



MACRA and the Security Risk Assessment

Are you overlooking the Medicare Access and CHIP Reauthorization Act's (MACRA) Security Risk Assessment requirement?

While providers are focusing on the data reporting requirements and mechanisms of the Medicare Access and CHIP Reauthorization Act's Quality Payment Programs, they may be overlooking an important MACRA eligibility requirement – the Security Risk Assessment (SRA).

Not only is the Security Risk Assessment a HIPAA requirement, it is required for providers who choose to document their efforts to provide higher quality care, lower cost, and improve patient outcomes through the Merit-based Incentive Payment System (MIPS). If this requirement for eligibility is ignored, a provider's efforts may be futile.

To receive any score in the base score required measures Advance Care Information performance category, physicians and other clinicians must be able to report "yes" to the *Protect Patient Health Information Objective, Security Risk Analysis Measure*. Reporting "yes" is not just a matter of conducting the SRA, but also mitigating any findings, and documenting the efforts. This requirement underscores the importance the Department of Health and Human Services/Centers for Medicare and Medicaid continues to place on protecting patient privacy and the security of patient electronic information.

Some basic points to consider when assessing the security of your patient information:

- Know where your patient electronic PHI (ePHI) is located – and it's not just in your EHR. Think of scanned files (EOB's, test results), emails, Word, or Excel documents with ePHI on laptops or other devices.
- Encrypt your ePHI to assure your practice is taking appropriate steps to safeguard patient data.
- Make sure your HIPAA Security Policies include a breach response plan.
- Create or update employee policies to make sure the concept of "minimum necessary" is applied to each job in your practice.
- Provide Security and Privacy training to employees and providers and document the training.

To assist providers in the Security Risk Assessment process, The Office for Civil Rights (OCR) and the Office of the National Coordinator (ONC) provides a HIPAA Security Risk Assessment (SRA) Tool at: [SRA Tool \[.exe - 91.3 MB\]](#)

The Brown Edwards Medical Practice Services Team is here to help! Give us a call to see how we can support your practice with management, review, planning, and compliance assistance tailored to the specific needs of your practice! You can reach members of the Brown Edwards Medical Practice Services team at (276) 466-5248 or (304) 325-8157.

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