

The Stage 1 Meaningful Use Requirement for Privacy and Security References HIPAA Security

(Exact language from the HIPAA Security Regulation Shown Below)

| Stage 1 Meaningful Use | | §164.308(a)(1) Security Management Process. Implement policies and procedures to prevent, detect, contain, and correct security violations | |
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| Objective | Measure | Risk analysis | Risk management |
| Protect electronic health information created or maintained by the certified EHR technology through the implementation of appropriate technical capabilities. | Conduct or review a security risk analysis per 45 CFR 164.308 (a)(1) and implement security updates as necessary and correct identified security deficiencies as part of its risk management process | Conduct an accurate and thorough assessment of the potential risks and vulnerabilities to the confidentiality, integrity, and availability of electronic protected health information. | Implement security measures sufficient to reduce risks and vulnerabilities to a reasonable and appropriate level to comply with §164.306(a) |

References and Policy and Procedure requirement:

- 1) §164.306(a) – Security standards: General Rules
 - (a) General requirements. Covered entities must do the following:
 - (1) Ensure the confidentiality, integrity, and availability of all electronic protected health information the covered entity creates, receives, maintains, or transmits.
 - (2) Protect against any reasonably anticipated threats or hazards to the security or integrity of such information.
 - (3) Protect against any reasonably anticipated uses or disclosures of such information that are not permitted or required under subpart E of this part.
 - (4) Ensure compliance with this subpart by its workforce.
- 2) §164.316 Policies and procedures and documentation requirements.

A covered entity must, in accordance with §164.306:

 - (a) Standard: Policies and procedures. Implement reasonable and appropriate policies and procedures to comply with the standards, implementation specifications . . .
 - (b)(1) Standard: Documentation.
 - (i) Maintain the policies and procedures implemented to comply with this subpart in written (which may be electronic) form; and
 - (ii) If an action, activity or assessment is required by this subpart to be documented, maintain a written (which may be electronic) record of the action, activity, or assessment.

Context of §164.308 (applies to all implementation specifications)