

Health Care Cloud Coalition

Meeting Notes

Thursday, January 26, 2017

- Welcome Address – HC³ Team
- Guest Speaker –
Deven McGraw, Deputy Director of Health Information Privacy, HHS Office for Civil Rights

Guidance on HIPAA & Cloud Computing

<http://www.hhs.gov/hipaa/for-professionals/special-topics/cloud-computing/index.html>

- Guidance was created to help entities covered by HIPAA and their business associates understand their HIPAA obligations to protect the privacy and security of ePHI when they take advantage of cloud technologies.
- HIPAA only applies to entities that are covered entities and their business associates, NOT all cloud technologies and not all health data. HIPAA's authority is limited and the Guidance only applies within the boundaries of HIPAA authority.
- Covered Entities vs. Business Associate
- When is a CSP a Business Associate?
- CE & CSP, or BA & CSP, *must* establish HIPAA-compliant business associate agreements (BAA)
- It is ABSOLUTELY permissible for a CE and a BA to use the services of cloud service providers consistent with their HIPAA responsibilities.
- You are still a BA if the data that you are storing for your customer is encrypted and you do not have the key.
- Review of FAQs in Guidance by Deven McGraw
- Interactive Q&A with Webinar Attendees and Deven McGraw

Resources

- NIST publications, e.g., defining cloud computing
 - <http://nvlpubs.nist.gov/nistpubs/Legacy/SP/nistspecialpublication800-145.pdf>
- Existing OCR FAQs & guidance documents, e.g., sample contract provisions
 - <http://www.hhs.gov/ocr/privacy/hipaa/understanding/coveredentities/contractprov.html>
- ONC resources, e.g., recommendations for EHRs
 - <http://www.healthit.gov/providers-professionals/ehr-privacy-security>

****A/V – The Webinar Recording in full length is available to HC³ Members as a member benefit.
Membership information is provided below.**

PLEASE JOIN US FOR OUR NEXT MEETING!

February 2017 – HC3 Monthly Meeting

Cloud Security Alliance

Thursday, February 16th, 2017

1:00 p.m. – 2:00 p.m. EST

MEMBERSHIP

To learn more about becoming an HC³ Member, please visit our [website](#).

Contact Kat Barlow, Director of Membership with any questions: kat@hcccoalition.org

Company Revenue	Monthly Membership
Companies with \$1 billion or more in revenue/year	\$1000
Companies with \$100 million or more, but less than \$1 billion in revenue/year	\$500
Companies with \$10 million or more, but less than \$100 million in revenue/year	\$200
Companies with \$1 million or more, but less than \$10 million in revenue/year	\$75
Companies with less than \$1 million in revenue/year but older than 3 years	\$25
Startups with less than \$1 million in revenue/year but less than 3 years	Free

Not-for-profit organizations qualify for a 50% discount on all membership fees.