Introduction

- Security program covers The Queen’s Health Systems (QHS)
  - The 4 hospitals (Punchbowl, West Oahu, Molokai General Hospital, North Hawaii Community Hospital)
  - Diagnostic Laboratory Services & CareResource Hawaii
  - The Queen Emma Land & Development entities
- This includes approximately
  - 7,000 employees
  - 1,900 medical staff (a portion of which are employees)
  - Vendors & contractors with access to sensitive information
Introduction

- Security group
  - Technical team (5, includes the Manager) – manages technical controls and incident response
  - Privacy Analyst (1) – data loss monitoring & prevention program
  - IT Disaster Recovery Coordinator (1) – IT disaster recovery & business continuity planning
  - Together, group also responsible for risk management, vendor management, awareness & training, reporting

- Information Technology (IT) Relationship
  - A part of QHS IT reporting to the Chief Information Officer (CIO)
  - Work closely with affiliate IT staff

HIPAA Security Rule Overview

- A Covered entity must
  - Ensure the Confidentiality, Integrity & Availability (CIA) of ePHI
  - Protect against any reasonably anticipated threats to CIA
  - Protect against any reasonably anticipated unauthorized ePHI disclosures

- Includes two types of standards
  - Required. These must be implemented
  - Addressable. There is some flexibility based on if the requirement is reasonable and appropriate

HIPAA Security Rule Overview

- Managing ‘reasonable’, ‘anticipated’, ‘appropriate’
  - Risk assessment
  - Required standard

- In addition to HIPAA, QHS Security Program
  - Ensure compliance to the Hawaii breach notification requirements
  - Cover all sensitive data including PHI, financial information, QHS proprietary
  - Cover physical and electronic media
  - ISO 27001 Standard was used to initially develop the program
Risk Management Overview

- What HIPAA states
  - Conduct a thorough assessment of the risks to CIA
  - Implement security measures (i.e. controls) to reduce risks to a reasonable and appropriate level
  - Security measures must be review/modified as needed
- QHS approach
  - Risk management drives the security program
  - Ongoing process with continual updates as threats change, controls are implemented and new services are evaluated.
  - Do produce an annual HIPAA Risk Assessment report which is a point-in-time view of QHS risk posture

Risk Management Approach

- The basics
  - Identify threats and risks (real-world examples to follow)
  - Assess existing controls for applicability and effectiveness to mitigate risks
  - Rate risks based on likelihood and potential impact
  - Develop plans to address any risks rated above tolerance
- Considerations
  - This is purposely a simple approach to facilitate easy training and maximum involvement of IT & non-IT experts and stakeholders
  - Executive management and/or oversight involvement key in developing impact thresholds (i.e. risk appetite). Example, how much financial loss would be considered ‘high’ impact.
  - The FFIEC IT Handbook (for financial institutions) has practical information on how to develop a risk management program.

Security Challenges

- New controls may be met with resistance
  - May mean additional steps to perform one’s job
  - Monitoring may be seen as intrusive
  - May be seen as an impediment to business
- Risk Management Benefits
  - Ensure risk is evaluated by objective criteria
  - Ensure proposed control will reduce the risk
  - Encourages participation and input
  - Facilitates communication and therefore understanding & buy-in on why the control is necessary
Security Program & Trained Workforce

Trained employees are arguably the most important component of a successful security program.

- Security policies and procedures
- New hire and annual Compliance training incorporates security training
- Communication opportunities when incidents occur (QHS-specific or broad issues such as ransomware attacks)
- Targeted training on specific threats (see 'phishing' below)
- Counseling on policy violations (see 'data loss' below)

Key Risks & Mitigation

In addition to a trained workforce:

- The following slides detail the key threats that QHS faces (as determined by the Risk Management program)
- Included with each threat are some of the steps QHS has taken to mitigate the risks
- None of these risks are unique to QHS

Data Loss

Inappropriate transmission of sensitive data

- E-mail to unauthorized recipient
- Internet uploads (Dropbox, attached to Gmail/Yahoo)

Data loss monitoring (aka Data Loss Prevention – DLP)

- Monitoring all outbound e-mail and Internet traffic
- DLP system uses rules to identify certain fields (such as SSN)
- System also utilizes 'fingerprinting' which involves uploads of QHS-specific information (such as medical record numbers)
- Violators are notified and asked to ensure deletion of the data
- Violations are escalated based on data quantity
Phishing

E-Mails crafted to entice the recipient to perform a risky function
■ Click malicious links or attachments
■ Send a wire or provide confidential information to the fraudster

Mitigate with a combination of user training and filtering controls
■ Workforce trained during compliance training and with periodic fake phishing campaigns (those who succumb are auto-enrolled in additional training)
■ Workforce procedures to report the phish so that we may block links and other actions to eliminate the threat
■ E-Mail filtering to block the majority of malicious e-mail (on average QHS blocks 65% of external e-mail)
■ Adding a banner to indicate e-mail originated from an external source to encourage diligence

Loss of Theft

Lost or stolen laptop, phone, USB drive
■ Company owned or employee device
■ Concern if device houses sensitive information or is set up to access company resources

Tight controls over devices that are not in physically secure locations
■ Full disk encryption of all desktops & laptops
■ Mobile device management for any device that can access e-mail
■ Restrict USB access to only approved devices (i.e. those encrypted with password protection)

Note: While HIPAA lists encryption as an addressable control, history shows that fines & penalties can be large when lack of encryption leads to a breach.

Malware (including Ransomware)

Malware is broad term to include malicious programs, including virus and ransomware
■ Create a path for hacker to control a system, exfiltrate data
■ Ransomware encrypts files and requires payment in order to retrieve the unlock key
■ Other mischief such as logging passwords or denial of service attacks

Common delivery method is e-mail so previously mentioned e-mail filtering & phish controls, plus
■ Web filtering to block malicious sites
■ Workstation controls such as anti-virus software
■ Patching and backups
Web Browsing

Overlaps with other risks (see Malware, Data Loss); additionally

- Known bad sites
- Legitimate sites that have been compromised
- Inappropriate (gambling, adult) or abuse of company resources (excessive bandwidth usage)

Additional use of filtering tools

- Multiple layers to detect 'bad' or compromised sites
- Policy enforcement for inappropriate sites
- Logging for forensics or when bandwidth utilization research needed

Unauthorized Access

Access to applications & infrastructure

- Employee, contractor or other workforce member accesses resources inappropriately
- Terminated/disgruntled workforce member with intent to do harm
- Hacker

Various controls

- Manage terminations – timely access removal
- Periodic revalidations
- Monitoring (see 'Undetected Event')
- Password complexity, idle timeout, dormant account disable
- Multi-factor authentication (when warranted by risk)

Undetected Event

Event occurs that breached other defenses

- Hacker
- Malware
- Physical Intruder

Security Operations – monitoring & incident response

- Sensors at key points of infrastructure & applications
- Logs from malware and web/e-mail filtering tools
- Authentication systems logs
- Security Incident & Event Management (SIEM) tool combined with 24x7 Security Operations Center (SOC) monitoring.
Vendor, 3rd Party Risk

Risk that a vendor is compromised
■ Susceptible to any of the above risks
■ Breach of our data entrusted to their care
■ Launching point to hack QHS systems

Vendor Security Management
■ Accredit the security program of vendors that will receive sensitive information and/or perform high risk functions
■ Periodically review accreditation (period set by risk)
■ Tightly limit access to internal resources

Summary

Key takeaways
■ Risk management program is essential to validate controls, identify gaps and prioritize remediation.
■ Understand the HIPAA Security Rule and ensure requirements are met/addressed
■ Additional standards available to guide program development such as ISO & NIST
■ Various tools are available to validate a security program: HHS Risk Assessment tool, HITRUST cross reference spreadsheet, security consultants, etc.
■ Balanced approach; ensure business needs are met and that security does not place an onerous burden on the organization.