

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

- 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
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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	INTEGRATED IMPLEMENTATION
<ul style="list-style-type: none"> •Paper records •Fully confidential departments •Partial compliance •Nothing at all 	<ul style="list-style-type: none"> •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	LONG TERM ISSUES
<ul style="list-style-type: none"> •Power outage •Internet down 	<ul style="list-style-type: none"> •Serious weather / earth quake •Malware •Hack / breach

Bringing it back to the EHR

Questions?

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