

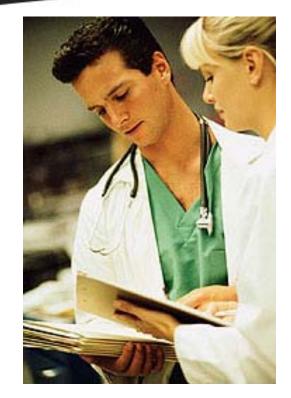
⊿'∽y <u>Ali</u> Pabrai, CISSP, CHSS





Healthcare Security Challenges





- Password management
- InfoSec policies
- Contingency plans
- Malicious software
- Wireless proliferation
- Audit capabilities
- IT staff's security capabilities



Security Today

- "99% of all reported intrusions result through exploitation of known vulnerabilities or configuration errors, for which safeguards and countermeasures are available" NIST
- "The health care industry was subject to the third highest number of severe events" Symantec



Standards & Regulatory Compliance

Seriously influence security architecture priorities:

- ISO 17799/BS7799
- HIPAA
- FISMA
- Sarbanes-Oxley
- GLB
- California Privacy Laws



ISO 17799 and BS 7799 Security Standards

Covers Ten Areas:

- 1. Security Policy
- 2. Security Organization
- 3. Asset Classification and Control
- 4. Personnel Security
- 5. Physical and Environmental Security
- 6. Computer & Network Management
- 7. System Access Control
- 8. System Development and Maintenance
- 9. Business Continuity Planning
- 10. Compliance



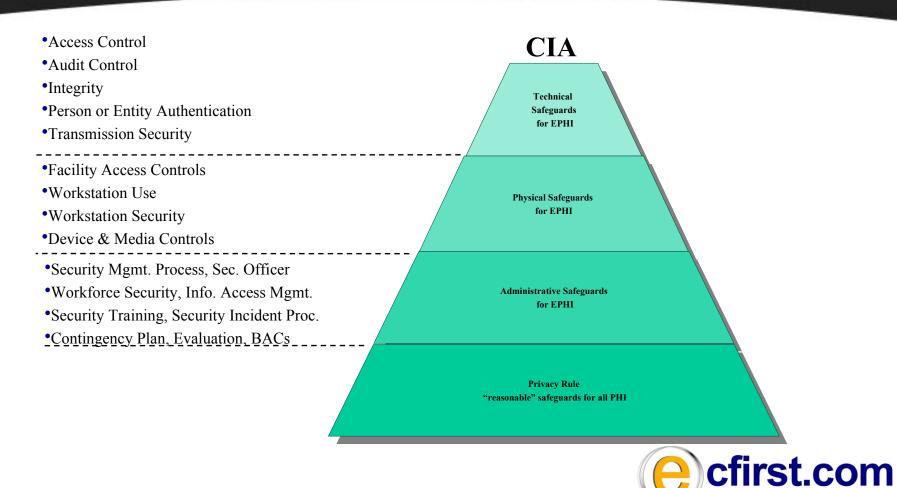
HIPAA Security



Е

н

ALTHCARE



FISMA



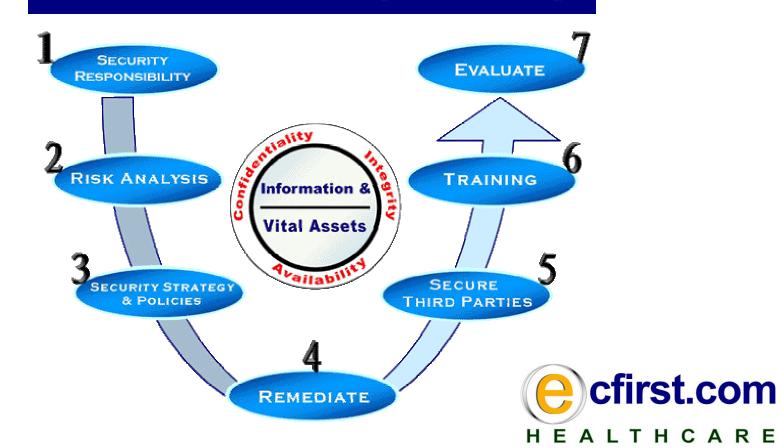
EALTHCARE

- The Federal Information Security Management Act (FISMA) is Title III of the U.S. E-Government Act (Public Law 107-347)
- It was signed into law by U.S. President George W. Bush in December 2002.
- FISMA impacts all U.S. federal information systems
- The FISMA legislation is about protecting information and information systems from unauthorized access, use, disclosure, disruption, modification, or destruction in order to provide CIA

Enterprise Security Roadmap







Risk Analysis

 "Every covered entity must conduct an <u>accurate</u> and <u>thorough assessment</u> of the potential <u>risks</u> and <u>vulnerabilities</u> to the confidentiality, integrity and availability of its electronic Protected Health Information (EPHI)"

HIPAA Security Rule

- Not just a paper exercise
- Technical Review must be completed



Security Strategy and Policies

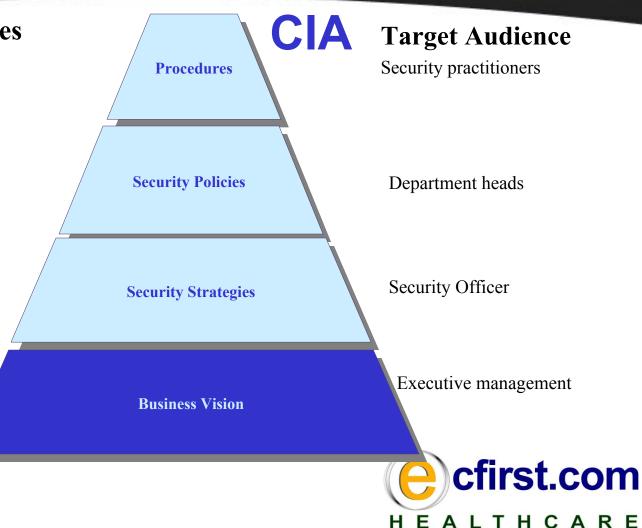


Activities Document security procedures Develop plans for physical security

Determine gaps that need policies Validate contingency and other plans Align policies with strategy

Align strategy with business goals Analyze technology architecture Evaluate role of third parties

Understand the business Understand future goals

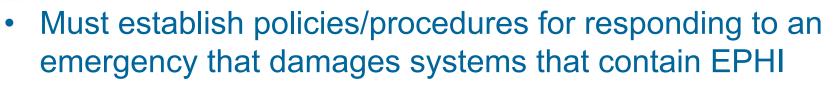


Contingency Plan

- It is a Federal law that must be complied with
- A HIPAA Security Rule Standard that includes:
 - Data Backup Plan (R)
 - Disaster Recovery Plan (R)
 - Emergency Mode Operation Plan (R)
 - Testing and Revision (A)
 - Applications and Data Criticality Analysis (A)
- Requirements also further identified under Physical and Technical Safeguards



Core Objectives



- Core objectives include the capability to:
 - Restore operations at an alternate site
 - Recover operations using alternate equipment
 - Perform some or all of the affected business processes and associated EPHI using other means
- Must develop a coordinated strategy that involves plans, procedures and technical measures to enable the recovery of systems, operations, and data after a disruption

THCARE

Typical Security Remediation Initiatives



- Deploy Firewall Solutions, IDS/IPS
- Secure Facilities & Server Systems
- Deploy Device & Media Control Solutions
- Implement Identity Management Systems
- Deploy Access Control Solutions
- Implement Auto-logoff Capabilities
- Deploy Integrity Controls and Encryption
- Activate Auditing Capabilities
- Test Contingency Plans



Wireless Challenges

- Lack of user authentication
- Weak encryption
- Poor network management
- Vulnerable to attacks:
 - Man-in-the-middle
 - Rogue access points
 - Session hijacking
 - DoS



Wireless Strategy

- Conduct risk analysis
- Develop security policies
 - Wireless
 - Mobile devices
 - Encryption
- Remediation: Design infrastructure
 - Firewall
 - IDS
 - Wired network



Secure Third Parties



- Review existing Business Associate Contracts (BACs) or equivalent
 - Privacy compliance should have covered most of these relationships
 - Verify the flow of your sensitive information to BAs
- BAs are part of a Chain of Custody
 - Don't be the "weakest link"
 - Be sure to pass along requirements to protect sensitive to your subcontractors



Train Workforce



- Establish Processes for:
 - Security Reminders
 - Protection from Malicious Software
 - Login Monitoring
 - Password Management



Evaluate & Audit

- Establish Processes for:
 - Risk Management
 - Audit
- Deliverables:
 - Ensure compliance with legislation(s) and standard(s) as required
 - "Close and Lock" all Security Gaps



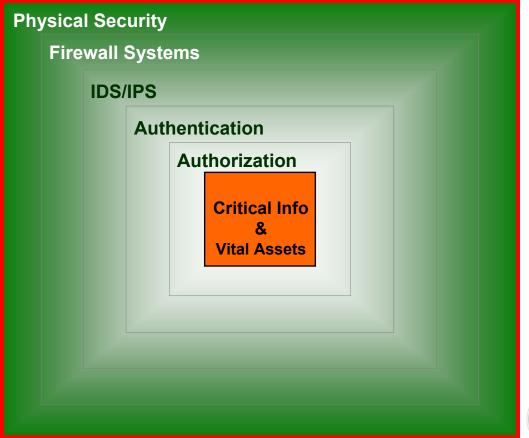
The Importance of Audits



- Audit on a regular basis
- Audits conducted must be <u>thorough</u> and <u>comprehensive</u>
- Strong audit trails help the entity ensure the CIA of sensitive information and other vital assets
- Key to responding to Security incident/complaint



Defense In-Depth





Summary: Serious Risk

- Centralize management of ALL critical servers, Internet access, wireless APs
- Ensure secure flow and storage of not just EPHI, but all vital information
- Recognize IT as a fast emerging:
 Strategic asset, Critical asset
- Raise employee communication & training, morale
- Security: An Executive Priority



Enterprise Security Goals



Establish your enterprise security objectives. These may include:

- 1. Ensure confidentiality, integrity & availability of all sensitive business information
- 2. Protect against any reasonably anticipated threats or hazards to the security or integrity of information
- 3. Protect against any reasonably anticipated uses or disclosures of such information that are not permitted or required
- 4. Ensure compliance with legislations and standards as required



CIA - Security





Thank You!





The Art of Information Security Available ONLY at www.ecfirst.com

Pabrai@ecfirst.com

