



Good Health Network

Presentation to

AHIC

CPS workgroup

Friday, June 22, 2007



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Trusted Solutions for Health Information™



Presentation Summary

Introduction to Good Health Network (GHN)

Core Competencies

- Security Services
- Identity Proofing
- The Good Health Management Journal, our Personal Health Record (PHR)

Security and Privacy Compliance

Projected Impact

Discussion and Questions



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GHN Introduction

Good Health Network is a healthcare technology company delivering personal health management systems with a secure patient-centric approach.

- GHN is a privately owned healthcare technology company
 - Founded in April 2000
 - Located in Maitland, Florida

We provide Trusted Solutions for Health Information™ to raise the bar on PHR quality and security in the US marketplace.

- GHN Trusted Network enables the secure sharing of health information among patients, providers and payers
- Engaged in leadership of national standards and security requirements for PHR
- Expertise in extracting and integrating healthcare data
- Highly experienced in credentialing, authenticating and auditing end users
- PKI-enabled PHR solution that empowers consumers





GHN Core Competency

GHN Products

- **Digital Identity Management and Security Services**

- Identity Proofing for all GHN Network users
- Digital authentication
- Digital signature

- **GHN Personal Health Record (PHR)**

- **Good Health Management Journal (GHMJ)**

- Advanced security, user authentication with roles-based access
- Web-based, secure PKI access
- Import/export functionality
- Patient owns and controls access to the data
- HIPAA compliant
- Reminder messages
- Secure messaging between patient and care provider
- Integrated wellness & management tools and information
- Interoperability with EHR/EMR with CCR
- Patient consents, authorizations and advanced directives
- Full Transparent Real-time Audit Trail



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GHN Differentiators

Significant company experience in Identity Proofing

- Expertise in credentialing, authenticating and auditing end users

GHN Milestone

GHN managed the infrastructure for one of the first state Medicaid programs to share prescription data with physicians.

- ❖ Credentialed, enrolled and trained over 1500 physicians in Florida
- ❖ Use of medication history data allowed for the identification and reporting of fraud and abuse situations
- ❖ Populated PDA devices in real-time with patient medication and allergy data
- ❖ A ROI of 2.7 times was identified by the program sponsors
- ❖ Beta implementation of e-prescribing services





CPS Working Hypothesis



All persons and entities excluding consumers that participate in an electronic health information exchange network at a local, state, regional or nationwide level, through which individually identifiable electronic health information is stored, compiled, transmitted, or accessed, should be required to meet privacy and security criteria at least equivalent to relevant Health Insurance Portability and Accountability Act (HIPAA) Privacy and Security Rule requirements.





GHN Standards

- GHN is not a Covered Entity by definition
- GHN voluntarily is HIPAA compliant (45 CFR Parts 160 and 164)
- GHN meets or exceeds all the HIPAA Privacy Rules
- GHN exceeds the HIPAA Security Requirements
- GHN actively participates in developing the national healthcare informatics standards





HIPAA Rules Reviewed



Privacy

- Consumer Amendments (§164.526)
- Right to Restrict & Access (§164.522, §164.524)
- BAA (§164.308, §164.314)
- Consumer Mitigation (§164.530)
- Disclosure and Auditing (§164.528)
- HIPAA Training (§164.530)
- Limiting Data & Research (§164.514)
- Opt-in Marketing (§164.508)
- Privacy Policies (§164.316)
- Privacy Statement (§164.520)
- Consents and Authorizations (§164.506, §164.508, §164.510)
- User/Entity Directories (§164.510)

Security

- Security Management Process (§164.308)
- Assigned Security Responsibility (§164.308)
- Workforce Security (§164.308)
- Information Access Management (§164.308)
- Security Awareness and Training (§164.308)
- BAA (§164.308, §164.314)
- Facility Access Control (§164.310)
- Access and Audit Controls (§164.312)
- Transmission Security (§164.312)
- Documentation, Policies and Procedures (§164.316)





General Categories of HIPAA Security and Privacy Regulations

- Appropriate and reasonable safeguards
- Mapping PHI data flow
- Protecting appropriate data
- Access control
- Third party agreements
- Accountability
- Training and awareness





General Requirements of HIPAA Security and Privacy Regulations

HIPAA Direction	Security and/ or Privacy Rule Requirement	GHN Solutions
Appropriate and reasonable safeguards	<u>Security and Privacy</u> - appropriate and reasonable measures to safeguard protected health information (PHI)	-Secure SAS-70 Hosted Facilities -Help Desk Security Questions -GHN Privacy Statement -PKI-enabled Trusted Network
Mapping PHI data flow	<u>Security and Privacy</u> - understand and map PHI data flow	-GHMJ and Help Desk Documentation -GHMJ ERD
Protecting appropriate data	<u>Privacy</u> - Legal Health Record (LHR) must be appropriately protected by policies, procedures, and security technology	-GHN Security Policies and Procedures -Roles-based Access -PKI-enabled Application
Access control	<u>Security</u> - must use at least one of four types of access control (user based, context based, role-based, or encryption) to limit access to PHI; <u>Privacy</u> - role-based access control is required -	-Roles-based Access -PKI-enabled Application -ICE technology -Realtime Transparent Audit Trails
Third party agreements	<u>Security and Privacy</u> - ensure that PHI is safeguarded at all times, even when it is no longer under the organization's direct control	-Partner Agreements and Contracts -Annual HIPAA training for partner's employees that have access to PHI -GHN Privacy Statement
Accountability	<u>Security and Privacy</u> - ensuring that a specific person or group can be held accountable for PHI use and disclosure	-GHN Security Policies and Procedures -Chief Security and Compliance Officer
Training and awareness	<u>Security and Privacy</u> - provide regular training to make certain all employees understand both the importance of protecting PHI and the means by which they must do so	-Annual HIPAA training for all employees and partner's employees that have access to PHI -GHN Privacy Statement and Terms of Use Statement





PHR Differentiators - Superior Security

The only PHR with a Healthcare Certification Authority (CA) – X.509.

- This designation applies digital certificates to ISO healthcare extensions in the certificate attributes.

A secure Private Key Infrastructure (PKI) over the Internet.

- This solution is part of three layers of encrypted security that must be verified to gain access to a PHR.

HIPAA-compliant PHR technology promotes interoperability and information exchange between other secure healthcare technologies.

- Identity proofing technology ensures that the identity of the person requesting the PHR is the same individual who received the security key.
 - USB token with the digital certificates
- ICE (In Case of Emergency) Technology
 - A proprietary security technology for Emergency First Responders is linked directly to GHN's 24-hour Help Desk





Digital Identity Management



Security Token | Smart Card



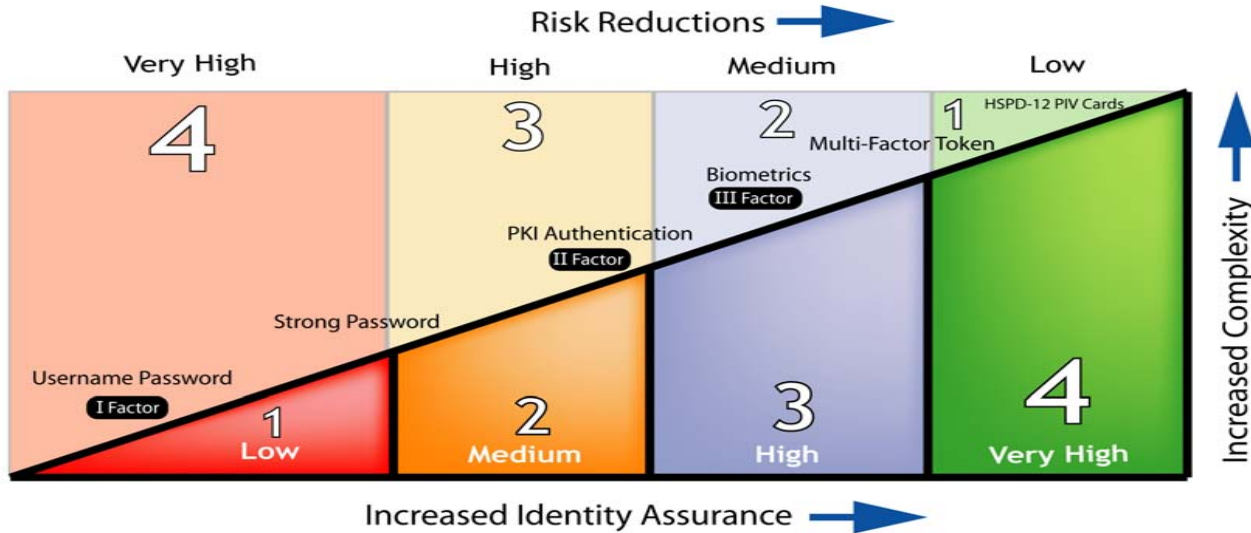
Digital Certificates for Verifying
Your Digital Identity
(Digital Signing, Authentication and Encryption)





Security Risk Assessment

Four Authentication Assurance Levels for Multiple Risk Levels



Authentication Factor Levels

I	Something you know	No Identity Validation (Website Registration)
II	Something you know, Something you have	Identity Proofing (I-9 Process)
III	Something you know, Something you have, Something you are	Risk Analytics (Lexis Nexis)
Multi	Something you know, Something you have, Something you are, Others	Security Clearance





GHN Secure™

GHN Secure: Two-Factor Authentication

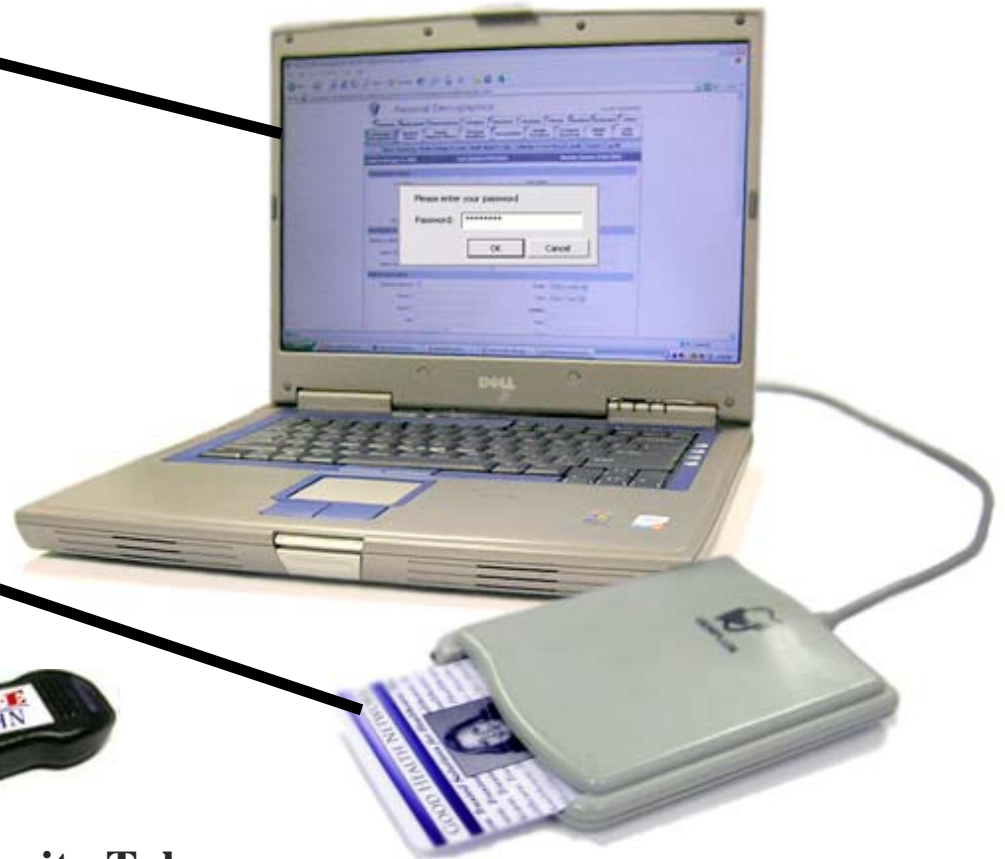
Something you know is your password



Something you have is the digital certificate on your Smartcard



or Security Token



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GHN's Personal Health Journal

- Identity proofing
- Two-factor authentication
- Roles-based access control (RBAC)
- ICE GHN
- Help Desk security questions
- Consents and authorizations
- Continuity of Care Record (CCR)
- Reminders – SMS messaging
- Accumulator with Targets/Goals
- Color-coded clinical data
- Full color-coded transparent audit trail
- Dashboards
- Tax-deductible annual tracking
- HSA tracking options
- Family account management





Impact on Consumer Empowerment

- Provide secure collaborative tools for Patients and Providers including monitoring compliance
- Establish and build trusted relationships within the Community healthcare initiatives sharing data
- Encourage Patients to be active participants in their healthcare treatment decisions
- Enabler for Consumer Driven Healthcare
- Give Patient complete control of their PHI using electronic consents, authorizations and advanced directives
- Patient can transparently see the real-time audit trail
- Supply Secure storage tools for Patient's PHI received from multiple "trusted" sources with data integrity
- Empower healthcare Consumer with an active voice and rights in an HIE through their PHR provider
- Grow a competitive PHR market with standards and certification that is consumer-friendly and affordable
- All HIE participants contribute to improving the quality of healthcare in their community





Impact on GHN

1. What are the implications of having some entities performing similar services covered by federal law (e.g., HIPAA) and others not? For example, a personal health record (PHR) could be offered by a health plan (covered entity) and an independent PHR service provider (non-covered entity). How does this impact your competitiveness?
Leveled playing field improves our competitiveness by building trust and interoperability. Compliance increases our cost to market, but it builds sufficient “trust” for patients to safely share their data with their providers.
2. How does this impact your ability to exchange information with others?
Stabilizes the “rules of engagement” for interoperability.
3. Does contracting with non-covered entities create different levels of accountability and/or enforceability in the exchange of health information?
Not if standards recommended by HITSP are required by all participants.
4. Assuming you are not a covered entity, what would be the implications of complying with enforceable confidentiality, privacy, and security requirements at least equivalent to relevant HIPAA principles?
GHN is already compliant, therefore only change would be the BAA, Privacy Statement and Terms of Use Agreements to include additional participants.
5. Is there a minimum set of confidentiality, privacy, and security protections that you think everyone should follow, if not HIPAA, what?
Standards recommended by the ANSI HITSP Technical Committees. GHN is very supportive of PHR Certification through CCHIT and would encourage the security portion to be initiated as soon as HITSP recommendations are complete.





GHN Commitment



Engaged leadership

- GHN leaders are making significant contributions
 - To the development, support and implementation of national healthcare standards
 - To national security requirements for PHR/EHR

Critical experience

- In the evolving PHR market, experience counts
 - GHN combines knowledge and expertise in extracting and integrating healthcare data
 - GHN leverages experience in credentialing, authenticating and auditing end users
 - GHN advocates transparent audit trail tools, allowing patients to monitor access to their health data
 - GHN is guided by actionable strategies for the use and adoption of PHR
 - GHN is leading the market in establishing the PHR as an interactive patient communication tool
 - GHN collaborates with communities to deliver secure tools for clinicians and consumers





Open Discussion



Thank You

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