type="radio"/>	Contraceptive Issues	On-line access data related to Contraceptive Issues
<input type="radio"/>	<input checked="" type="radio"/>	Aids	On-line access data related to Aids
<input type="radio"/>	<input checked="" type="radio"/>	Alcohol Abuse	On-line access data related to Alcohol Abuse
<input type="radio"/>	<input checked="" type="radio"/>	Reproductive Health	On-line access data related to Reproductive Health
<input type="radio"/>	<input checked="" type="radio"/>	HIV	On-line access data related to HIV
<input type="radio"/>	<input checked="" type="radio"/>	Genetic Testing	On-line access data related to genetic testing
<input checked="" type="radio"/>	<input type="radio"/>	Abortion	On-line access data related to Abortion

# Protected Functional Areas

Circled functional areas are automatically restricted

Functional Areas			
Grant	Revoke	Data Group	Description
<input checked="" type="radio"/>	<input type="radio"/>	Referrals & Authorizations	Referrals & Authorizations
<input type="radio"/>	<input checked="" type="radio"/>	Permissions	Permissions
<input checked="" type="radio"/>	<input type="radio"/>	Continuity Of Care Record	Access to your on-line Continuity Of Care Record
<input type="radio"/>	<input checked="" type="radio"/>	My Plan For Health	Access to your on-line My Plan For Health
<input type="radio"/>	<input checked="" type="radio"/>	Claims	Claims
<input type="radio"/>	<input checked="" type="radio"/>	Social History	Access to your on-line Social History information
<input checked="" type="radio"/>	<input type="radio"/>	Family History	Access to your on-line Family History information
<input type="radio"/>	<input checked="" type="radio"/>	Illness and Conditions	Access to your on-line Illness and Conditions
<input checked="" type="radio"/>	<input type="radio"/>	Medical History	Access to your on-line Medical History
<input checked="" type="radio"/>	<input type="radio"/>	Health Calendar	Access to your on-line Health Calendar
<input checked="" type="radio"/>	<input type="radio"/>	Visit Summary	Access to your on-line Visit Summary
<input checked="" type="radio"/>	<input type="radio"/>	Benefits & Eligibility	Benefits & Eligibility
<input checked="" type="radio"/>	<input type="radio"/>	Medication Profile	Access your on-line Medication Profile
<input checked="" type="radio"/>	<input type="radio"/>	Health Event Record	Access to your on-line Health Event Record
		<input type="button" value="Save"/>	<input type="button" value="Cancel"/>

# Health Record Summary

[Print CCR](#)
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## Continuity of Care Record

<b>CCR ID:</b>	e987ce5174a7427baa6047d93aa80e55	<b>Patient:</b>	Jane Doe
<b>Date/Time Created:</b>	21 Nov 2008 01:06 PM	<b>Language:</b>	English
<b>Created by:</b>	Jane Doe	<b>Version:</b>	V1.0
<b>Purpose:</b>	Transfer of Medical Data		

## Patient Demographics

Name	Date of Birth	Gender	ID	Address	Phone	Email
Jane Doe		Female		PO BOX 1234 COLUMBIA, SC 29290-0272		questions@myphrsc.com

## Payers/Insurance

Insurance	Insurance Type	Coverage Type	Group ID	Member ID	Source
<a href="#">Medicare</a>	Health Insurance	Medicare	CMSPHR		<a href="#">Medicare</a>

## Advance Directives

Description	Status	Last Verified	Contact	Source
Living Will	Current and Verified	19 Nov 2008	<a href="#">Bill Doe</a> <a href="#">John Doe</a>	<a href="#">Jane Doe</a>
Durable Power Of Attorney	Current and Verified	19 Nov 2008	<a href="#">Bill Doe</a>	<a href="#">Jane Doe</a>

# Summary

- CMS Security & Privacy requirements were planned into the project.
  - Takes time to implement.
  - Annual review is necessary.
- Partner collaboration is important to ensure Security and Privacy requirements are met.
- 508 Compliance is important.
  - PHR configured to meet 508 standards.
- Clearly written Security & Privacy standards build confidence in the system.
  - Online agreement is written in plain English.
  - Outreach messaging is consistent.

# Questions?



1-888-MyPHRSC (697-4772)  
<https://www.myphrsc.com>

