診療記録の外部保存に クラウドを使うべきか?

@Sea Gaia 2010

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本日の発表の位置づけ

- 診療記録の外部保存の検討
 - 医療制度、情報処理技術に関する素養はあるが、法制度については素人
 - ユーザの視点から勉強して学際的に問題提起
 - 医療機関、病院情報システムの置かれている立場についてご理 解いただく

背景~データの増大

- 診療記録の保管は法律で最低5年間の保存
- 10年以上の半永久的保存が多数
 - 米国診療情報管理学会(AHIMA)、日本診療記録学会報告より
- 電子カルテによる長期保存、検索の容易化
- 社会的要請
 - 薬害訴訟やがん対策などLife longにわたる疫学的研究
- 事業継続計画(BCP: Business Continuity Plan)の強化
 - 電子カルテ化に伴うシステム停止による病院運営の影響増大

背景~データの増大

- 医用画像技術の進歩による画像データの指数的増大
- 従来は数枚~数十枚
 - より高解像度の画像を数百枚~数千枚
- 結果 一つのケースで画像サイズが数十MBから数百 MBへアップ





背景~ システムのコスト圧縮への圧力

③ 朝日新聞社

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国際的な競争力の源泉である医療費 車1台で店頭価格差50万円を生み出す力



http://www.oecd.org/document/16/0,3343,en_2649_34631_2085200_1_1_1_37407,00.html

背景 (まとめ)

- 保存の長期化 → システムの耐用年数問題
- データ容量の増大 → ストレージの運用・増設問題
- ・ システム運用コスト圧縮 → アウトソーシング、消費した ストレージ容量のみへの支払い
- BCPに対応したシステム運用 → 遠隔地への外部保存

▶ 家家記録の外部保存としての
 ▶ ストレージクラウドの可能性に着目

診療記録の外部保存に関する状況整理

- ストレージクラウドの位置づけ(ガイドライン)不在
- 事業者の国際的広がり、データの所在の問題
- 法規制間の整合性
- 個人情報の定義・再考

- ストレージクラウドの位置づけ(ガイドライン)不在
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Storage Cloudの例

00		Diome	de Storage Hybrid	Cloud Storage (Offsite Data Storage		
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http://www.mhlw.go.jp	/topics/bu	Diomede Storage	Hybrid Cloud S				+
	DIOME STORA	E de Age					Î
с	Cloud Storage	Compare	Get Started	Demo Videos	Applications		
_							
	Hybrid Storage	Clean and	Green CAS + M	AID + HSM	Price Leader	Secure & Reliable	
		Less	than 0.5 mic	owatts pe	r MB		
		data. We a	orid car shifting between g are the industry leader in storage types depending o e. Storing backups with o	energy-efficient dat n your files' specific	a storage services. Diome performance requirement	ide offers th s - Online,	こり3円/月
		Get Star	ted!				/
w	lelcome to Dio	mede Stora	ge	Enterpr	ise Storage from	n \$0.03/GB	
	omede Storage is an en eclalizing in backup, arc		d storage service ng data storage services.	replication to	ansactions used during th	al storage, bandwidth, and he prior month. It's a simple or only what you have used. The	
din		programming inter	ors can use Diomede faces. End users can use ns and services with more	minimum m fees or extra	onthly fee is \$3.00 per m	onth, and there are no hidden	
	equently becoming avail			Storage (t	riple-redundant, no cor er GB - Offline Storage		

Developers

Diomede is designed to make large-scale data storage easier for developers, IT administrators, and end users. We provide the storage and bandwidth horsepower you need for today's leading backup and archival applications far more efficiently than in-house solutions or generic cloud storage services. Diomede Storage is more than 5 times less expensive than Amazon S3 and our Offline Storage systems يقدرها المصافات منفاة متعاف ومحاف ومحاد والمحاد المحاد والمحاف والمحاد

- \$0.03 per GB Offline Storage per month
- \$0.08 per GB Nearline Storage per month
- \$0.10 per GB Online Storage per month

Bandwidth

- \$0.075 per GB Uploads (all data transfer in)
- \$0.075 per GB Downloads (all data transfer out)

Replication

- \$0.01 per GB Offline Storage Replication Read
- \$9.95 per hour Offline Storage Replication Read Requests

ストレージクラウドの位置づけ (ガイドライン)不在

表 1・1 ASP・SaaSの分類

分類の特徴	各分類の ASP・S	aaS の特徴
提供形態の特徴 による区別	単独型	利用者に対して ASP・SaaS を、1 事業者がすべて 提供するもの。
	連携型	1事業者が利用者と契約を結び、他の複数の事業者 のサービスを組み込んでサービス提供するもの。
利用形態の特徴	追独利用	特定の ASP・SaaS を 1 利用者だけが利用する場合
による区別	生活利用	特定のASP・SaaSを複数の利用者が共同して利用 する場合
外部保存に着目 した区別	トランザクション 型サービス	利用者から送信されたデータを ASP・SaaS で処理 を行い、送信されたデータの保存は行わない。
	外部保存型サービ ス	利用者から送信されたデータを ASP・SaaS で処理 を行うほか、送信されたデータの保存も行う。

出典:ASP・SaaS事業者が医療情報を取り扱う際の安全管理に関するガイドライン平成21年7月



サービス提供者が国内で個人情報を預かり、操作を行う視点での議論。 ユーザが自ら個人情報を預ける視点での議論が少ない。

ASP・SaaS における情報セキュリティ対策ガイドラインASP・SaaS の情報セキュリティ対策に関する研究会 平成20年1月30日 SaaS 向け SLA ガイドライン 平成20年1月21日 経済産業省

SaaS/ASPとDaaSの相違点

表 2 SaaS と DaaS の相違点

分類	SaaS 形式	DaaS 形式
アプリケーシ	SaaS 提供者により提供	提供なし。ファイルシステ
э У		ムに準じた API の提供
データの保管	SaaS 提供者によるアプリケ	ユーザが格納するデータを
	ーションに依存し、アプリ	選択し、保管する
	ケーションの独自データ形	
	式で保存される。ユーザの	
	直接の関与は少ない	
データの life	SaaS 提供のアプリケーショ	保存、移動、削除はユーザ
cycle	ン上の操作に連動する	の指示に基づいて行われる
データの暗号	SaaS 提供のアプリケーショ	ユーザ側の処理に依存。暗
化・セキュリ	ンの仕様によって処理され	号化、署名が付加的サービ
ティ	る	スとして提供されることも
		ある
データセンタ	国内利用が多い	国際的に散在

ガイドラインの傾向

- データの置き場所は地理的制約はないはずだが、国内に閉じた話に終始。
- 海外にデータ、サーバを置くという視点での議論を回避している?
- 電子カルテ、地域医療連携は国内指向にならざるを得ない
 ネットワーク上の応答性能(ネットワーク上の距離)
 - 開発者とのコミュニケーション
- しかし、データの置き場所自体は国内に限定する理由はない。

- ストレージクラウドの位置づけ(ガイドライン)不在
- 事業者の国際的広がり、データの所在の問題
- 法規制間の整合性
- 個人情報の定義・再考

YALE大学、Gmailの採用を保留



Gmail採用保留の理由

- Fischer said concerns about the switch to Gmail fell into three main categories: problems with "cloud computing" (the transfer of information between virtual servers on the Internet), technological risks and downsides, and ideological issues.
- Google stores every piece of data in three centers randomly chosen from the many it operates worldwide in order to guard the company's ability to recover lost information <u>but that also</u> <u>makes the data subject to the vagaries of foreign laws and</u> <u>governments</u>, Fischer said. He added that Google was not willing to provide ITS with a list of countries to which the University's data could be sent, but only a list of about 15 countries to which the data would not be sent.



Map of all Google data center locations

Posled in Main on April 11th, 2008 by Pingdom

<u>Data Center Knowledge</u> recently published a <u>"Google Data Center FAQ"</u>. As most other web geeks, we here at Pingdom tend to find this kind of information quite fascinating. We have extracted some interesting ticbits, and also used the information to construct a map with all current and underconstruction Google data center locations that are known today.

So how many data centers do Google use, and where are they?

Google data center locations

If you include data centers that are under construction, Google has 19 locations in the US where they operate data centers, 12 in Europe, one in Russia, one in South America, and three in Asia. Not all of the locations are dedicated Google data centers, since they sometimes lease space in other companies' data centers.



Above: Google data centers world wide.



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About the Royal Pingdom blog

This is the Royal Pingdom blog, a weblog by the staff at <u>Pingdom</u> about the Internet, Web development and technology, and o² course cur own services. Pingdom offers services to monitor the uptime and performance of websites and servers.



^{Buggood}
•
冗長性確保のために、複数のデータセ ンターにミラーリング

•どこにミラーリングしているかは説明なし Cloud C

22nd October 2009 76 Portland Place London, UK Early teeking Discourt Ends 25thSept - Register Nowl www.cloudwf.com

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- 法規制間の整合性
- 個人情報の定義・再考



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14.1. Notwithstanding anything to the contrary, we may seek injunctive or other relief in any state, federal, or national court of competent jurisdiction for any actual or alleged infringement of Amazon's or any third party's intellectual property and/or proprietary rights. Any dispute relating in any way to your visit to the AWS Website or to products or services sold or distributed by AWS or its affiliates in which the aggregate total claim for relief sought on behalf of one or more parties exceeds \$7,500 shall be adjudicated in any state or federal court in King County, Washington, and you consent to exclusive jurisdiction and venue in such courts. You further acknowledge that our rights in the Amazon Properties are of a special, unique, extraordinary character, giving them peculiar value, the loss of which cannot be readily estimated and may not be adequately compensated for in monetary damages.

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First Look At Amazon's	Oregon Data Center	visiting the CA
	事業者と	
		同じ国内であれば
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😑 😑 😁 Amazon cops to stalled data center • The Register			
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Free whitepaper – Network performance management: What it is good for? Amazon has acknowledged that it's behind the 116,700-square-foot data center no longer under construction on the banks of the Columbia River in Boardman, Oregon. Oracle, Sun speed-launch Exadata V2 Bechtolsheim: The server is not the network 			
After construction began on the \$135m facility last year, a local paper pegged Amazon as the tenant. But only now, as weeds pop up around the unfinished facility, has the web giant confirmed its ownership. The data center is officially owned by an outfit dubbed Vadata, but speaking with <i>Information Week</i> , Amazon acknowledged that Vadata is a logal optity that belongs to Amazon.			
In a statement, the company told <i>The Reg</i> much the same thing. evaluate the requirements for our infrastructure capacity and are investment decisions," a spokeswoman said. "While we are unitinually adding resources to support our customers, we don't disclose specific location for security reasons and don't comment on rumors and speculation."			
That said, Amazon has previously disclosed data centers in Ashburn, Virginia; Dallas/Fort Worth; Los Angeles; Miami; Newark, New Jersey; Palo Alto, California; Seattle; St. Louis; Amsterdam; Dublin; Frankfurt; London, Hong Kong; and Tokyo. And for what it's worth, our request was forwarded to the spokeswoman who oversees Amazon Web Services, the company's so-called compute cloud	Ă.		
company's so-called compute cloud.	<u></u>		

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- "個人情報の保護に関する法律についての経済産業分野を対象とするガイドライン",経済産業省,2004.
- ・ 「個人情報」とは、生存する「個人に関する情報」であって、特定の個人を識別することができるもの(他の情報と容易に照合することができ、それにより特定の個人を識別することができるものを含む。)をいう。「個人に関する情報」は、氏名、性別、生年月日等個人を識別する情報に限られず、個人の身体、財産、職種、肩書等の属性に関して、事実、判断、評価を表すすべての情報であり、評価情報、公刊物等によって公にされている情報や、映像、音声による情報も含まれ、暗号化されているかどうかを問わない。

厚生労働省の解釈

 "「医療・介護関係事業者における個人情報の適切 な取扱いのためのガイドライン」に関するQ&A(事 例集)",厚生労働省,2006

Q2-2ガイドラインp6で「『個人に関する情報』は・・・暗号化されているか否かを問わない」 と記載されていますが、暗号化されることで特定の個人を識別できなければ「個人情報」 に該当しませんか

A2-2「個人に関する情報」であっても、暗号化により特定の個人を識別できなければ 「個人情報」に該当しません。なお、暗号化された情報であっても、個人情報との対応 表を保有している場合など、他の情報と容易に照合することができ、それにより特定の 個人を識別できる場合は「個人情報」に該当します。

個人情報を含む医療情報は暗号化した上で、ストレージクラウドに保管すればよいのか?

http://www.mhlw.go.jp/topics/bukyoku/seisaku/kojin/dl/170805iryou-kaigoqa.pdf

- 暗号化アルゴリズムの安全性評価に基づく暗号化した情報の流通に関するガイドライン
- 保存と公開の運用の整理
- 預託データ回収に関するガイドライン整備
- 情報開示に関する整理

電子証明書の有効期間は鍵の強度と保護する情報の価値の相対的評価で決定

・どの暗号化アルゴリズムを用いれば、どの間、「個人情報」とはみなさなくて済むかの目安が欲しい。

有効期間がすぎれば別の鍵で再暗号化する運用

- 暗号化アルゴリズムの安全性評価に基づく暗号化した情報の流通に関するガイドライン
- 保存と公開の運用時の2種類の認証基盤の整理
- 預託データ回収に関するガイドライン整備
- 情報開示に関する整理

SaaS/ASPではこの問題は暗黙的・未分離な問題として論じられることが少ない

	フェイズ	対象	目的
No. No. No.	外部保存時	事業者を含む、当事者以外 のすべて	個人情報の秘匿 改竄防止
	情報開示時	患者·保険会社等	否認防止(組織・作成者の 証明) 改竄防止

- 暗号化アルゴリズムの安全性評価に基づく暗号化した情報の流通に関するガイドライン
- 保存と公開の運用の整理
- 預託データ回収に関するガイドライン整備
- 情報開示に関する整理

 ・事業停止による預託したデータ回収が不可能になるリスク 情報も「資産」として保護する時代では?
 金融におけるペイオフ制度相当のものは?

この懸念を払拭できない限り、情報資産を組織内に設置したサーバ等の固定資産と結びつける発想から進歩できない。

- 暗号化アルゴリズムの安全性評価に基づく暗号化した情報の流通に関するガイドライン
- 保存と公開の運用の整理
- 預託データ回収に関するガイドライン整備

○ 情報開示に関する整理

国際的にデータを保管する場合、保管先の法規制による開示請求(ex米国愛国者法、英国操作権限法)にどう応えるか?

結語~ユーザの立場から

- ストレージクラウドの位置づけ(ガイドライン)不在
 - ・ アプリケーション、国内指向だけではなく、インフラ 指向・国際指向のガイドライン作りを!
- 事業者の国際的広がり、データの所在の問題
- 個人情報の定義・再考
- 法規制間の整合性
 - → 個人情報法護法について再考の余地あり。
 - → 国際競争力の確保を考えて欲しい