

Minnesota Privacy and Security Project

Variations Working Group

Wednesday August 23, 2006

To complete scenario #6, we need to briefly discuss the last portion of this scenario concerning the collection and use of patient data to monitor the incidence and management of diabetic patients.

Scenario #6

The RHIO in your region wants to access patient identifiable data from all participating organizations (and their patients) to monitor the incidence and management of diabetic patients. The RHIO also intends to monitor participating providers to rank them for the provision of preventive services to their diabetic patients.

- o Do you have any concerns about providing a third party patient data to monitor the incidence and management of diabetic patients?
- o Do you have any concerns with supplying patient data for provider rankings?

To complete our discussion of the of health information exchange issues, we will discuss the questions and topics in the following outline:

- A. Discuss the types of initial data that could be exchanged in a HIE that would be most beneficial to providers and would create less of a privacy concern than providing access to a patient's complete EHR.
 - 1. What limited sets of data would be most useful? (e.g., medication history, discharge reports, laboratory data, etc.)
 - 2. What are the most common types of data exchanged with other providers?
 - 3. Do any of the exchanges in Question 2 occur electronically today?
- B. Domains having significant impact on a health information exchange
 - 1. User and Entity Authentication (Domain 1)
 - a. What are the difficulties in authenticating other providers and organizations to access your systems?
 - b. What would you require for a third party to maintain an accurate list of providers credentialed to access your data or systems?
 - 2. Authorization and Access Control (Domain 2)
 - a. What would be your concerns with operationally satisfying Minnesota's patient consent laws?
 - b. Would you offer a "Break the Glass" feature to external providers? If so, what problems does this create?

3. Patient and Provider Identification (Domain 3)
 - a. Are there any problems in getting incoming patient data to the correct physician? What problems would you anticipate if this process were electronic?
 - b. Any concerns with identifying patients across different organizations EHRs?
 - c. Any concern with identifying providers associated with incoming health records?

4. Information Auditing and Monitoring (Domain 6)
 - a. What data elements do you log when someone in your organization uses the “Break the Glass” feature?
 - b. What is the reaction from your medical staff that are forced to use the “Break the Glass” feature? How does this impact your business processes?
 - c. If you offered this featured to external providers what additional logging and auditing would this require?
 - d. What would be the ideal functionality of an audit tool?

5. Information Use and Disclosure (Domain 9)
 - a. What liability concerns would you have for inappropriate disclosures or data security breaches?
 - b. Are you concerned with state’s regulations of notification of patients potentially compromised by a web site breach or security loss?