HIPAA Assessment

Prepared For:

SEFHO

Prepared By:

GiaSpace

GiaSpace

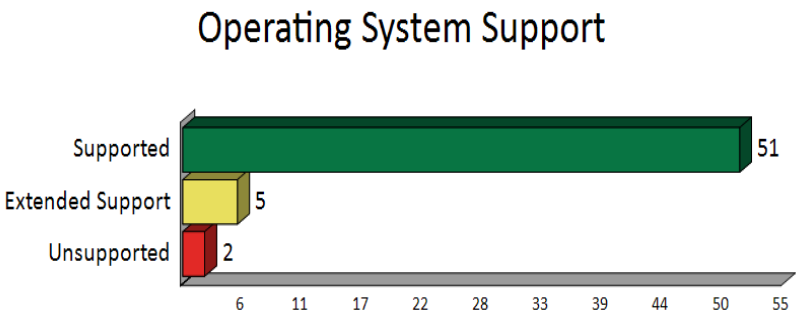
Agenda

- Environment
- Assessment Overview
- Risk and Issue Score
- Issue Review
- Next Steps

Environment

NETWORK ASSESSMENT (changes)	
Domain Controllers	2
Number of Organizational Units	20
Users	
# Enabled	59
Last Login within 30 days	23
Last Login older than 30 days	36
# Disabled	39
Last Login within 30 days	1
Last Login older than 30 days	38
Security Group	
Groups with Users	50
# Total Groups	106
Computers in Domain	
Total Computers	88
Last Login within 30 days	58
Last Login older than 30 days	30

	# Enabled Users	# Disabled Users
Employee - ePHI authorization	111	0
Employee - no ePHI authorization	2	0
Vendor - ePHI authorization	0	0
Vendor - no ePHI authorization	1	0
Former Employee	5	0
Former Vendor	3	0



Assessment Overview

The following areas were assessed. Potential issues were found in the areas highlighted in **RED**.

Environment
-Facility Access Controls

Users
-Information System Activity Review
-Termination Procedures
-Access Authorization
-Existing Seurity Measures Related to Access Controls
-Password Management
-Administrative Access Control
-Audit Controls
-Person or Entity Authentication

Wireless
-Access Authorization
-Access Establishment
-Workforce Security

Servers and Local Computers
-Protection Against Malicious Software
-Applications and Data Criticality Analysis
-Business Associate Agreements

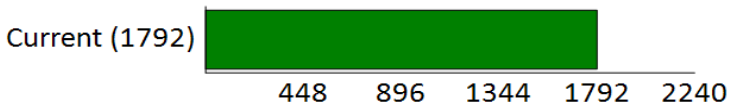
Firewall
-Access Authorization
-Protection Against Malicious Software

Email
-Applications and Data Criticality Analysis

Risk and Issue Score

Current Risk Score

Current Issue Score



Issue Review

Unsupported Operating Systems (97 pts)

Issue: 2 computers were found using an operating system that is no longer supported. Unsupported operating systems no longer receive vital security patches and present an inherent risk.

Recommendation: Upgrade or replace computers with operating systems that are no longer supported.

Issue Review

User has not logged in in 30 days (13 pts)

Issue: Users that have not logged in in 30 days could be from a former employee or vendor and should be disabled or removed.

Recommendation: Disable or remove user accounts for users that have not logged in in 30 days.

Issue Review

User password set to never expire (80 pts)

Issue: User accounts with passwords set to never expire present a risk of use by authorized users. They are more easily compromised than passwords that are routinely changed.

Recommendation: Investigate all accounts with passwords set to never expire and configure them to expire regularly.

Issue Review

Non-administrative generic logons have access to Network Share on system with ePHI (85 pts)

Issue: Generic accounts which could be in use by multiple people cannot be properly restricted and should not have access to network shares with ePHI.

Recommendation: Remove access to Network Shares on systems with ePHI.

Issue Review

Automatic screen lock not turned on. (94 pts)

Issue: Automatic screen lock prevents unauthorized access when users leave their computers. Having no screen lock enable allows authorized access to network resources.

Recommendation: Enable automatic screen lock on the following computers: BO-SANDBOX, CONFERENCE_ROOM, DC03, DEVKASEYA, DEVTFS, DEV_2012-CORE, Ehammond-WIN7, FILE2012-1, HV01, HV02, HV03, jacob-WIN8, KjacobsASUSPC, MARKETING-1, Mmayhemon-HP, Mwest-WIN864, PITmarcus-PC, Psimpson-PC, Psimpson-WIN764, REX, SQL2012-01, Thayden-DT

Issue Review

Computer with ePHI does not have object level auditing on (11 pts)

Issue: Object level auditing helps identify users who have accessed files and other system resources. Object level auditing may impose an unacceptable performance impact and should be considered for use on high risk computers or environments.

Recommendation: Evaluate the pros and cons of enabling object level access or ensure alternative methods for breach identification are in place.

Issue Review

Passwords less than 6 characters allowed (75 pts)

Issue: Passwords are not required to be 6 or more characters, allowing users to pick extremely short passwords which are vulnerable to brute force attacks.

Recommendation: Enable enforcement of password length to 6 more characters.

Issue Review

Audit user login in not turned on (30 pts)

Issue: Login auditing is required for proper identification of access to computers and resources. In the event of a breach, audit logs can be used to identify unauthorized access and the severity of the breach.

Recommendation: Enable user login auditing.

Issue Review

Anti-virus not installed (94 pts)

Issue: Malware protection is required but not identified as being installed on computers in the network.

Recommendation: Install a commercial grade anti-virus program on the computers indicated in the Endpoint Security section of the Evidence of HIPAA Compliance report.

Issue Review

Anti-virus not turned on (92 pts)

Issue: Malware protection is required but not identified as being enabled on computers in the network.

Recommendation: Enable anti-virus program on the computers indicated in the Endpoint Security section of the Evidence of HIPAA Compliance report.

Issue Review

Anti-spyware not installed (94 pts)

Issue: Malware protection is required but not identified as being installed on computers in the network.

Recommendation: Install a commercial grade anti-spyware program on the computers indicated in the Endpoint Security section of the Evidence of HIPAA Compliance report.

Issue Review

Anti-spyware not turned on (92 pts)

Issue: Malware protection is required but not identified as being enabled on computers in the network.

Recommendation: Enable anti-spyware program on the computers indicated in the Endpoint Security section of the Evidence of HIPAA Compliance report.

Issue Review

Anti-spyware not up to date (90 pts)

Issue: Out-of-date definitions may not properly protect a computer from attacks by malicious software.

Recommendation: Ensure anti-spyware programs on the computers indicated in the Endpoint Security section of the Evidence of HIPAA Compliance report are up-to-date.

Issue Review

USB drives detected in use (unencrypted) (75 pts)

Issue: Theft is the most common form of data breach. Unencrypted USB drives in an environment with ePHI may allow data loss through theft.

Recommendation: Eliminate the use of unencrypted USB drives.

Issue Review

USB drives detected in use (50 pts)

Issue: The use of USB drives increase the change of data loss through theft and should be discouraged to the extent possible.

Recommendation: Reduce or eliminate the use of USB drives in the environment.

Issue Review

Workstations with ePHI not backed up (78 pts)

Issue: Security Center reports that computers identified as having ePHI are not backed up.

Recommendation: Ensure that data is properly backed up on computers with ePHI. See the Endpoint Security section of the Evidence of HIPAA Compliance for a list of computers.

Issue Review

Inconsistent password policy / Exceptions to password policy (68 pts)
Issue: Password policies are not consistently applied from one computer to the next. A consistent password policy ensure adherence to password best practices.
Recommendation: Eliminate inconsistencies and exceptions to the password policy.

Issue Review

Potential free hosted web-based email solution in use (93 pts)
Issue: The use of free hosted web-based email may allow transmission of ePHI outside of the company through entities that you may not have a signed Business Associate agreement.
Recommendation: Identify the necessity of using the free hosted email services and discontinue their use.

Issue Review

Company WiFi open or using insecure security (i.e., WEP) (94 pts)
Issue: Open or insecure WiFi protocols may allow an attacker access to the company's network and resources.
Recommendation: Enabled WiFi security and use a more secure protocols such as WPA2.

Issue Review

Terminated employee account enabled (96 pts)

Issue: One or more accounts are still enabled for terminated employees. This poses a risk of unauthorized access.

Recommendation: Disable accounts for all terminated employees.

Issue Review

Terminated vendor account enabled (96 pts)

Issue: One or more accounts are still enabled for terminated vendors. This poses a risk of unauthorized access.

Recommendation: Disable accounts for all terminated vendors.

Issue Review

User not logged in in 90 days (not terminated) (25 pts)

Issue: Inactive user accounts were found that could potentially indicate terminated employees or vendors.

Recommendation: Investigate all inactive accounts and disable accounts from terminated employees and vendors.

Issue Review

Unrestricted network share with ePHI (80 pts)

Issue: Network shares containing ePHI were found as completely unrestricted (granting access to 'Everyone').

Recommendation: Investigate the network shares containing ePHI with unrestricted access. Limit access to the minimum necessary.

Issue Review

LOTS of Security patches missing on computers with ePHI (90 pts)

Issue: Security patches are missing on computers designated as having ePHI. Maintaining proper security patch levels is required by HIPAA to prevent unauthorized access and the spread of malicious software. Lots is defined as missing 3 or more patches and may be an indicator of issues with the patching system.

Recommendation: Address patching on computers with missing security patches.

Next Steps

- Agree on List of Issues to Resolve
- Present Project Estimates and Costs
- Establish Timelines
- Set Milestones
- Get Signoff to Begin Work