

ASPA Empowered Healthcare Services – Security Risk Assessment:

Providers Take Note: With **MIPS** now encompassing predecessor programs PQRS and Meaningful Use, as well as new programs for Practice Improvement and Cost/Resource management, **more and more of your Medicare Payments are based on performance against these MIPS measures.** Of particular note in MIPS is that Meaningful Use, now called Advancing Care Initiatives, has a set of Base Score measures that dramatically changes your MIPS scoring for meeting the requirements. If even one of the Base Score Measures is skipped, the entire Advancing Care Initiatives score is scored at 0. **The Security Risk Assessment is one of these Base Score Measures.** This means that all 25 points associated with the MIPS Composite Performance Score (Max=100) will be wiped out. This will have an **immediate and material negative effect on your Medicare payments.**

The HIPAA Security rule requires a “thorough and accurate assessment of the risks and vulnerabilities of the entity”. Note this is not simply your EHR but rather “the entity”. Your practice must assess and provide safeguards wherever electronic protected information is used, handled or stored. This includes physical, administrative and technical safeguards. You must:

- Assess your entity for any risks or vulnerabilities as identified
- Address any risks or vulnerabilities within your entity
- Create and actively manage and administer a Security Plan that addresses the safeguards
- Actively and regularly review the Security Plan for compliance and to address any changes

Please Note: Your EHR vendor representations are not sufficient to meet this requirement.

While it is true that a simple attestation is all that is required for the practice to “check the box” in MIPS reporting. However, it is important to note that Medicare has identified, through audits under Meaningful Use, that the Security Risk Assessment is often not accomplished correctly (or at all) and **practices are failing their audit.** Accordingly this is a focus of most recent Meaningful Use audits and will be part of most MIPS audits as well. The payment consequence under MIPS is much more dramatic than under Meaningful Use. Further, audit and HIPAA penalties for violations are quite large.

Simply put, while the attestation is simple, it must be based on an appropriately completed Security Risk Assessment and subsequent reviews each and every year. The consequences of not completing it are simply too large a financial risk.

ASPA Empowered Healthcare Services has the skills and resources to help you complete a Security Risk Assessment that meet MIPS requirements. It is imperative that you act on the findings and maintain compliance as developed in the assessment and documented in the Security Plan. However, by following our compliant process, you can achieve a compliant entity status under the HIPAA Security Rule. Whether you use ASPA Empowered Healthcare Services for all of your MIPS requirements or simply choose to leverage our skilled resources for the Security Risk Assessment you will benefit from working with ASPA.

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