

The 25th National HIPAA Summit
Special Fall Edition

Sep. 14 - 16, 2016 • Washington, DC



Establishing a Credible Cybersecurity Program

September 2016



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Member FBI InfraGard

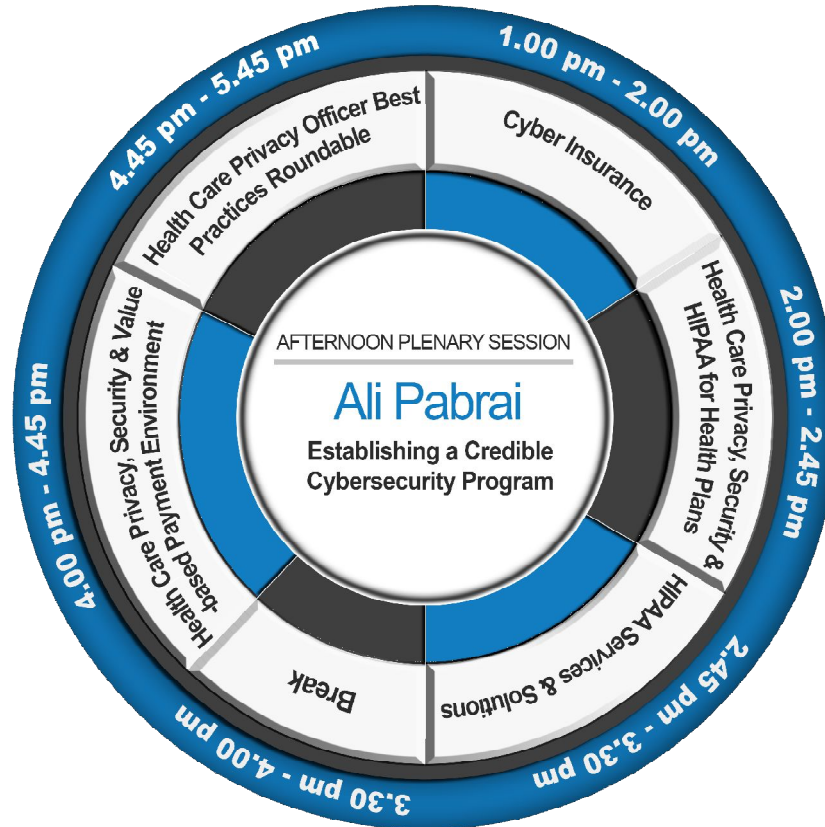


AFTERNOON PLENARY SESSION

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AGENDA

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- **Cyber Risk = *Disruptive* Business Risk**
 - Breaches: banks, retailers, healthcare
 - Cyber attack lifecycle
- **Risk Assessment**
- **Standards**
- **Preparation**
- **Assessing Controls**
 - Firewalls to Encryption
 - Vulnerability Assessments & Pen Tests
- **Establishing an Enterprise Cyber Security Plan**
- **December 31, 2016**





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The Risk!



Key Sources of Cyber Attack

| # | Required Activities | STATUS | | Your Response? |
|----|-------------------------------|--------------------------|--------------------------|----------------|
| | | Yes | No | |
| 1. | Criminal syndicates, 59%. | <input type="checkbox"/> | <input type="checkbox"/> | |
| 2. | Employee, 56% | <input type="checkbox"/> | <input type="checkbox"/> | |
| 3. | Hactivists, 54% | <input type="checkbox"/> | <input type="checkbox"/> | |
| 4. | Lone-wolf hacker, 43% | <input type="checkbox"/> | <input type="checkbox"/> | |
| 5. | External contractor, 36% | <input type="checkbox"/> | <input type="checkbox"/> | |
| 6. | State-sponsored attacker, 35% | <input type="checkbox"/> | <input type="checkbox"/> | |

Health Security Priority in 2016!

| # | Required Activities | STATUS | | Your Response? |
|----|--|--------------------------|--------------------------|----------------|
| | | Yes | No | |
| 1. | Data leakage/Data loss prevention, 56% | <input type="checkbox"/> | <input type="checkbox"/> | |
| 2. | Business continuity/Disaster recovery, 55% | <input type="checkbox"/> | <input type="checkbox"/> | |
| 3. | Identity & access management, 47% | <input type="checkbox"/> | <input type="checkbox"/> | |
| 4. | Security awareness & training, 44% | <input type="checkbox"/> | <input type="checkbox"/> | |
| 5. | Incident response capabilities, 44% | <input type="checkbox"/> | <input type="checkbox"/> | |
| 6. | Security operations (e.g. encryption, patching), 41% | <input type="checkbox"/> | <input type="checkbox"/> | |



ERNST & YOUNG

THE WALL STREET JOURNAL

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Challenges to Information Security Operations

| # | Required Activities | STATUS | | Your Response? |
|----|--|--------------------------|--------------------------|----------------|
| | | Yes | No | |
| 1. | Budget constraints, 62% | <input type="checkbox"/> | <input type="checkbox"/> | |
| 2. | Lack of skilled resources, 57% | <input type="checkbox"/> | <input type="checkbox"/> | |
| 3. | Lack of executive awareness or support, 32% | <input type="checkbox"/> | <input type="checkbox"/> | |
| 4. | Lack of quality tools for managing information security, 28% | <input type="checkbox"/> | <input type="checkbox"/> | |
| 5. | Management & governance issues, 28% | <input type="checkbox"/> | <input type="checkbox"/> | |
| 6. | Compliance/regulation issues, 23% | <input type="checkbox"/> | <input type="checkbox"/> | |



CYBER ATTACKS: GLOBAL & SOPHISTICATED

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Iran Cyber Attacks

- Used common SQL injection, spear phishing & other attacks to gain initial access
- Next, used privilege escalation exploits to compromise additional systems & move deeper inside the compromised firm

Sony

- Used highly sophisticated malware to carry out the attack

Chase

- Hackers compromised flaw in bank web-site
- Hackers reached deep into enterprise infrastructure
- Gigabytes of customer account & other data siphoned slowly
- Attack routed through several countries, including Brazil, & then re-directed to Russia

How robust is your patch management?



RESULTS OF A RECENT CYBER ASSESSMENT!

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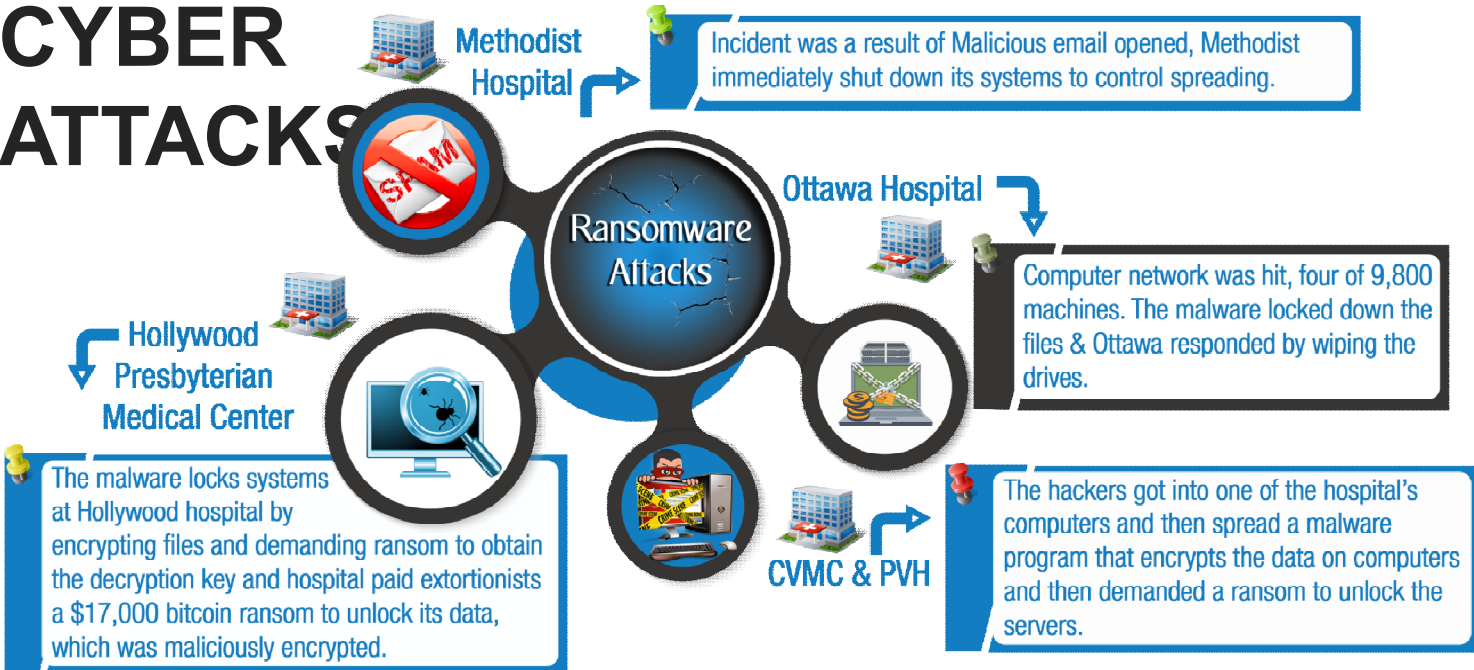
| THREAT | IMPACT |
|-------------------------------|--|
| Remote Code Execution | Complete Control of the System |
| Unsecured PII | Breach |
| System configuration issues | Loss of Data |
| Buffer Overflow Vulnerability | Denial of Service Attack or Complete Control of the System |



RANSOMWARE E

CYBER ATTACKS

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Prepare?



HIPAA FINES 2016



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Fine: \$5.55M

Advocate Health Care Network

August 4, 2016

Attestation

CAP: 2 Years

Fine: \$2.75M

The University of Mississippi Medical Center

July 21, 2016

Attestation

CAP: 3 Years

Fine: \$2.7M

Oregon Health & Science University

July 18, 2016

Attestation

CAP: 3 Years

Fine: \$650K

Catholic Health Care Services

June 29, 2016

Attestation

CAP: 2 Years

Fine: \$2.2M

New York Presbyterian

April 21, 2016

Attestation

CAP: 2 Years

Fine: \$750K

Raleigh Orthopaedic Clinic, P.A. of North Carolina

April 20, 2016

Attestation

CAP: 2 Years

Fine: \$3.9M

Feinstein Institute for Medical Research

March 17, 2016

Attestation

CAP: 3 Years

Fine: \$1.55M

North Memorial Health Care

March 16, 2016

Attestation

CAP: 2 Years

Fine: \$25K

Complete P.T., Pool & Land Physical Therapy, Inc.

Feb 16, 2016

Attestation

CAP: 3 Years



COST OF BREACHES: EIGHT FIGURE RISK!

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**Over
\$25M
Settlement**



TARGET



**Over
\$130M
Settlement**



**\$25M
Settlement**

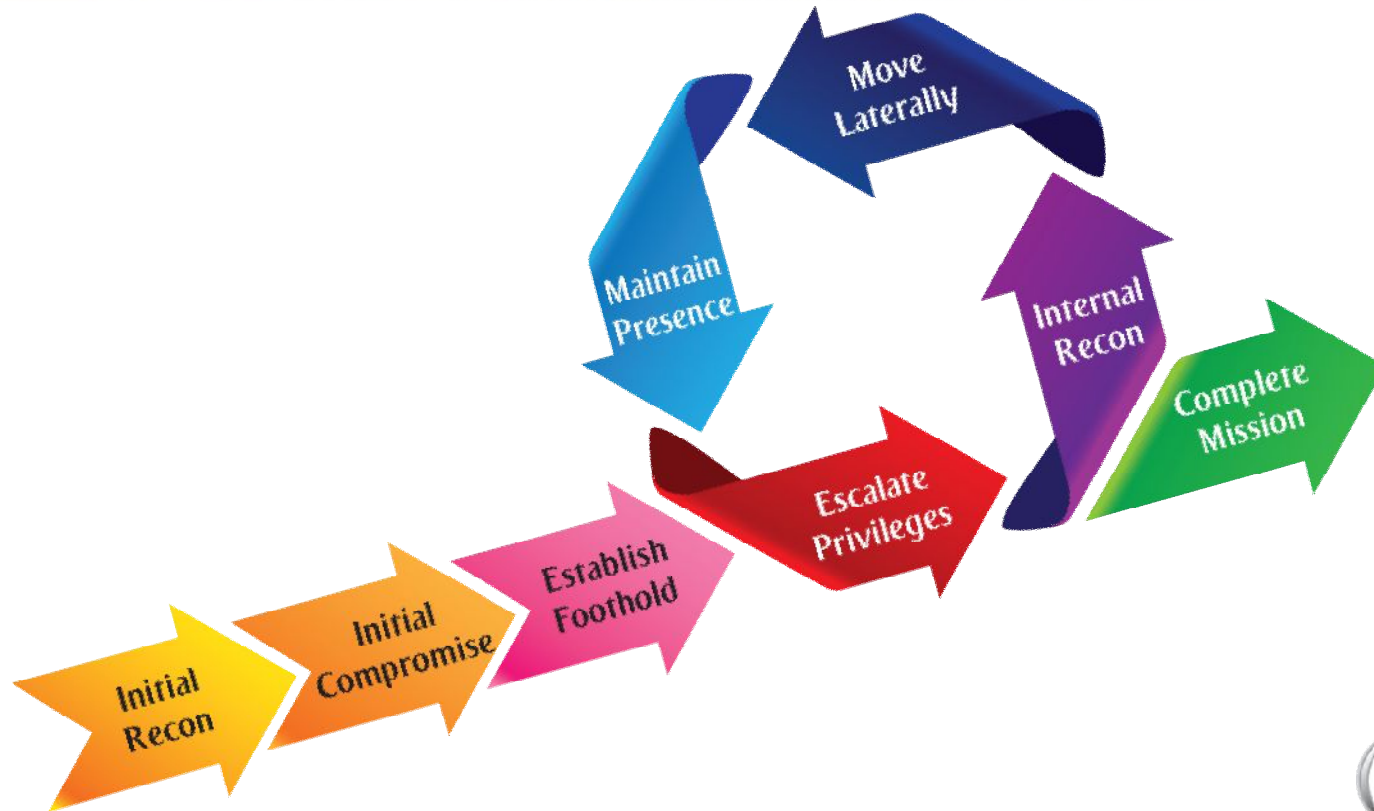


CYBER ATTACK LIFECYCLE

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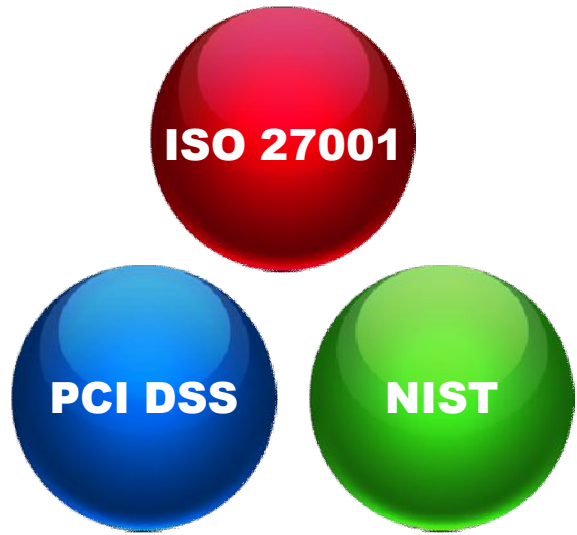
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Standards



COMPLIANCE MANDATES



HITRUST
Authorized CSF Assessor



ISO 27001: A GLOBAL STANDARD

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| ISO 27002: 2013 |
|--|
| Information Security Policies |
| Organization of Information Security |
| Human Resource Security |
| Asset Management |
| Access Control |
| <i>Cryptography</i> |
| Physical & Environmental Security |
| Operations Security |
| Communications Security |
| System Acquisition, Development & Maintenance |
| <i>Supplier Relationships</i> |
| Information Security Incident Management |
| Information Security Aspects of Business Continuity Management |
| Compliance |



PCI DSS: IMPORTANT REFERENCE

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| PCI DSS Requirements | Testing Procedures |
|---|---|
| 12.1 Establish, publish, maintain, and disseminate a security policy that accomplishes the following: | 12.1 Examine the information security policy and verify that the policy is published and disseminated to all relevant personnel (including vendors and business partners). |
| 12.1.1 Addresses all PCI DSS requirements. | 12.1.1 Verify that the policy addresses all PCI DSS requirements. |
| 12.2 Includes an annual process that identifies threats, and vulnerabilities, and results in a formal risk assessment. (Examples of risk assessment methodologies include but are not limited to OCTAVE, ISO 27005 & NIST SP 800-30). | 12.2.a Verify that an annual risk assessment process is documented that identifies threats, vulnerabilities, and results in a formal risk assessment. |



NIST & RISK ASSESSMENT

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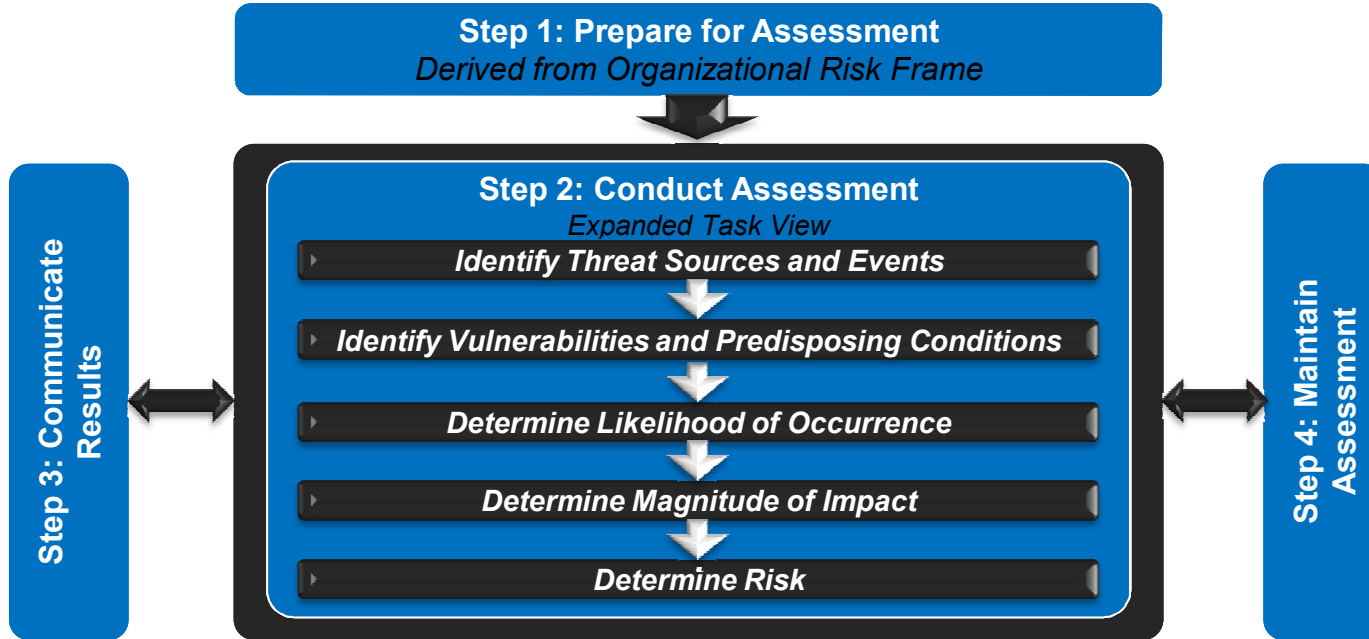
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NIST SP 800-30 REV 1: RISK ASSESSMENT

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RISK ASSESSMENT PROCESS



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A Hybrid
Conference
and Internet
Event



Closing Thoughts



ASSESSING ENCRYPTION!

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| AREA | STATUS | | Comments |
|--------------------------|--------------------------|--------------------------|----------|
| | YES | NO | |
| Database Servers | <input type="checkbox"/> | <input type="checkbox"/> | |
| PII/PHI on Cloud Systems | <input type="checkbox"/> | <input type="checkbox"/> | |
| Backup Media | <input type="checkbox"/> | <input type="checkbox"/> | |
| Desktops | <input type="checkbox"/> | <input type="checkbox"/> | |
| Laptops | <input type="checkbox"/> | <input type="checkbox"/> | |
| Tablets | <input type="checkbox"/> | <input type="checkbox"/> | |
| Smart Phones | <input type="checkbox"/> | <input type="checkbox"/> | |
| USB Devices | <input type="checkbox"/> | <input type="checkbox"/> | |
| Email | <input type="checkbox"/> | <input type="checkbox"/> | |
| Text Messages | <input type="checkbox"/> | <input type="checkbox"/> | |
| Remote Access | <input type="checkbox"/> | <input type="checkbox"/> | |
| Wireless | <input type="checkbox"/> | <input type="checkbox"/> | |
| Transmission | <input type="checkbox"/> | <input type="checkbox"/> | |



CREDIBLE RISK ASSESSMENT?

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Conduct a VA | 1

Validate & Remediate Findings | 2

Pen Test | 3



SECURITY CONTROLS & COMPLIANCE

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Key Security Controls

Implemented

Missing

Firewall (*Sonic Firewall TZ210*)

Two-factor authentication

IDS (*Dell SecureWorks*)

DLP

Antivirus protection (*Webroot*)

Secure text messaging

Data transfer (*SFTP, HTTPS*)

USB & portable device encryption

Remote access (*VPN, Citrix*)

MDM

Asset management (*Dell KACE*)

Laptop encryption (*TrueCrypt at the Bios Level; Windows OS & File Vault on Mac OS*)

Email encryption (*Voltage*)



AN ANNUAL CHECKLIST

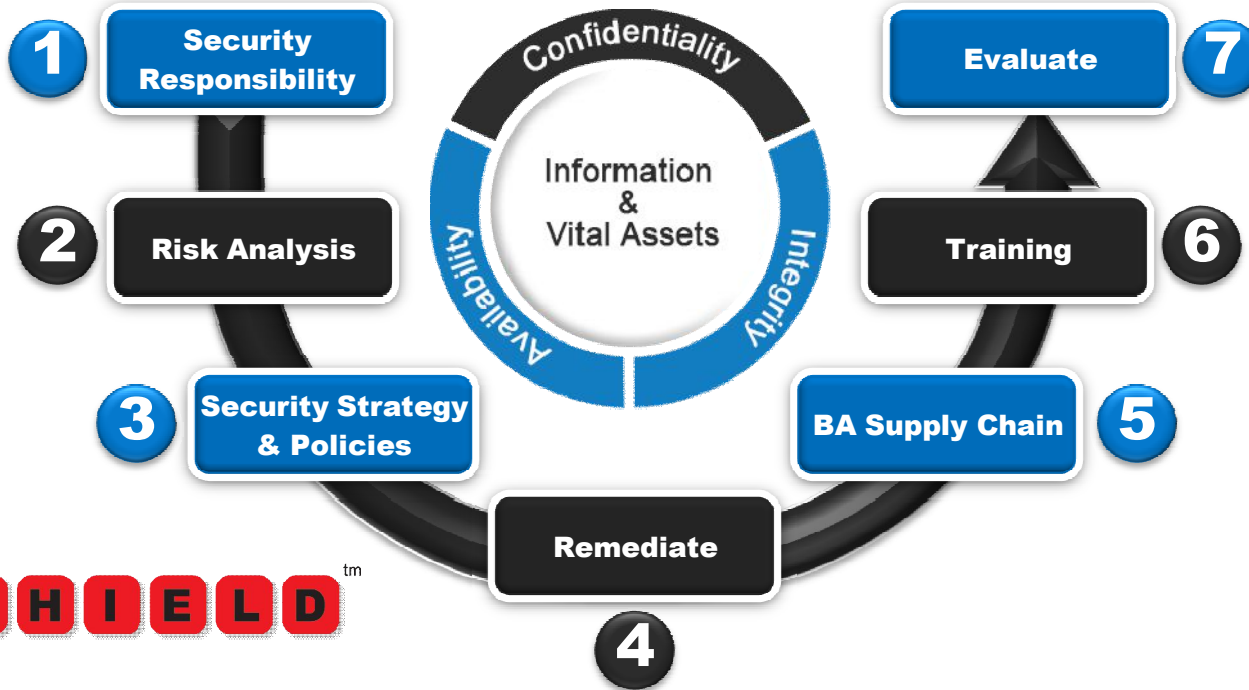
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The Seven Steps to Enterprise Security™



ENTERPRISE CYBER SECURITY PLAN



Sample Topics

Key Facts

- Compliance Mandates to Meet Priorities
- Security Priorities in 2016
- Compliance Priorities in 2016
- Current Security Controls
- Security Control Deficiencies
- Security Control Priorities in 2016

Risk Analysis – Scope & Timeline

- Vulnerability Assessment – Scope & Timeline
- Penetration Testing

Documentation

- Security Policies – Summary
- Privacy Policies – Summary
- Security Procedures – Summary

Contingency Plan

- Business Impact Analysis (BIA) in 2016
- Disaster Recovery Plan (DRP)

Incident Response Plan

- Breach Discovery & Reporting Tools

Audit Controls

- Log Automation & Consolidation Tools

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December 31,

What is the state of your enterprise security & compliance?

Establish a *credible* cybersecurity program!





Compliance & Cyber Sec



TRAINING
Certification

Training & Certification
CHA • CHP • CSCS • CCSA



Managed Compliance
Managed Security



Security Risk Assessment
HIPAA • PCI DSS • ISO 27000 • NIST



On-Demand Consulting
Flexible • Flat Rate • Fixed Cost



HITRUST
Authorized CSF Assessor

PCI Security Standards Council™
QUALIFIED SECURITY ASSESSOR

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San Diego, CA | Sep 20-21

Las Vegas, NV | Dec 6-7

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From this compliance & security training program you will:

- Examine HITECH & the HIPAA Security Rule, including Final Rule updates
- Learn about FISMA, NERC CSS, & GLBA
- Step through the core requirements of PCI DSS
- Analyse ISO 27001, ISO 27002, ISO 27799
- Examine California's SB 1386, SB 541, AB 1950, AB 1298, AB 211 & other U.S. State information security related regulations
- Walk thru NIST security standards

San Diego, CA | Sep 22-23

Las Vegas, NV | Dec 8-9

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An Executive Cyber Security Program

- First executive training program designed to enable development of a cyber security program in the class.
- The CCSASM training validates knowledge and skill sets in cyber security with particular focus and emphasis on the development of an applicable cyber security incident response and an enterprise cyber security program.

Las Vegas | Dec. 10, 2016

Orlando, FL | Feb. 24, 2017

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About Your Presenter

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Ali Pabrai, MSEE, CISSP (ISSAP, ISSMP)

Information Security & Compliance Expert

- Consults extensively with technology firms, government agencies and business associates
- Created *bizSHIELD*[™] – a Signature Methodology - to address compliance & information security priorities
- Featured speaker at InfoSec conferences worldwide
- Presented at Microsoft, Kaiser, Intuit, E&Y, Federal & State Government agencies & many others
- Established the HIPAA Academy & CSCS Programs – gold standard for cyber security & compliance solutions
- Interim CISO for large health system with 35+ locations across the USA
- Member InfraGard (FBI)
- www.facebook.com/ecfirst & www.facebook.com/Pabrai.



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