



Cloud-Based Solutions: A Good Option for Hosting CDS for Immunizations

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Agenda

- Cloud vs Traditional Computing
- CDS for Immunizations
- Cloud Hosting Models for CDS
- Resources
- Wrap-up



Cloud vs Traditional Computing

- Traditional: Computer software deployed on specific servers housed with the organization or a service provider
- Cloud: “Virtualized” environment that can be expanded or reduced based on changing needs without affecting the physical server infrastructure underneath
 - Enables service-oriented architecture
 - Allows more flexible, scalable, modular architectures
 - Less concern about physical location of apps, data, services

Cloud vs Traditional Computing

System Deployed in a Cloud	Yes	Outsourced Virtualized Environment ("Public Cloud")	In-sourced Virtualized Environment ("Private Cloud")
	No	External Hosting at Co-location Facility	Traditional In-house Hosted Server
		No	Yes
		System Housed Within the Organization	

SWOT: Traditional In-house Hosted Server

Strengths:

- Leverages existing infrastructure.
- Services/applications can easily be isolated from one another for security or other considerations.
- Costs are fixed and easier to predict/budget.
- Servers are easy to control and secure.

Weaknesses:

- Servers are fixed-capacity resources that require periodic capital investment to maintain and expand.
- Highly-skilled staff required 24x7 to operate and secure platforms.
- As needs change the computing environment is often slow to adjust.
- Little opportunity to leverage across programs/systems.
- Outwardly-focused applications put more and more pressure on limited Internet bandwidth.

Threats:

- Industry is moving to cloud-based services more and more.
- This alternative may get more and more expensive to maintain in terms of equipment and skilled labor.

Opportunities:

- Hardware continues to be a commodity item whose price vs performance continues to decline.

SWOT: External Hosting at a Co-Io Facility

Strengths:

- Burden of low-level operations passed on to a vendor better equipped and resourced to support the server environment.
- Services/applications can easily be isolated from one another for security or other considerations.
- Costs are fixed and easier to predict/budget.
- Servers are easy to control and secure.
- More and more affordable Internet bandwidth available especially for outwardly-facing applications.

Weaknesses:

- Servers are fixed-capacity resources that require periodic capital investment to maintain and expand.
- As needs change the computing environment is often slow to adjust.
- Little opportunity to leverage across programs/systems.
- May require virtual private network (VPN) to provide secure access back to the organization.

Threats:

- Industry is moving to cloud-based services more and more.
- This alternative may get more and more expensive to maintain in equipment costs.

Opportunities:

- Hardware continues to be a commodity item whose price vs performance continues to decline.
- An alternative scenario is the use of vendor-owned servers which lowers the capital cost for organizations while providing variable amounts of computing power.

SWOT: Outsourced, Virtualized Environment

Strengths:

- Burden of low-level operations passed on to a vendor better equipped and resourced to support the server environment.
- Services/applications can easily be isolated from one another for security or other considerations.
- Capacity, and therefore cost, can vary more flexibly based on the "needs of the moment."
- More and more affordable Internet bandwidth available especially for outwardly-facing applications.
- Enables location-independent access to systems and services.
- Allows for more flexible and robust disaster recovery/business continuity implementations.

Threats:

- The cloud service provider market is consolidating so there still can be a negative impact if the organization chooses the wrong vendor."
- While most HIPAA breaches occur from lost, stolen, or compromised mobile devices, a conspicuous breach on a cloud service could adversely impact the market in a big way.
- Some jurisdictions simply disallow public cloud deployment by law or policy, largely on security/privacy grounds.

Weaknesses:

- Servers are outside of the organization's physical control.
- Additional security issues may be exposed by the shared virtual environment.
- Cloud providers are big targets for Internet-based attacks including denial-of-service attacks that might limit system availability.
- May require virtual private network (VPN) to provide secure access back to organization.
- Initial setup expense may be larger than a single project or organization can bear.

Opportunities:

- HIPAA-compliant environments are available.
- Cloud-based computing becoming more accepted in the public and healthcare sectors.
- Significant potential for cost sharing among projects, agencies, and organizations through the use of shared platforms.
- Promotes "greener" environment by reducing the need for commuting and central physical presence by staff.

SWOT: In-sourced, Virtualized Environment

Strengths:

- Organization retains physical control over servers.
- ~~Services/applications can easily be isolated from one another for security or other considerations.~~
- Individual application/system capacity, and therefore cost, can vary more flexibly based on the "needs of the moment."
- Enables location-independent access to systems and services.
- Allows for more flexible and robust disaster recovery/business continuity implementations.

Threats:

- ~~Industry is moving to cloud-based services more and more.~~
- This alternative may get more and more expensive to maintain in equipment costs.

Weaknesses:

- Highly-skilled staff required 24x7 to operate and secure platforms.
- Outwardly-focused applications put more and more pressure on limited Internet bandwidth.
- Cost of virtualization software may be more than an organization can bear.
- There must be a sufficient quantity of servers procured to make the initial virtual environment setup worth configuring.
- Capacity adjustments constrained by overall size of virtual environment deployed by the organization.

Opportunities:

- Hardware continues to be a commodity item whose price vs performance continues to decline.
- Cloud-based computing becoming more accepted in the public and healthcare sectors.
- Significant potential for cost sharing among projects, agencies, and organizations through the use of shared platforms.



Clinical Decision Support for Immunizations

CDC Definition:

“an automated process that determines the recommended immunizations needed for a patient and delivers these recommendations to the healthcare provider... (it provides) healthcare providers with immunization evaluation and forecasting tools designed to automatically determine the recommended immunizations needed when a patient presents for vaccination.”

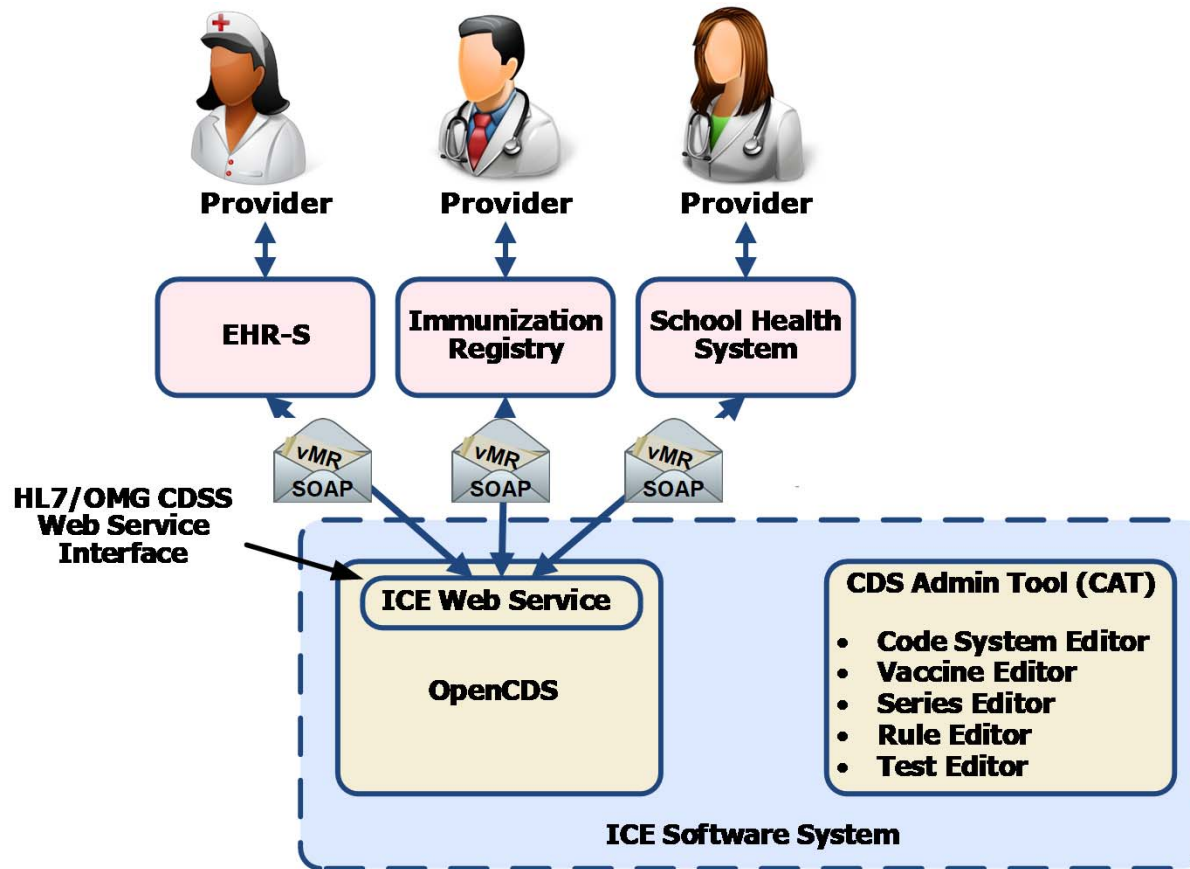
<https://www.cdc.gov/vaccines/programs/iis/cdsi.html>



Why Host CDS in the Cloud?

- Reduced barriers of entry for new users.
- Hosting of core service and administrative tools are separable.
- Relatively lightweight products to deploy.
- Secure (even HIPAA-certified) cloud service providers readily available.
- Less responsibility over runtime environment if externally hosted.
- Avoids additional regulation.
- Avoids additional diligence and effort on security.
- Avoid distraction from other more crucial activities.

Example CDS for IZ Service: ICE





Cloud Hosting Realities: IIS

- **CDS Service:** Some IIS are looking for a turnkey solution that involves little effort or expertise on their part. Others may be concerned about performance with a remotely-hosted service. Some agencies might not permit external hosting by policy.
- **CDS Administration:** While most IIS have the expertise and interest in defining and even maintaining their own rules, CDC and AIRA are pressing for increased standardization making shared rules more attractive if forecaster is ACIP and CDC CDSi-compatible.
- **Mixed model:** This might involve an IIS deploying its own service but relying on a vendor to configure it and manage the rules, or offer other *ad hoc* assistance.



Cloud Hosting Realities: EHR

- **CDS Service:** Most EHR-S vendors would likely want to run and maintain their own service. Some might want a fully-hosted service, but would likely require a rigorous service level agreement and a reliable, scaled solution.
- **CDS Administration:** Many EHR vendors are less interested in maintaining their own rules so long as they are assured of ACIP compliance.
- **Mixed model:** This might involve an EHR deploying its own service but relying on a vendor to configure it and manage the rules, or offer other *ad hoc* assistance.



Implications for Public Health

- Cloud computing is simply an alternative way to provide server resources, one in which the resources are scalable on demand.
- Some jurisdictions simply disallow server deployment outside of the agency (cloud-configured or not) by law or policy, but programs would be well advised to *not* accept a 'No' based on policy without investigation.
- Cloud computing shifts the cost of providing server capacity from a capital expense to an operational expense.
- Independently-certified public cloud computing services can be acquired with reasonable guarantees of security for the server environment.
- Steep up-front set-up charges that are imposed by some cloud service providers could be mitigated by sharing an environment.
- Current IIS product/product support vendors are all engaged in supporting cloud-based deployments and even prefer this type of implementation.



Resources

Resource Name/Description	URL
Cloud Standards Consumer Council	http://www.cloud-council.org/
EHNAC: Cloud-enabled Services Accreditation Program	http://www.ehnac.org/cloud-enabled-services/
HHS: <i>Guidance on HIPAA & Cloud Computing</i>	http://www.hhs.gov/hipaa/for-professionals/special-topics/cloud-computing/index.html
HLN: <i>Encrypting Data at Rest on Servers: What does it get you?</i>	https://www.hln.com/encrypting-data-at-rest-on-servers-what-does-it-get-you/
IEEE: Standards in Cloud Computing	http://cloudcomputing.ieee.org/standards
NASCIO: <i>Capital in the Clouds</i> (7 part series)	https://www.nascio.org/Publications/PID/485/evl/0/CategoryID/49/CategoryName/Capital-Cloud-Series
NIST Cloud Computing Program	https://www.nist.gov/programs-projects/nist-cloud-computing-program-nccp



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