



CLIENT ADVISORY

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Security Guidance for Remote Use of and Access to Electronic Protected Health Information

The Centers for Medicare & Medicaid Services (“CMS”) recently announced the publication of the “Security Guidance for Remote Use”. This publication provides the minimal compliance expectations for HIPAA covered entities seeking to shield Electronic Protected Health Information (“EPHI”) that is accessed, stored or transported offsite.

This document states that covered entities allowing remote access to or use of EPHI should place significant emphasis and attention to the following:

1. risk analysis and risk management strategies;
2. policies and procedures for safeguarding EPHI; and
3. security awareness and training on the policies & procedures for safeguarding EPHI.

In considering the above, covered entities must develop and implement such policies that 1) allow only individuals who have been trained and have proper authorization to have access to EPHI, 2) protect EPHI that is stored on remote or portable devices, or on potentially transportable media, and 3) secure EPHI that is being transmitted over an electronic communication network.

Finally, this publication provides covered entities with possible strategies to consider when developing policies relating to accessing, storing and transporting EPHI. The entire publication can be found at www.cms.hhs.gov/securitystandard/.

