EXAMPLE A CYBER RISK MANAGEMENT

Live Web Event

A Patient Safety - Cyber Risk Discussion with Benoit Desjardins, M.D., Ph.D., FAHA, FACR, CISSP, C|EH

October 8, 2020

© Clearwater Compliance | All Rights Reserved



Legal Disclaimer

Although the information provided by Clearwater Compliance may be helpful in informing customers and others who have an interest in data privacy and security issues, it does not constitute legal advice. This information may be based in part on current federal law and is subject to change based on changes in federal law or subsequent interpretative guidance. Where this information is based on federal law, it must be modified to reflect state law where that state law is more stringent than the federal law or other state law exceptions apply. This information is intended to be a general information resource and should not be relied upon as a substitute for competent legal advice specific to your circumstances. YOU SHOULD EVALUATE ALL INFORMATION, OPINIONS AND RECOMMENDATIONS PROVIDED BY CLEARWATER IN CONSULTATION WITH YOUR LEGAL OR OTHER ADVISOR, AS **APPROPRIATE.**

Copyright Notice

All materials contained within this document are protected by United States copyright law and may not be reproduced, distributed, transmitted, displayed, published, or broadcast without the prior, express written permission of Clearwater Compliance LLC. You may not alter or remove any copyright or other notice from copies of this content.

*The existence of a link or organizational reference in any of the following materials should not be assumed as an endorsement by Clearwater **Compliance LLC.**







- Slide materials Link In Chat Box 1.
- All attendees are in "Listen Only Mode" 2.
- Please ask content related questions in "Q&A" 3.
- In case of technical issues, use / check "Chat" 4.
- Please participate in all polls 5.
- Please complete Exit Survey when you leave our session **Recorded version, final slides, and Certificate of Attendance** will be shared with you within 24 hours
- 6. 7.











Introduction to Clearwater



Leading provider of cyber risk management and HIPAA compliance software and solutions for healthcare



100% success rate when deliverables submitted to the Office for Civil Rights (OCR)



Approximately 400 customers, including 68 IDNs, many with multiyear Enterprise Cyber Risk Management (ECRM) programs



Founded in Nashville in 2009, colleagues in 20+ states, growing rapidly



Portfolio company of Altaris Capital Partners, a healthcare PE firm with \$4.8B under management



CLEARWATER HEALTHCARE CYBER RISK MANAGEMENT



Your Presenters:



Bob Chaput, MA, CISSP, HCISPP, CRISC, C|EH, CIPP/US, NACD CERT Cyber Risk Oversight

Executive Chairman & Founder, Clearwater

- Executive | Educator | Entrepreneur
- Leading authority on healthcare compliance, cybersecurity, and enterprise cyber risk management
- 40+ years in Business, Operations, Technology & Cyber Risk Management
- 25+ years in Healthcare
- Contributing author to Wolters Kluwer's *Health Law and Compliance Update* and the American Society of Healthcare Risk Management (ASHRM)'s *Health Care Risk Management Fundamentals*
- Global Healthcare Executive: GE, JNJ, HWAY
- Responsible for some of largest, most sensitive healthcare datasets in world
- Industry Expertise and Focus: Healthcare Covered Entities and Business Associates
- Member: NACD, IAPP, ISC², CHIME/AEHIS, HIMSS, ISSA, IAPP, ISACA, HCCA







Your Presenters:



Benoit Desjardins, MD, Ph.D., FAHA, FACR, CISSP, C EH

- 20+ years in Diagnostic Radiology
- Associate Professor of Radiology and Medicine, University of Pennsylvania
- Funded by National Institute of Health
- Ph.D. in Theoretical Artificial Intelligence
- Expertise in Cardiovascular Imaging, Artificial Intelligence and Cybersecurity
- Consultant for FBI in matters of cybersecurity
- Member (Medical): ACR, RSNA, NASCI, ISMRM, SCMR, AHA, HRS, AHA
- Member (Cyber): ISC2, HIMSS, HSCC, SIIM
- Black Belt (Tae Kwon Do), Wood Badge (BSA), Competitive Marksman



Associate Professor of Radiology at the Hospital of the University of Pennsylvania



Pause and Poll

1. What type of organization do you represent?

Hospital / Health System / IDN **Other Covered Entity Business Associate** Hybrid Don't Know







Discussion Flow

- Introduction
- A View from the Front Lines
- Patient Safety / Cyber Risk Discussion
- Q&A

STOP YBER **BLEEDING**

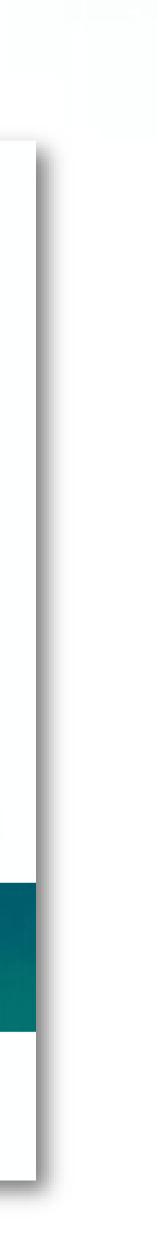
What Healthcare Executives and Board Members Must Know About Enterprise Cyber Risk Management (ECRM)

> HOW TO SAVE YOUR PATIENTS, PRESERVE YOUR REPUTATION, AND PROTECT YOUR BALANCE SHEET

B **O B**



https://www.clearwatercompliance.com/stopthecyberbleeding



When Something "Cyber" Happens

0

CHAPTER 1

When Something "Cyber" Happens

First, do no harm.

~ HIPPOCRATES

rs. Smith, a polarizing politician, has a cough. Her voice \mathbf{V} is hoarse, and she has also been feeling tired and weak. She's been a little bit "off" in her recent public appearances, so much so, that the media have been speculating about what health issues she might be dealing with.

She visits an internist in your organization. The internist orders a regular (non-stat) CT (Computerized Tomography) scan. However, unbeknownst to the hospital, a hacker has already infiltrated the radiology department network. The evening before Mrs. Smith's CT scan, when janitorial staff entered the building to clean, a man slipped into the radiology department and placed a "man-in-the-middle" device on the network near the CT scanner. It took only seconds for him to position the simple device, which enabled a wireless access point to the network.

STOP HE BER BLEEDING

Ō

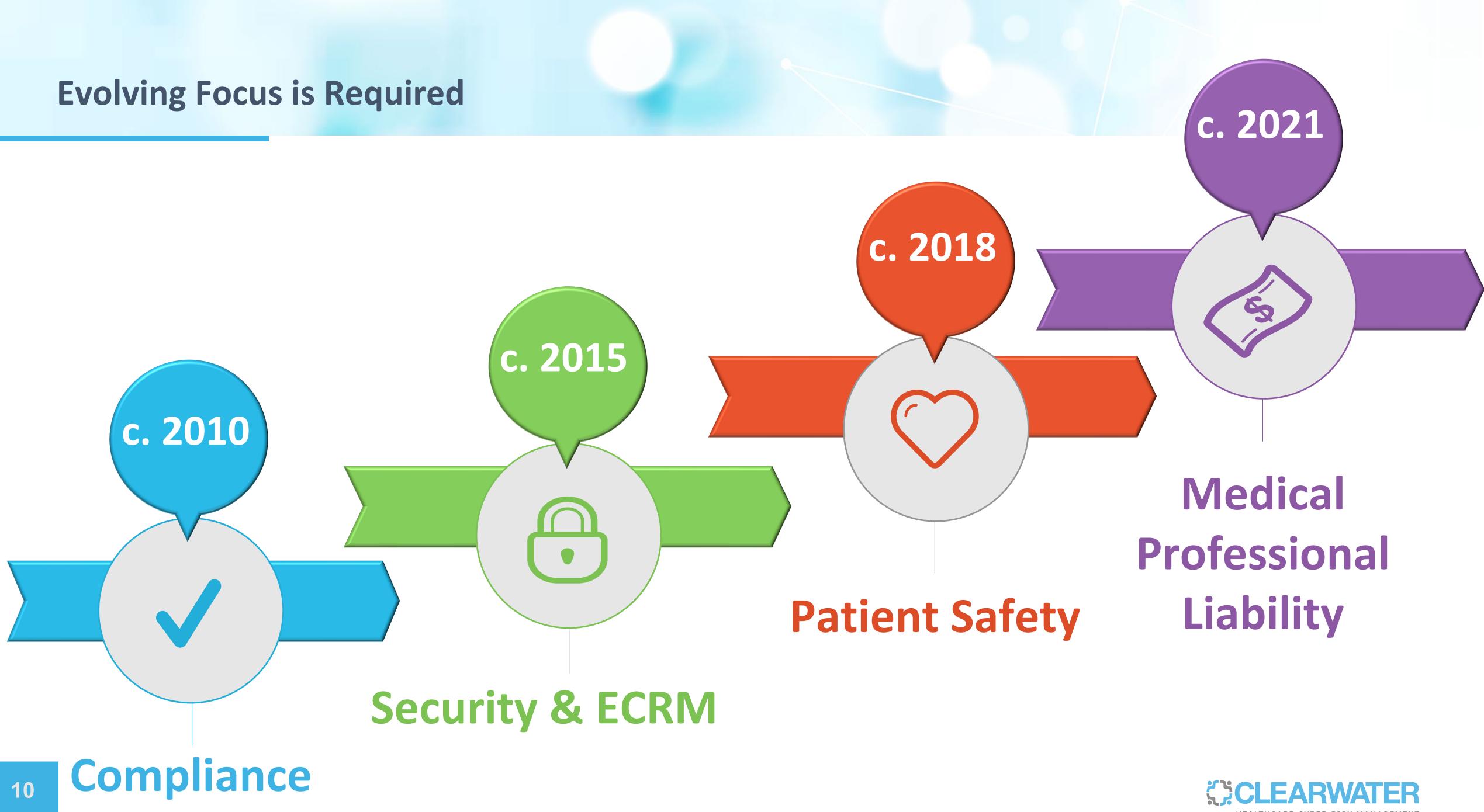
What Healthcare Executives and Board Members Must Know About **Enterprise Cyber Risk Management** (ECRM)

> HOW TO SAVE YOUR PATIENTS, PRESERVE YOUR REPUTATION, AND PROTECT YOUR BALANCE SHEET

BOB CHAPUT

The Attack









Our Core Responsibility

What if my Sensitive **Information is** shared?

What if my Sensitive **Information is not there** when it is needed?



AVAILABILITY

What if my Sensitive **Information is not** complete, up-to-date and accurate?

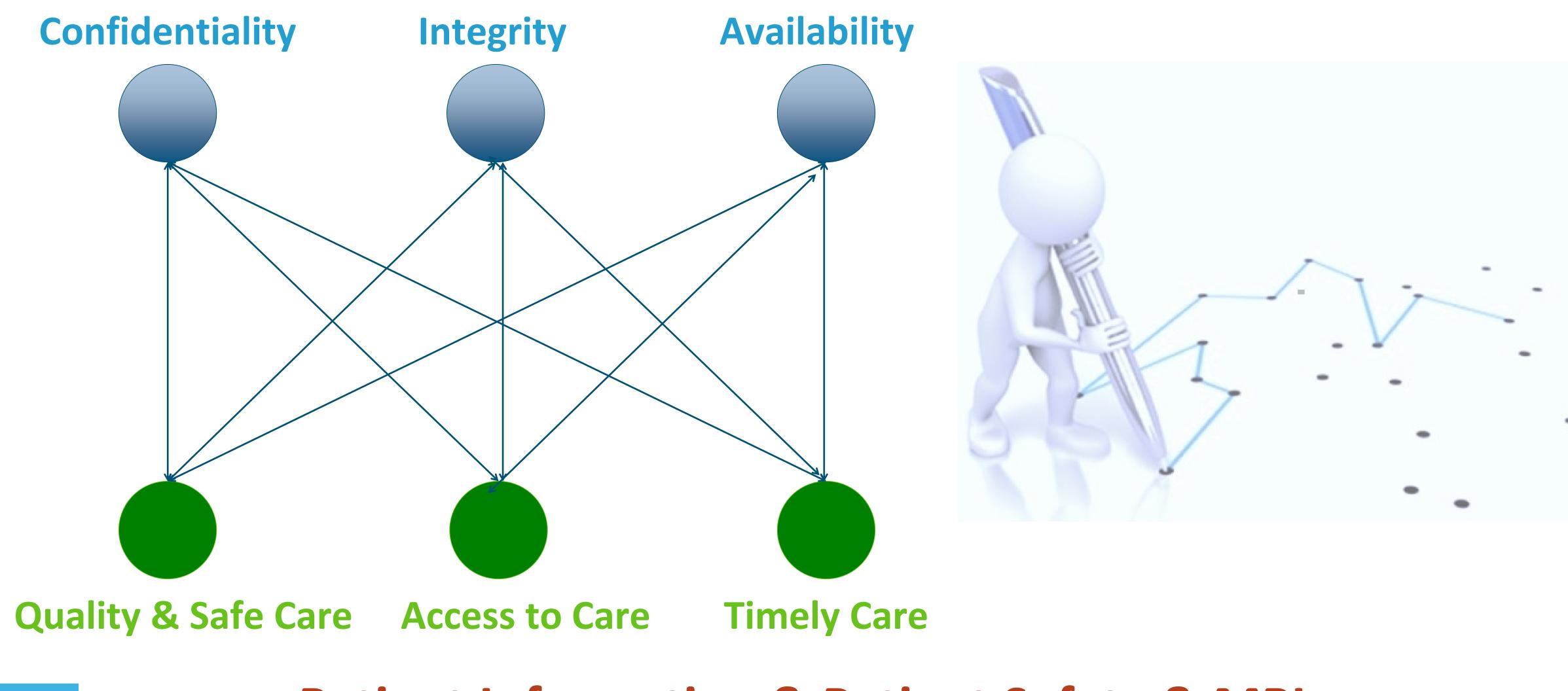
> Don't Compromise C-I-A!



ePHI, **Devices & Systems**



Connect the Dots!



Patient Information & Patient Safety & MPL









Pause and Poll

2. What is the likelihood of a cyber event triggering a patient

Greater than 20% Greater than 40% Greater than 60% Greater than 80% 100%

safety issue in your organization in the next 12 months?



A View from the Front Lines

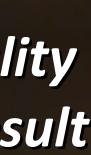




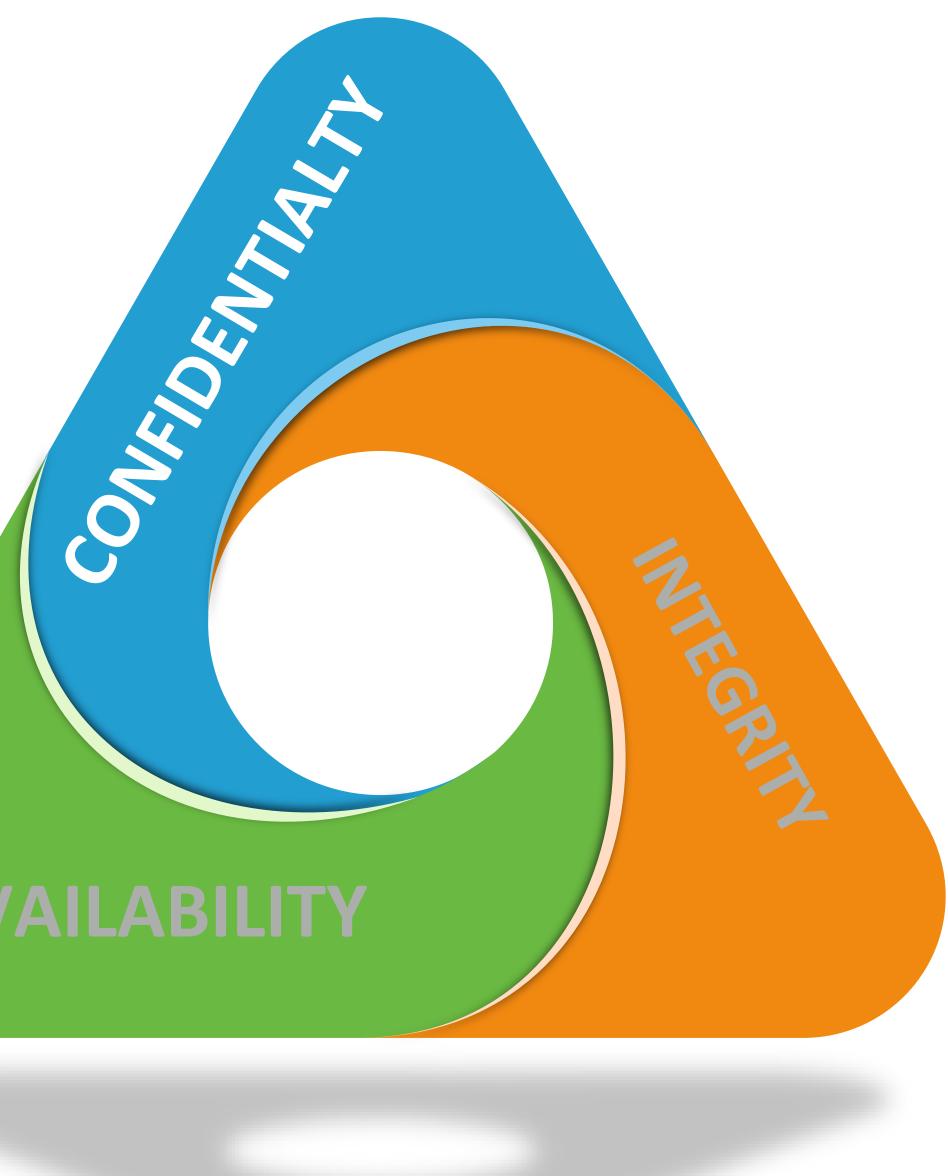
No one is going to die because of a confidentiality breach, they could however easily die as the result of an integrity or an availability cyber-attack.



Richard Staynings Chief Security Strategist Cylera Sept 18, 2019







Confidentiality

- Definition
 - assurance that information has not been disclosed to unauthorized entities
- medical records and DICOM images contain PHI
 - HIPAA
 - fines
- most medical record **breaches**
 - breaches of confidentiality
 - can embarrass or financially hurt
 - will not physically harm or kill patients

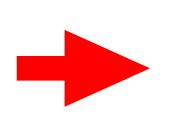


pngfly.com



- **Anthem**: healthcare insurer
 - aka Wellpoint until Aug 2014
- Feb 2015: official email from Wellpoint HQ
 - link: http://www.wellpoint.com
- when clicked on link
 - downloaded keystrokes logging malware
 - recorded typed usernames and passwords
- breach of 78 million medical records

gettyimages.com



- **phishing** email from China!!
- fake: wellpoint (wellpoint)
- real: wellpoint (wellpoint)

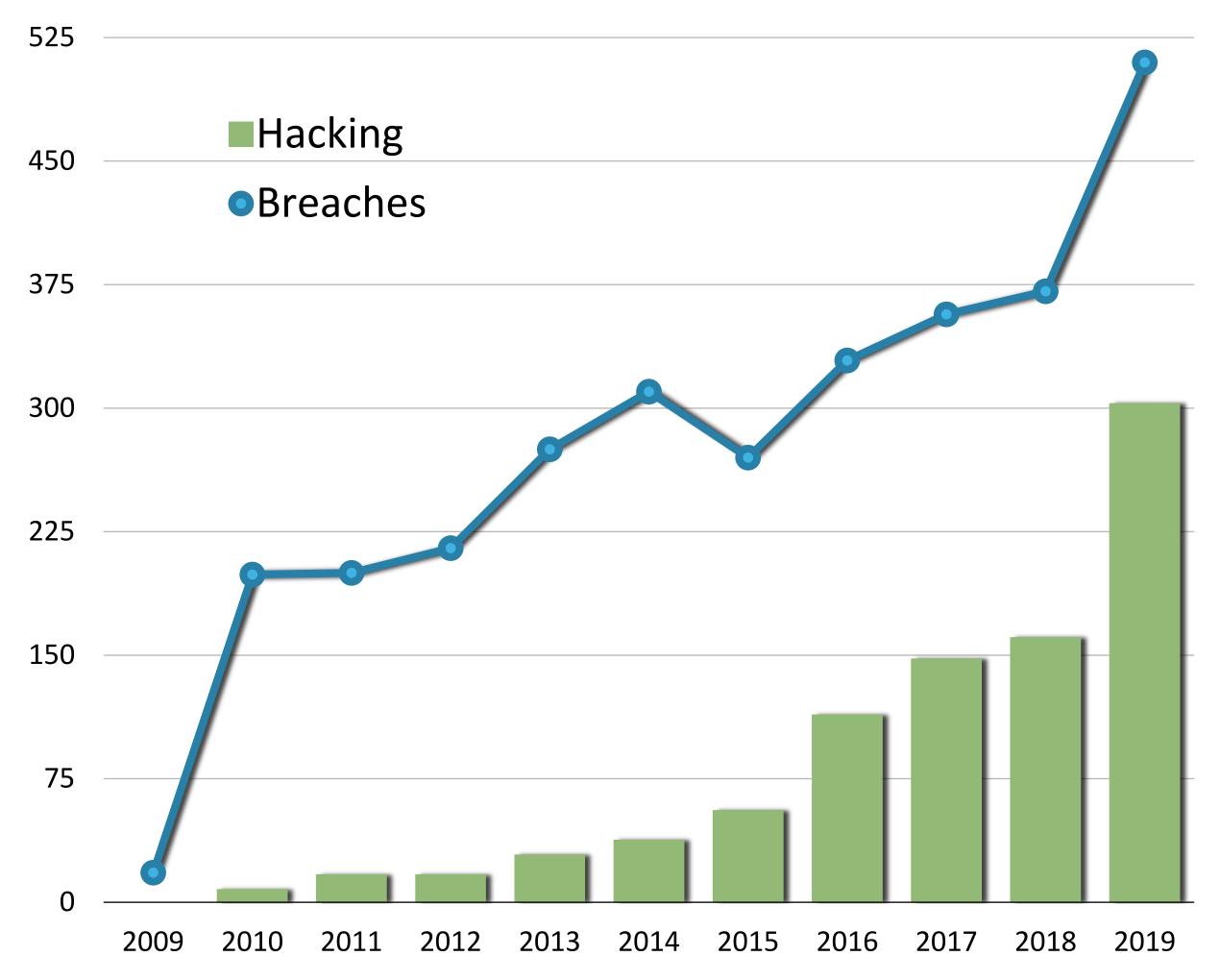
The Anthem Hack, ThreatConnect, Feb 2015, threatconnect.com/blog/the-anthem-hack-all-roads-lead-tochina/



- **3143** healthcare data breaches
 - 94% of US hospitals affected
 - 70% of US population
- **231 million** records exposed
 - spike in 2015: 113 M
 - Anthem: 78 M
 - average other years: 11 M/yr
- breaches from hacking, theft or loss
- now mostly hacking
- breaches cost \$4 billion in 2019

US health care breaches

Reported Breaches



HIPAA Journal, 2020



Largest breaches

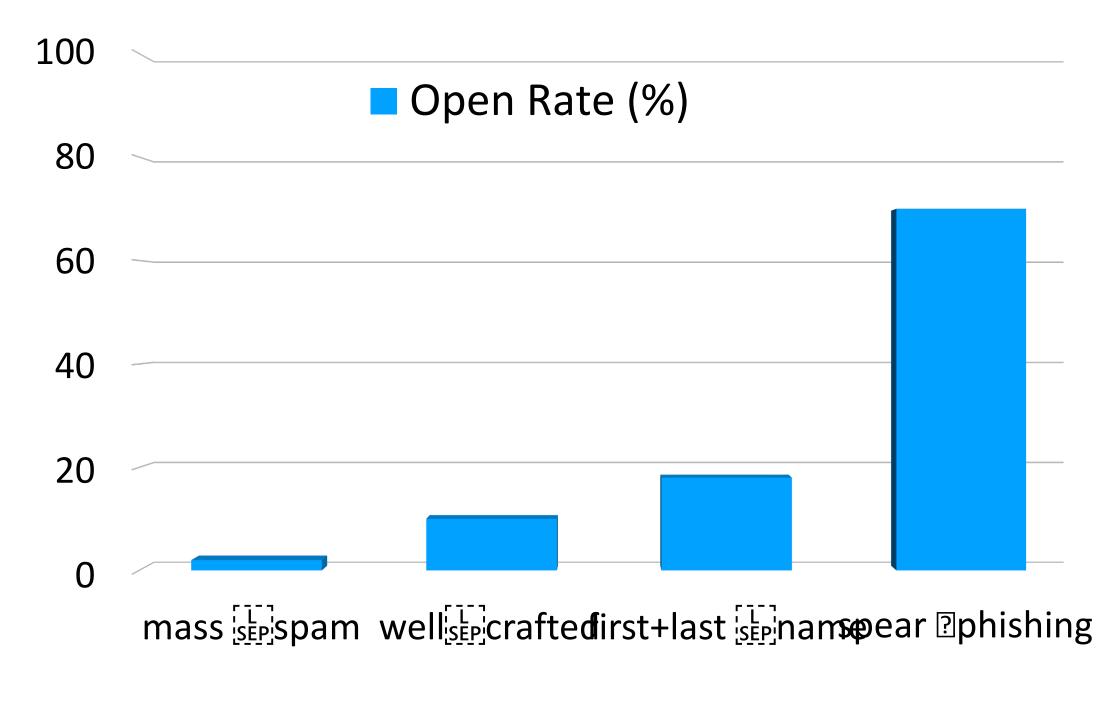
| Date | Entity | # | Cause |
|------|--|------------|-----------|
| 2015 | Anthem | 78M | Hacking < |
| 2019 | Quest Diagnostics | 12M | Hacking |
| 2015 | Premera Blue Cross | 11M | Hacking |
| 2015 | Excellus Health Plan | 10M | Hacking |
| 2019 | Lab Corp | 8M | Hacking |
| 2014 | Community Health Systems | 6M | Hacking |
| 2011 | Science Applications International Corp | 5M | Theft |
| 2014 | Community Health Systems Prof Services Corp | 4.5M | Hacking |
| 2015 | UCLA Health | 4.5M | Hacking |
| 2013 | Advocate Medical Group | 4M | Theft |



Cause of most breaches: phishing

fake emails

- induce individuals to reveal confidential information
- 23 attacks/min in 2018
- top cause of data breaches



Verizon DBIR Report, 2019

fake links

- spoofed URLs
 - www.acr.org \rightarrow
- homoglyphs
 - wellsfargo.com
 - instagram.com
 - apple.com
 - paypal.com

http://hacker.ru

| Cyrillic | Latin |
|----------|---------|
| асеорху | асеорх |
| dijlqsw | dijlqsw |

• Anthem 78M records breach in 2015

malicious file attachment

- office (38%), archive (37%), pdf (14%)
- virus or trojan
 - executes when opened by user
 - U Washington Med breach in 2013



Medical records

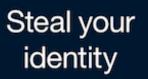


highly valuable

- - \$13K per victim to fix

With all the information in a health record, cyber criminals have many options:





Use your insurance

•



Launch targeted phishing attacks



Destroy your reputation

• comprehensive record of identity • immutable exploitable information

> 2 million victims of identity theft annually

Medical records

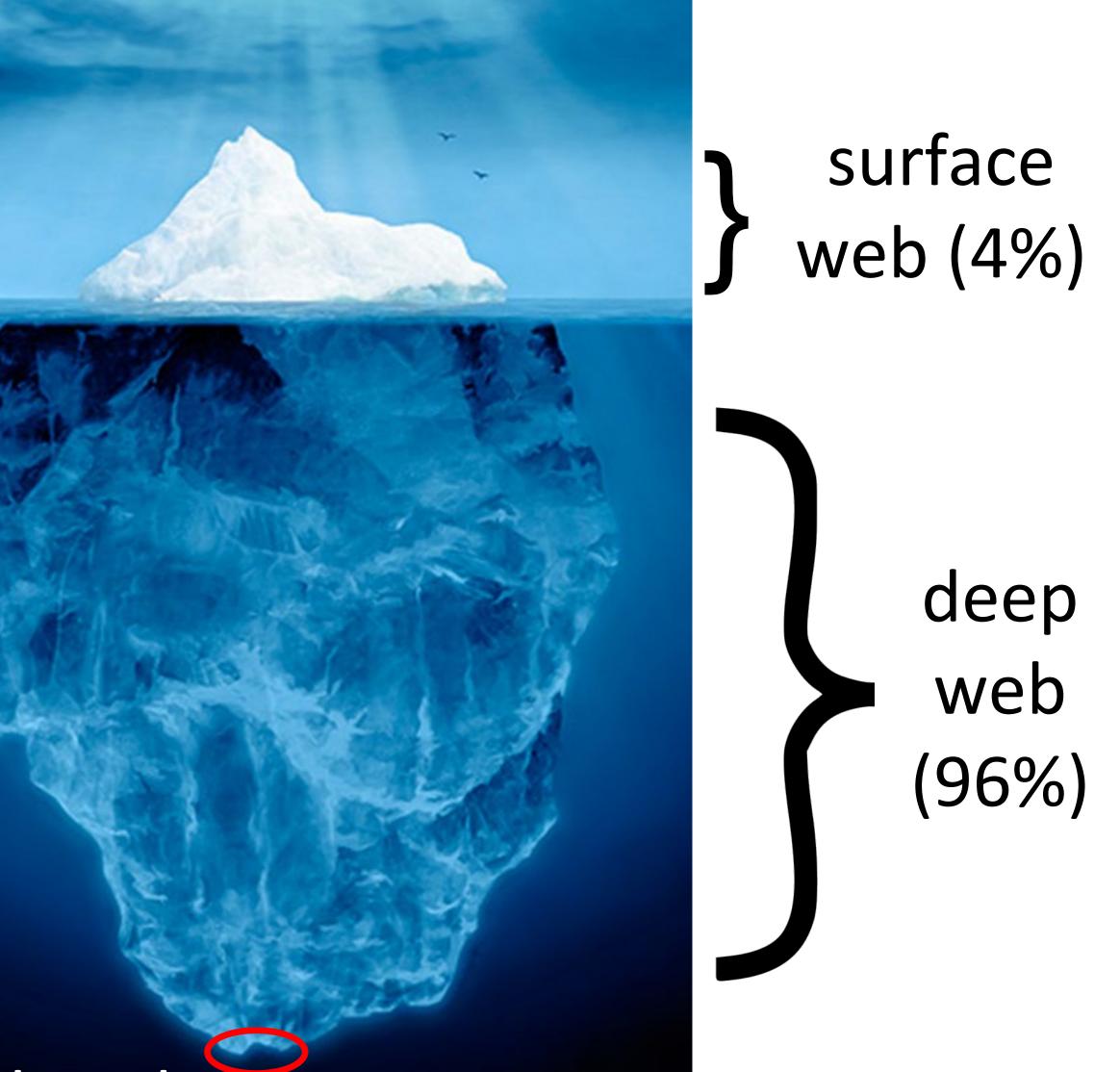
- hospitals have millions of medical records
- stored in secure data farms
- monitor hacks using threat intelligence feed
- Penn data farm
 - 6 million attacks / month
 - Brazil, China, Ukraine



Where do stolen records go?

Porn Ricin Weed Hitman Uranium Explosives Stolen SSN Powerful Drugs Fake Passports Human Trafficking **Rocket Launchers** Credit Card Numbers Fake College Degrees **Stolen Medical Records** Hacked Government Data

> 8416 active sites (< 0.005%)



dark web

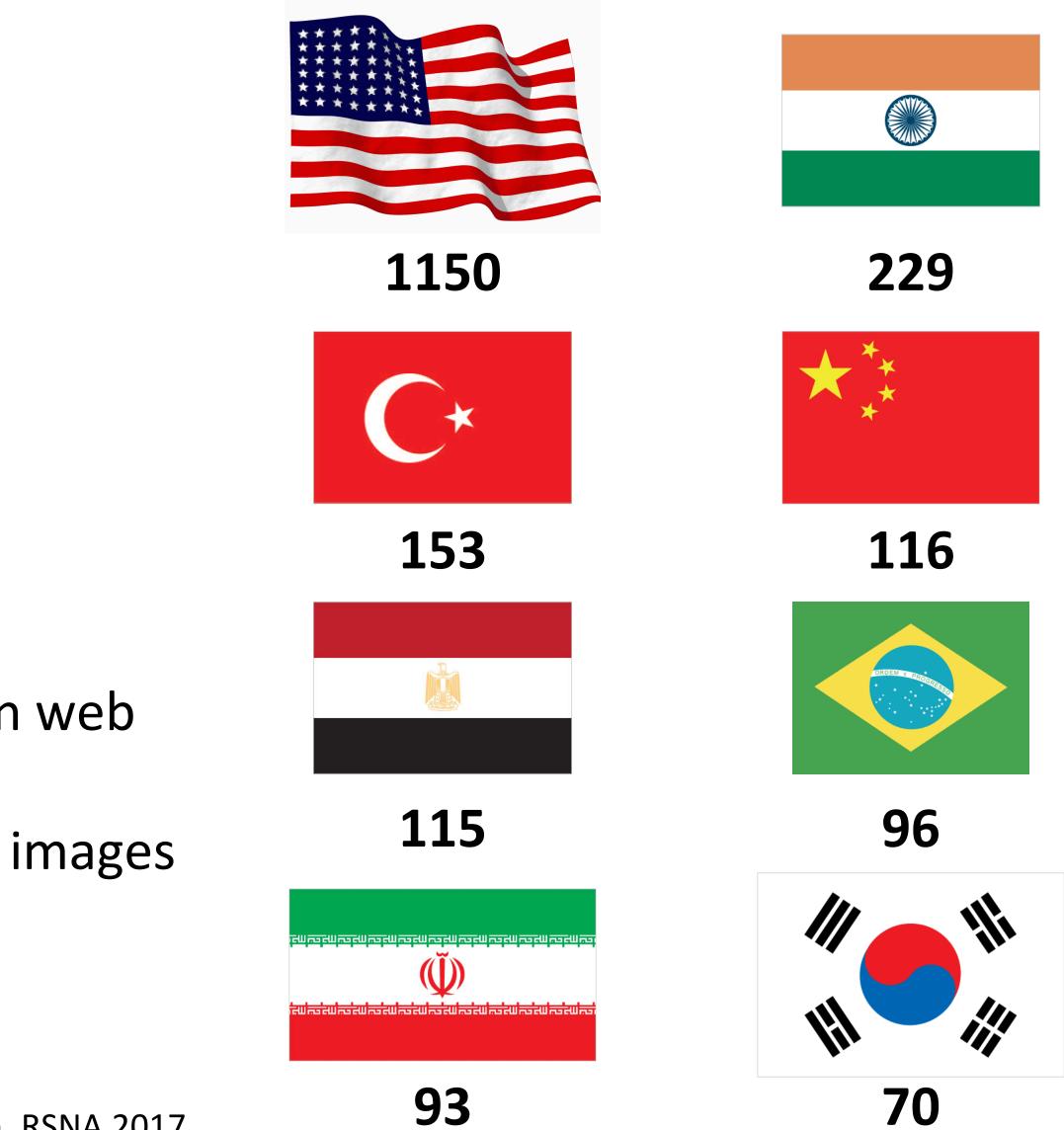
Recorded Future, 2019



Medical images can be breached too

Recent breaches

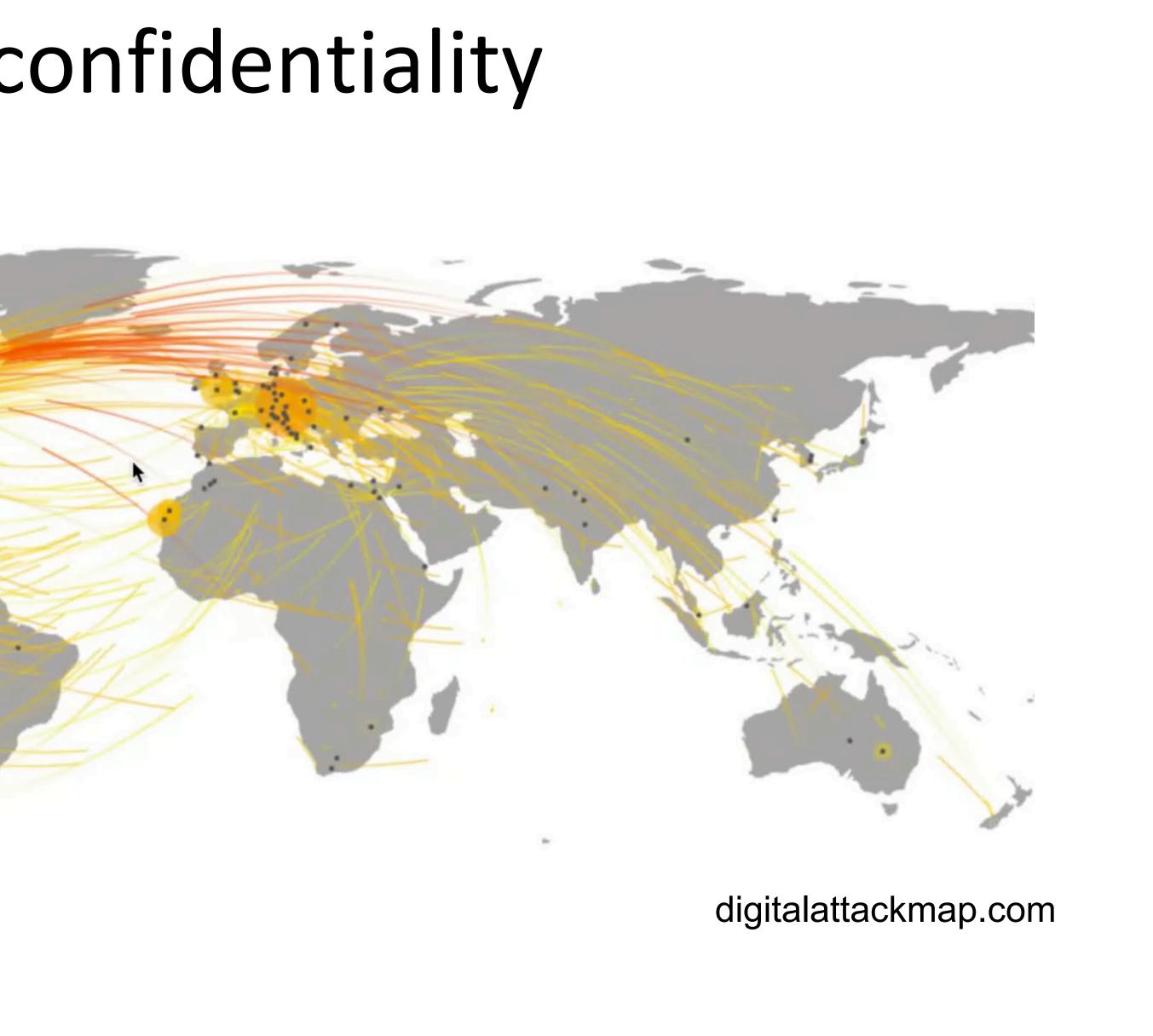
- multiple security teams
 - MGH, McAfee, Greenbone Networks
- methods
 - manual scans of internet
 - search engine (Shodan)
- results
 - many unsecured networks
 - >36,000 medical devices discoverable on web
 - 1000s of **unprotected** image servers
 - 100s of millions of unprotected medical images
 - US is biggest culprit

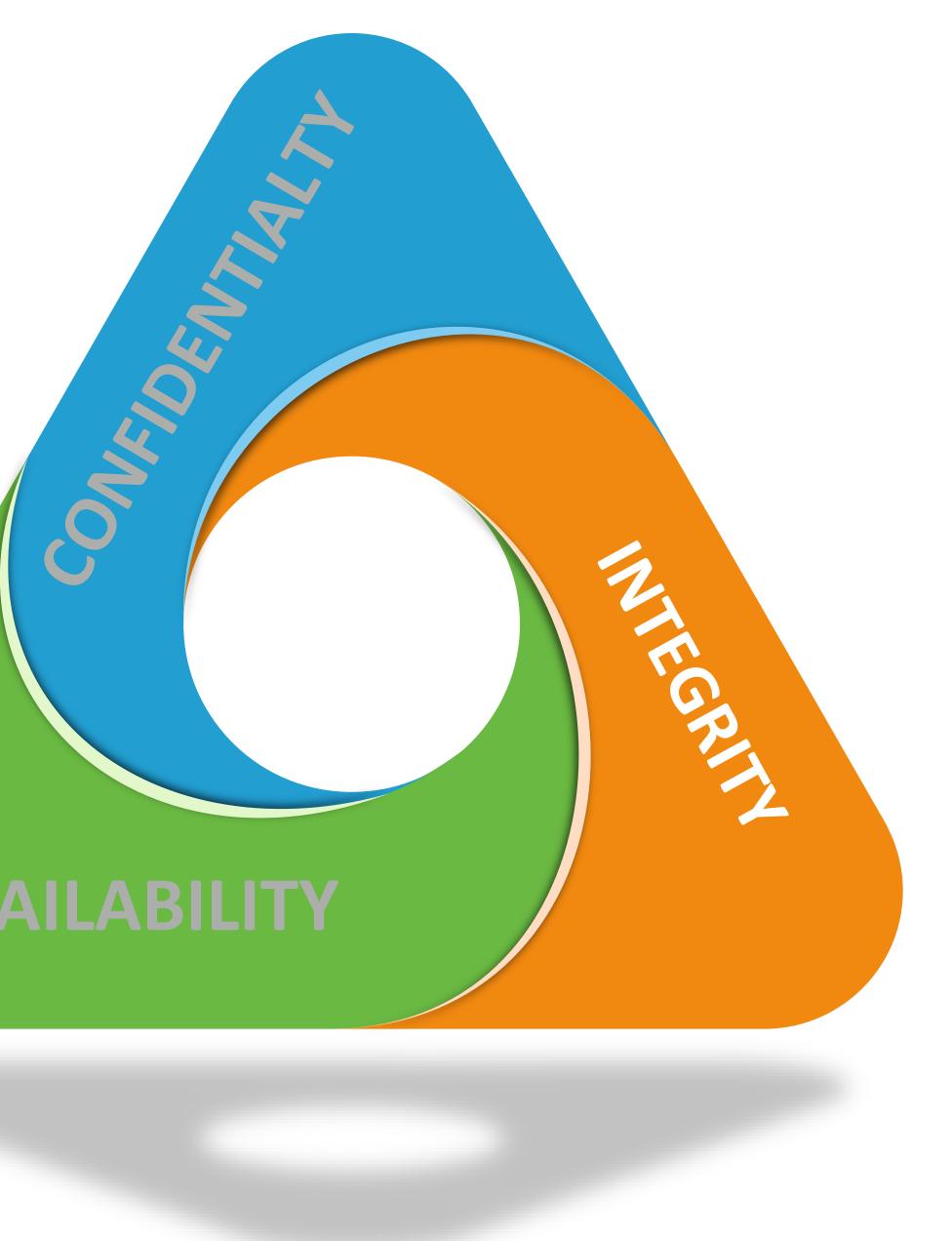


Pianykh, RSNA 2017

Breach of confidentiality

- at Penn: **250,000** outside network connection attempts blocked daily
 - vulnerability scanning
 - password spraying
 - web app testing





Integrity

Definition

- verification that data has not been altered
- **Breaches** of integrity
 - **not** obvious when they occur
 - less common but more dangerous than breaches of confidentiality
 - can affect management and could kill patients
 - e.g. breach that modifies lab results or imaging results

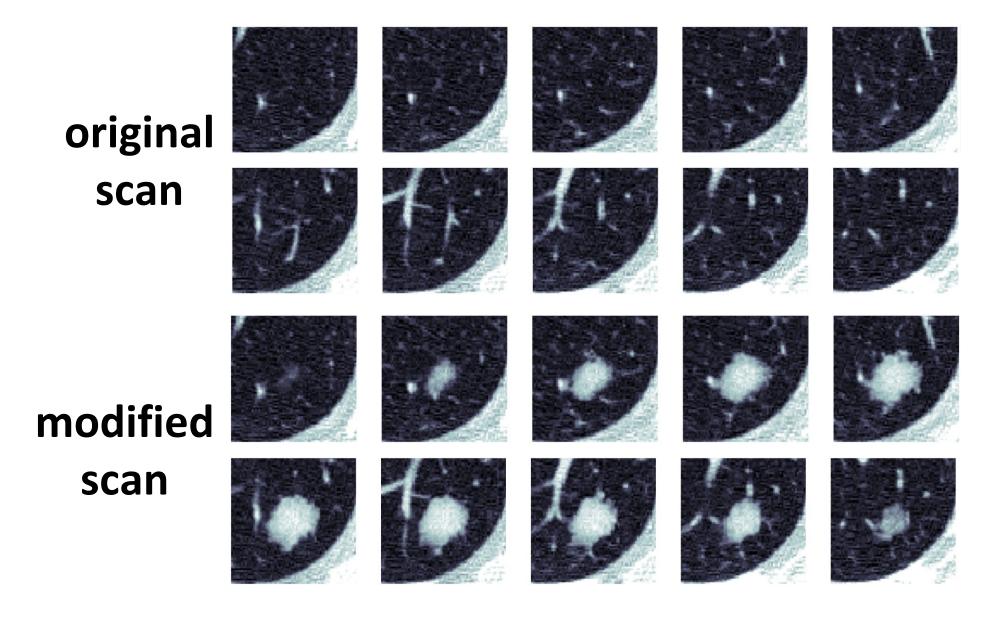


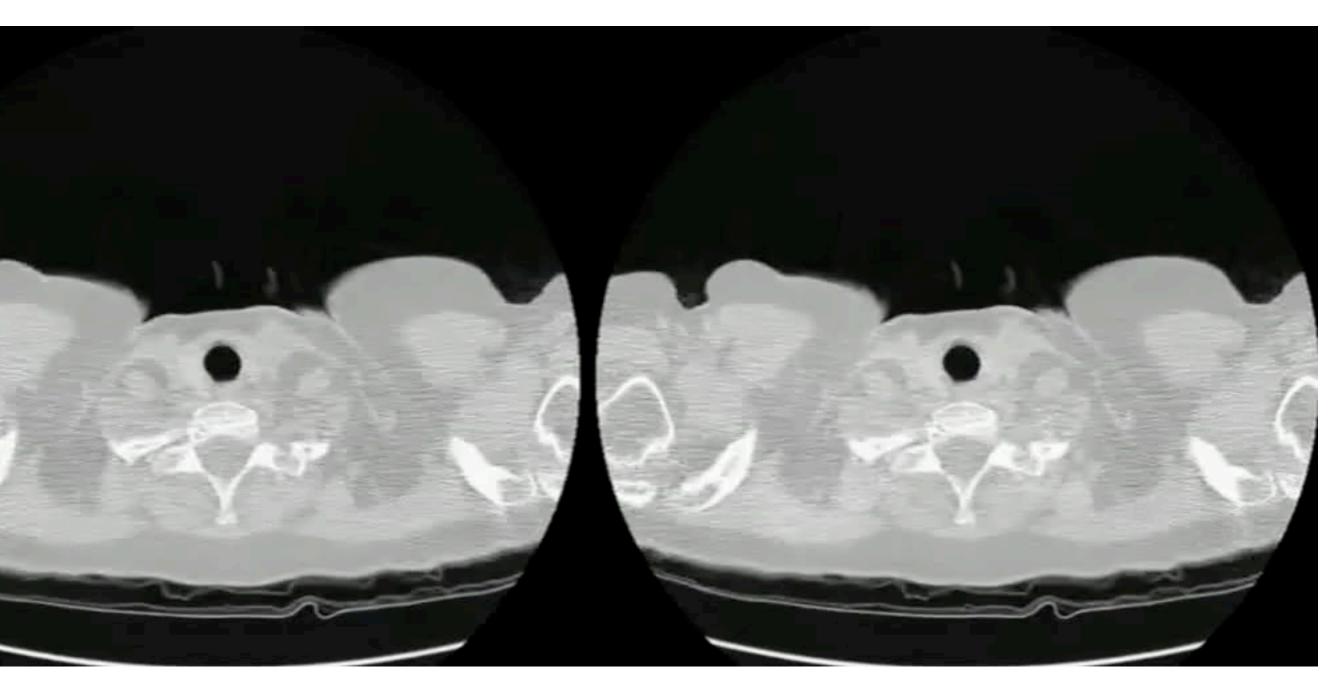
Avengers: Infinity War

Breach of integrity: images

hacking medical images

- intercept images on network between scanner and PACS
- add or remove nodules on CT images using deep-learning





original

fake nodules

radiologists fooled by:

- added fake nodules (99%)
- removed nodules (94%)

Mirsky, arXiv:1901.03597v2, Apr 2019



Breach of integrity: images

- modified medical images **DICOM** files
- header (preamble)
 - used for dual personality files
 - e.g. DICOM-TIFF
 - replaced by executable file header
- private fields
 - replaced by malware

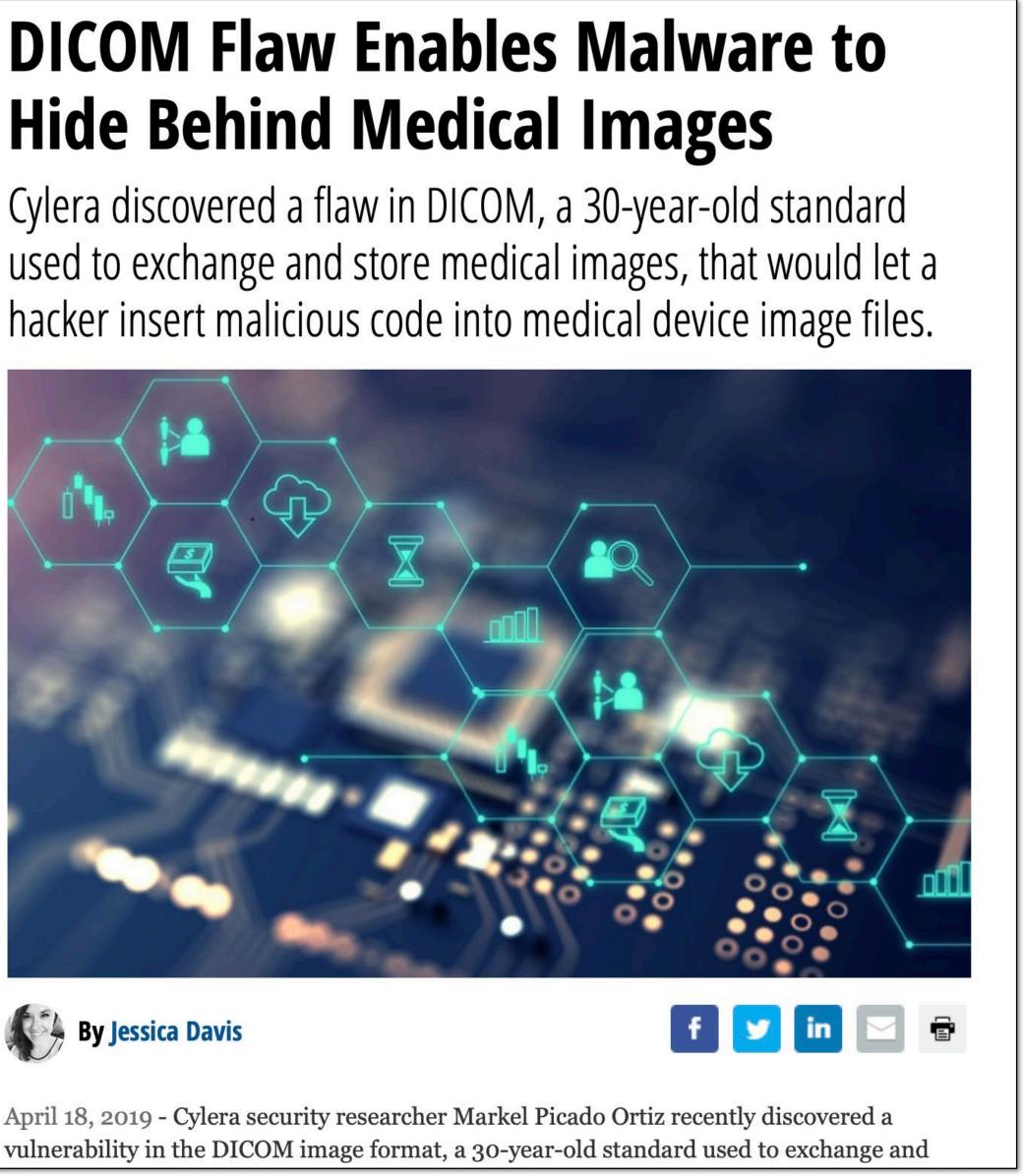
Picado Ortiz, Apr 2019, labs.cylera.com/2019/04/16/pe-dicommedical-malware/

| 8,0030)Study time12:00:008,0033)Image time12:01:130,0020)Patient ID12345670,0040)Patient's sexM0,1010)Patient's age56y8,0015)Body partChest8,0060)kVp100 | | dified head | der |
|--|--|--|---|
| 8,0030)Study time12:00:008,0033)Image time12:01:130,0020)Patient ID12345670,0040)Patient's sexM0,1010)Patient's age56y8,0015)Body partChest8,0060)kVp100 | | DICM | |
| 8,0011) Columns 2800 | (0008,0020) (0008,0030) (0008,0033) (0010,0020) (0010,0040) (0010,1010) (0018,0015) (0018,0060) (0028,0010) (0028,0011) | Study time Image time Patient ID Patient's sex Patient's age Body part kVp Rows | 12:00:00 12:01:13 1234567 M 56y Chest 100 2800 |
| | | | S |
| malware in private fields | 0 | | 1 |
| | A | | K |
| | n/> | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |

PE-DICOM file



DICOM Flaw Enables Malware to Hide Behind Medical Images







April 18, 2019 - Cylera security researcher Markel Picado Ortiz recently discovered a

Breach of integrity: HL7

data transmission protocol for clinical workflows lack of authentication and encryption

```
PID|||99||TTT^BT|||U|
ORC | RE |
OBX|1|ST|pH||7.12||7.350-7.450|L|||F||20150528093432|||^^07143^RAPIDPoint 405|20150528093432|
OBX|2|ST|pCO2||27|mmHg|35.0-45.0|||F|
OBX|3|ST|pO2||77|mmHg|75.0-100.0|H|||F|
OBX|4|ST|tHb||21.5|g/dL|12.0-18.0|H|||F|
OBX|5|ST|O2Hb||97.0|%|94.0-97.0|||F|
OBX | 6 | ST | COHb | | 0.4 | % | 0.5-1.5 | L | | | F |
```

vulnerable to interception of data on networks proof of concept at Black Hat 2018 (ARP spoofing)

- inject false information
- disrupt care
- serious patient harm

MSH|^~\&|Rapidcomm |Hospital|OpenEMR|Hospital|20180719164041||ORU^R01|0C0AGPD228ZGM001D808|P|2.4|||AL|AL|

Dameff, Black Hat 2018





Medical devices

15 million medical devices in U.S.

- from tiny pill-size devices
- to large stationary MRI scanners

typical hospital

- patient care dependent on technology
 - devices per ICU bed: 13
- thousands of medical devices
 - many devices **networked**
 - many legacy devices
 - can be in use for many years
 - not cyber-security oriented



Proven attacks on generic devices

- muting alarms
- activating false alarms
- manipulate display data
- restoring system
- ransomware
- patient to image disruption
- mechanical disruption of motors
- disruption of results
- alteration of results
- leakage of PI
- denial of service



Nissim, RSNA 2017



New York Times, March 2008

- team from U Wash and U Mass
- Medtronic's Maximo pacemaker/ICD
- hacked the device in a lab

McAfee FOCUS 2011 (Jack):

- wireless hack of insulin pumps
- repeatedly deliver maximum dose
- until reservoir depleted

BreakPoint Oct 2012 (Jack):

- assassinate victim from 50ft away
- wireless hack of pacemaker/ICD
- to deliver 830 volts shock

Black Hat 2018 (Rios and Butts):

- put malware on **pacemaker**
- wireless hack of insulin pumps (app in Jul 2019)

Barnaby Jack (RIP)



Dick Cheney

- US Vice-President 2001-2009
- had wireless functions of pacemaker/ICD disabled in 2007
- even before NY Times article



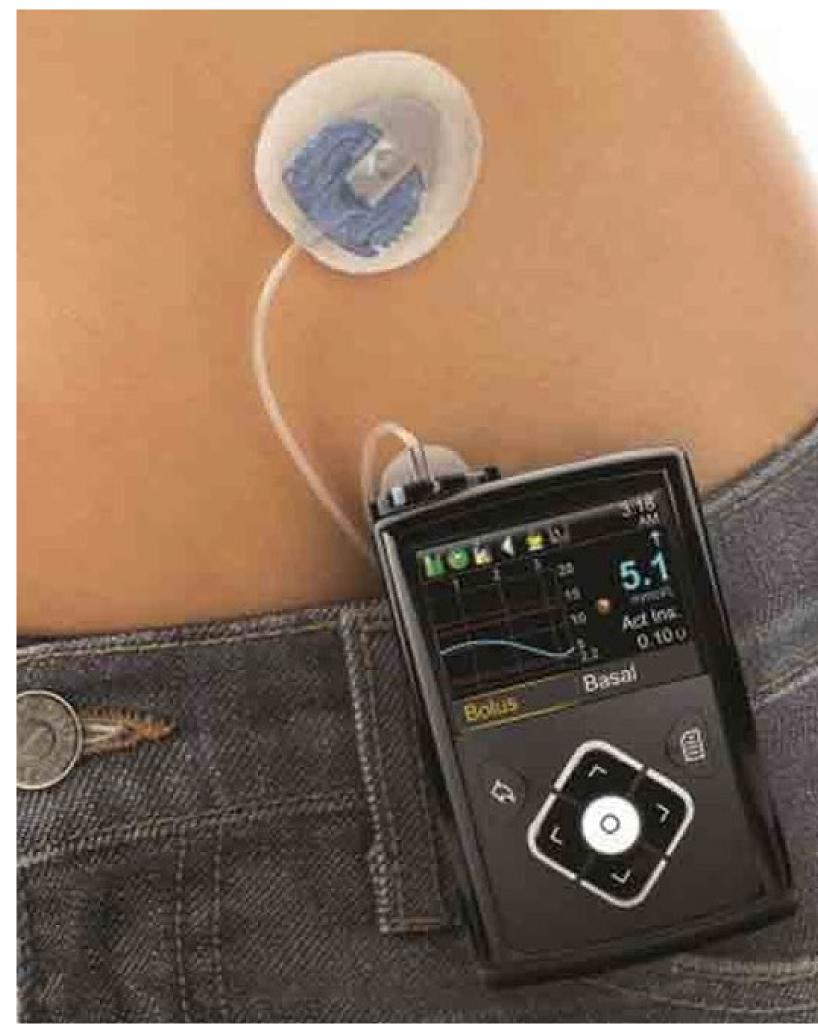
Cheney, 60 minutes, Oct 2013

William Walden

- US Vice-President on TV 2011-2012
- *Homeland: Broken Hearts* episode
- terrorists accelerate heart rate on pacemaker, killing him



- need to keep perspective here
- medical records
 - long history of breaches and thefts
 - records need protection
- medical devices
 - vulnerable, can be hacked
 - hacks are often proofs of concept
 - a hacker could hack them to harm patients
 - possible but unlikely
 - malware could randomly reach a device and cause havoc
 - has happened
 - devices need protection





AVAILABILITY



- Definition
 - guarantee of reliable access to information by authorized people
- Breaches of availability
 - very obvious when they occur
 - can harm patients
 - e.g. if surgeon loses access to patient's medical record before or during surgery, can harm patient

Availability



Breach of availability

| Time Left Akso, if you don't pay in 7 days, you won't be able to recover your mes rorever. How Do I Pay? About bitcoin How to buy bitcoins? Contact Us Check Payment Decrypt | ★ Wanna Decryptor 1.0 Image: Constraint of the state of | Can I Recover My Files? Sure. We guarantee that you can recover all your files safely and easily. (But you have not so enough time.) You can try to decrypt some of your files for free. Try now by clicking <decrypt>.</decrypt> If you want to decrypt all your files, you need to pay. You only have 3 days to submit the payment. After that the price will be doubled. |
|--|---|---|
| | Time Left Image: Signal Sign | Also, if you don't pay in 7 days, you won't be able to recover your files forever. How Do I Pay? Send \$300 worth of bitcoin to this address: ACCEPTED HERE Send \$200 worth of bitcoin to this address: Copy |

May 2017 - Wannacry

Wannacry ransomware

Windows ransomware cryptoworm • EternalBlue

- exploits SMB vulnerability
- gets access + spreads
- **Double**Pulsar
 - loads malware

discovery of kill switch stopped it (for \$10) http://www.iuqerfsodp9ifjaposdfjhgosurijfaewrwergwea.com

spread over 4 days: 12-15 May 2017

- > 200,000 computers in 150 countries
 - universities, hospitals, governments, police, transportation, telecom, banks
 - England NHS affected +++
- damages: \$4-8 billion

HUGE wake-up call for cybersecurity in healthcare!

McNeil, Malwarebytes, 2017 Symantec, 2017



Brookside ENT and Hearing Center

- medical practice in Michigan
- Apr 2019: **ransomware** attack
 - encrypted all medical records
 - \$6500 ransom
- FBI advised **not** to pay ransom
 - doctors did not pay

bronsonhealth.com

- hackers deleted all medical records
- impossible to recover records
- doctors decided to shut down clinic and retire

Glaser, Newschannel 3, March 2019, wwmt.com/news/local/west-michigan-doctors-office-hackeddoctors-held-for-ransom



Breach of availability

denial of service (DoS, DDoS)

- send millions of DICOM messages to overwhelm DICOM server
- leads to denial of service
- DICOM server becomes too busy to perform basic tasks

Boston Children's Hospital (Apr 2014)

- malware on 40,000 routers
 - controlled by hacker
- flooded 65,000 IP adresses
- blocked online access for 2 weeks

Hacker Gets 10 Years for DDoS Attack on Children's Hospitals

Martin Gottesfeld hacked into the Boston Children's Hospital IT system in protest of the treatment of a patient, Justina Pelletier.



Followers of the hacker group Anonymous were known to wear Guy Fawkes masks to show their support for the protest.

④ January 15, 2019 ▲ Katie Malafronte ● Jump to Comments



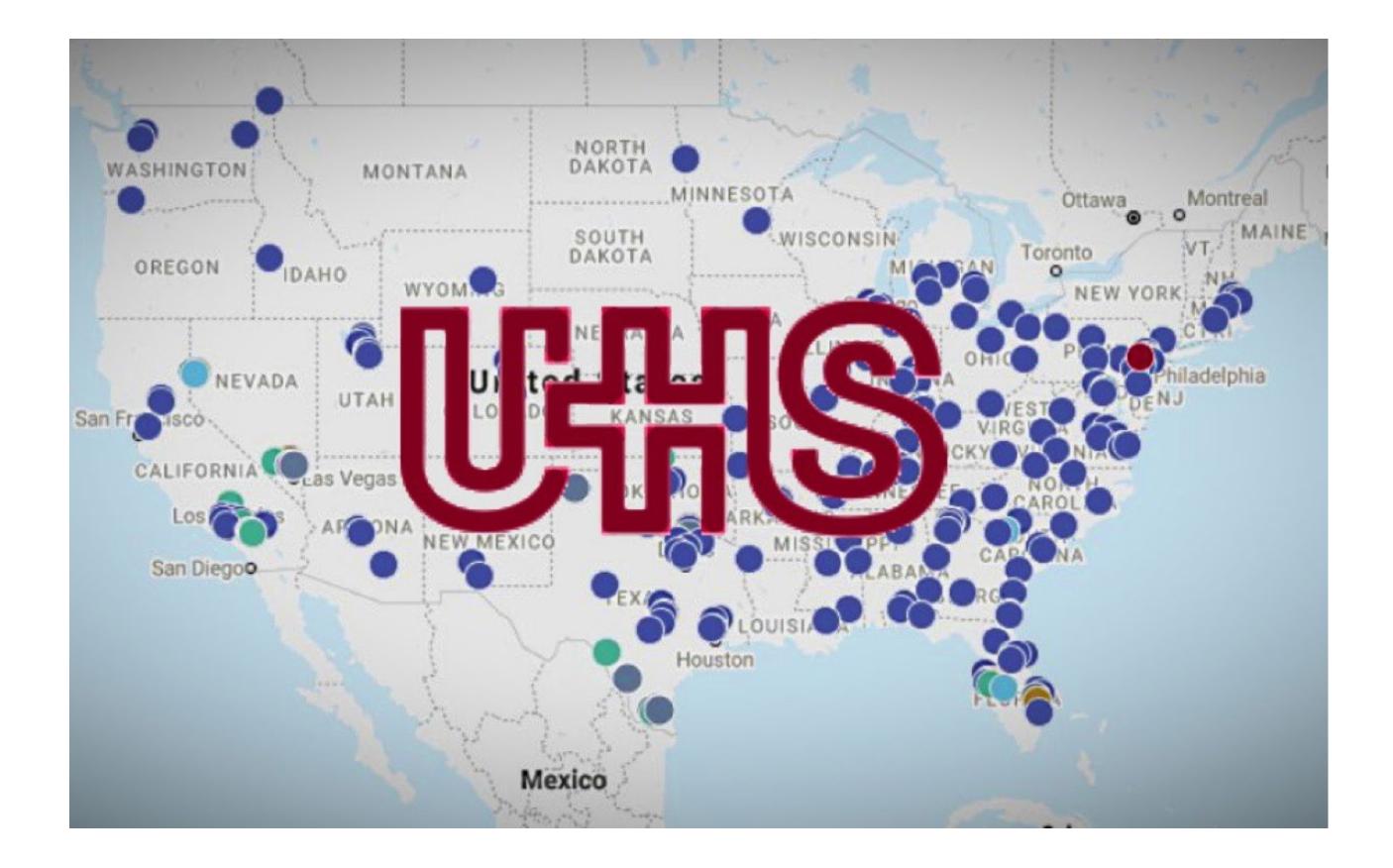
Breach of availability

- three weeks ago, Düsseldorf, Germany
- ransomware attack
 - against Heinrich Heine University
 - affected affiliated University Hospital
 - encrypted about 30 hospital servers
- woman suffered critical medical condition
 - went to that ER for treatment
 - turned away from hospital
 - rushed to a hospital 20 miles away
 - one-hour delay in treatment
 - woman **died**



UHS massive attack

- Two weeks ago, across USA
- Universal Health Services (UHS)
 - 400+ healthcare facilities US and UK
- ransomware attack (Ryuk)
 - lost access to computers and phones
 - labs, ekg's, radiology studies
 - no access to PACS system
 - redirecting ambulances
 - relocating patients
- four deaths reported??
 - caused by delays in lab results
 - unclear if related to attack



Discussion and Q&A



Pause and Poll

3. This session helped me better understand the unintended healthcare system:

Strongly Agree Agree **Not Sure** Disagree **Strongly Disagree**

potential for patient harm due to the digitization of our



Upcoming Clearwater Education

The Rise of **Telehealth:** Planning for the Future EALTHCARE CYBER RISK MANAGEMENT

MIKAELA LEWIS, MSHCPM Consultant, Clearwater

TRAPPER BROWN, CASP Consultant, Clearwater

WEBINAR Thursday, October 15 11am - 12pm CT





IRM Analysis[®]

ENTERPRISE CYBER RISK MANAGEMENT SOFTWARE

LIVE DEMONSTRATION Tuesday, Oct 27 @11am CT



See how an OCR-Quality® Risk Analysis is done.

Learn more and register at https://clearwatercompliance.com/upcoming-educational-events/



0 STOP HECYBER **BLEEDING**

What Healthcare Executives and Board Members Must Know About **Enterprise Cyber Risk Management** (ECRM)

> HOW TO SAVE YOUR PATIENTS, PRESERVE YOUR REPUTATION, AND PROTECT YOUR BALANCE SHEET

BOB CHAPUT

INTERESTED IN A COPY?

https://www.clearwatercompliance.com

/stopthecyberbleeding



Thank You & Questions



Bob Chaput bob.chaput@clearwatercompliance.com



Benoit Desjardins benoitd@upenn.edu



Thank you for completing the short survey when you leave the session. We appreciate and use your feedback.



www.ClearwaterCompliance.com 800.704.3394 LinkedIn | <u>linkedin.com/company/clearwater-compliance-llc/</u> Twitter | @clearwaterhipaa

