



Privacy and Security Tiger Team Annual Executive Summary



July 1, 2010 – September 30, 2013

Background

The U.S. Department of Health and Human Services (HHS) Office of the National Coordinator for Health Information Technology (ONC) is charged with coordinating nationwide efforts of implementing and using the most advanced health information technology (IT) and electronic health information exchange. Maintaining the trust relationship between patients and health care providers is fundamental to the success of health IT and its ultimate deployment and adoption by providers and patients alike.

In 2010, the Health IT Policy Committee (HITPC), a federal advisory committee to ONC, established a subcommittee, the Privacy and Security Tiger Team (“Tiger Team”), for the purpose of making timely privacy and security recommendations to ONC. This executive summary presents an overview of the Tiger Team’s actions, composition, and achievements. This initial executive summary covers the Tiger Team’s activities from its start through September 2013. Future summaries will be generated annually.*

Actions and Impact

The Tiger Team’s work and recommendations, as adopted by the HITPC, have informed a variety of HHS efforts ranging from policy-making and program funding terms to technical assistance and education activities, including the following:

- **“Meaningful Use” Policy** – Eligible professionals and hospitals are required to conduct a security risk assessment as mandated by the Health Insurance Portability and Accountability Act (HIPAA) in order to receive incentive payments under the Medicare and Medicaid Electronic Health Record Program (known as “Meaningful Use”). HHS incorporated this recommendation into the corresponding Final Rule as an attestation requirement.
- **“Meaningful Consent” Program Guidance** – Through program information guidance, ONC encouraged its grantees to adopt the recommendation that patients be given meaningful choice when their information is shared through certain health information exchange models.
- **Notice of Privacy Practices Project** – HHS developed model Notices of Privacy Practices for health care providers and health plans to use when communicating with their patients and plan members. Model notices include a layered notice with a summary of information sharing policies and activities and how patients can obtain more information, as suggested by the Tiger Team.

* For more information, please view the *First Annual Summary of Privacy and Security Tiger Team Activities*, http://www.healthit.gov/facas/FACAS/sites/faca/files/TigerTeamAnnualSummaryBriefing_01302014_for_HITPC.pdf.



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Tiger Team Composition and Operations

The Tiger Team members are nationally recognized leaders who provide varying perspectives of patients, providers, and other health care stakeholders. Members are drawn from across the health care spectrum including academia, the vendor community, provider institutions, and non-governmental organizations that act as advocates for patients' concerns. The Tiger Team's agenda reflects issues that are raised across different offices within ONC and the health IT industry, which are then prioritized by the National Coordinator (head of ONC) and ONC's Office of the Chief Privacy Officer (OCPO).

For far-reaching, complex issues, the Tiger Team organizes public hearings for soliciting testimony from witnesses, including health IT implementers and national thought leaders. The public is also invited to provide feedback on Tiger Team issues by participating in bi-weekly virtual meetings or contributing to relevant postings on the [ONC Health IT Buzz Blog](#). The Tiger Team carefully weighs input during public deliberations.

ONC Fair Information Practice Principles and Core Values

The Tiger Team's deliberations and subsequent recommendations are based on the Fair Information Practice Principles (FIPPs), an internationally recognized framework initially developed by HHS. The Tiger Team applies FIPPs through the lens of the trust relationship that patients establish with their providers. Simply put, the patient is at the center of the team's discussions. The concerns of vendors, providers, and other organizations that play a role in health IT, as well as the issues surrounding electronic health information exchange, are also factored into the team's deliberations to generate balanced, achievable recommendations.

Achievements

In its 4+ year existence, the Tiger Team has made over 150 recommendations which span across all of the FIPPs. The HITPC adopted over 95% of these recommendations. In keeping with the patient-centric focus on trust, the majority of the Tiger Team's recommendations relate to the security principle, which advocates that patient information be safeguarded.

ONC methodically assesses all recommendations to determine the final course(s) of action. ONC partially or fully adopted over half of the recommendations. Roughly one-third of the recommendations are still being evaluated by ONC. The remaining recommendations (~15%) are action pending. ONC will continue tracking recommendations as the market develops.

Conclusion

The HITPC's Privacy and Security Tiger Team works with OCPO, providers, and other health care stakeholders to proactively address emerging issues surrounding electronic health information privacy and security. By advancing the privacy and security dialogue, the Tiger Team's actions help reinforce the trust relationship between patients and providers. The recommendations inform a variety of HHS programs and policies as well as further ONC's mission to advance the nation's use of health IT and electronic health information exchange.