SECURITY RISK ASSESSMENT TOOL | V3 The Office of the National Coordinator for Health Information Technology

U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES OFFICE FOR CIVIL RIGHTS

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SOLUTIONS TO ADVANCE HEALTH

Agenda



Part one: SRA Tool Overview

- The Challenge and Solution
- SRA Tool Basics
- Tracking Vendors and Assets
- Completing the Assessment
- Understanding the Reports and Results

Part two: Technical Assistance

- Questions & Answers
- Call for feedback

Challenge

The healthcare industry faces constantly evolving cybersecurity threats and smaller healthcare providers often have limited time and resources to defend against the growing number of security risks.

The healthcare industry needs a Security Risk Assessment (SRA) tool that is easy to use and can help small practices evaluate their security posture against increasingly sophisticated security attacks.



Solution

ONC engaged Altarum to design an improved version of the SRA Tool with a wizard-based workflow, updated layout, and an enhanced user experience that can assist users with their risk analysis process.

The new SRA Tool has over 56,645 downloads in the past year.

Overview



The Security Risk Assessment (SRA) Tool guides users through security risk assessment process. It includes a self-paced modular workflow which includes a series of questions based on standards identified in the HIPAA Security Rule. Responses are sorted into Areas of Success and Areas for Review.

The Guided Risk Framework walks users through an evaluation of potential Threats & Vulnerabilities so they can assess the likelihood and impact of threats to their practice. The SRA Tool may not address all risks that are known. Risks <u>not</u> addressed via the SRA Tool must be documented elsewhere.

Final Summary Reports are available once the user has completed the assessment process.

Content



The SRA Tool's content was developed from the following sources:

- HIPAA Security Rule
- National Institute of Standards and Technology (NIST) Special Publication 800-66
- NIST Special Publication [Guide to Implementing FISMA Security Controls] 800-53
- NIST Special Publication [Guide to Assessing FISMA Controls] 800-53A
- Health Information Technology for Economic and Clinical Health (HITECH) Act

Upcoming content addition:

Assessment questions will reference NIST Cybersecurity Framework guidance

Assessment Content



Content within the Assessment is broken down into these main categories:

Section 1: Security Risk Assessment (SRA) Basics (security management process)
Section 2: Security Policies, Procedures, & Documentation (defining policies & procedures)
Section 3: Security & Your Workforce (defining/managing access to systems & workforce training)
Section 4: Security & Your Data (technical security procedures)
Section 5: Security & Your Practice (physical security procedures)
Section 6: Security & Your Vendors (business associate agreements and vendor access to PHI)
Section 7: Contingency Planning (backups and data recovery plans)

The tool offers dynamic content, so as the Security Rule and NIST guidelines evolve over time and new questionnaire content is developed, it can be downloaded and pulled into the SRA tool easily.

Downloading and Installing the Tool





Home > Topics > Privacy, Security, and HIPAA > Security Risk Assessment Tool

sessment Videos about the assessment process and how it benefits your organization, visit p 10 Myths of the Office for Civil Rights' official guidance.
ecurity Risk organization ensure it is compliant with HIPAA's administrative, physical, and technical safeguards. A risk assessment also helps reveal areas where your organization's protected health information (PHI) could be at risk. To learn more about the assessment process and how it benefits your organization, visit the Office for Civil Rights' official guidance.
curity Risk organization's protected health information (PHI) could be at risk. To learn more about the assessment process and how it benefits your organization, visit p 10 Myths of the Office for Civil Rights' official guidance.
p to Myths of
PAA Basics The Office of the National Coordinator for Health Information Technology (ONC),
in collaboration with the HHS Office for Civil Rights (OCR), developed a downloadable Security Risk Assessment (SRA) Tool to help guide you through the sources & Tools process. The tool is designed to help healthcare providers conduct a security risk
vacy & Security and Medicaid Service (CMS) Electronic Health Record (EHR) Incervice Program.
Iodel Privacy Notice MPN) Download Version 3.0.1 of the SRA Tool [.msi - 75.8 MB] Athinformation entered into the SRA Tool is stored locally to the users' computer
or tablet. HHS does not receive, collect, dem, score or transmit any information ow APIs in Health Care entered in the SRA Tool. The results of the assessment are displayed in a report

Need Help? Please leave any questions comments, or feedback about the SRA Tool using our Health IT Feedback Form. This includes any trouble in using the tool or problems/bugs with the application itself. Also please feel free to leave any suggestions on how we could improve the tool in the future You may also leave a message with our Help Desk by contacting 734-302-4717

Submit Questions Or Feedback



The tool can be downloaded from HealthIT.gov. The downloaded file is the installer for the tool. Double click to run the installer and walk through install process. Once downloaded, a blue "SRA-Tool" icon will appear on your desktop.

Note: Users must have administrative privileges in order to install the SRA Tool. For this reason, you may need help from your IT department or system administrator to install the tool. Admin privileges are not needed to run the tool once it has been installed.

The tool runs on Windows, 7, 8, and 10. All information entered into the tool is contained locally. No information is transmitted to DHHS, ONC or OCR.

Welcome to the SRA Tool





Select "Start New SRA" or "Continue SRA" to begin using the tool.

Enter your name, name your SRA file and select a location to save your SRA file locally.

The "Check for Updates" feature allows you to see if new content updates have been released by ONC.

Entering a Username





When beginning a new assessment, the user is asked to enter their name.

It is recommended to enter your full first & last name.

The SRA Tool supports multiple user accounts, so more than one person can work on an in progress SRA file.

Saving a New SRA





The SRA Tool is set up to work similar to Windows Office programs in the way it saves and opens assessment files.

After entering your name, you then select a file name and save location for the new .sra file.

Files with the .sra extension can be opened and edited with the SRA Tool application.

Starting an SRA



Next >

Navigation is handled using the <u>Next</u> and <u>Back</u> buttons at the bottom of each screen.

The left navigation menu allows users to jump between certain sections of the assessment and report, but due to branching logic, some navigation relies <u>solely</u> on the use of the Next/Back buttons.

The Summary item will not become available until the rest of the assessment has been fully completed.

Entering Practice Information



The Practice Information screen captures some basic information from the practice(s) involved with the assessment.

This information will be included in the printable PDF report available once the assessment is completed.



Tracking Practice Assets





The Assets screen captures a list of IT assets within a practice – computers, diagnostic/imaging equipment, network infrastructure, etc...

Assets can be entered one at a time, or imported in a list from a CSV file by using the Asset Template.

Asset information can be exported from the SRA tool.

Practice Assets – Adding an Asset

	Practice Assets	essment summary
🔒 Home	Enter your practice's <u>assets.</u>	
Practice Info	Consider a Add Asset	x people, materials,
Assets Vendors	Want to <u>a</u> Asset Type Asset Status ePHI Access Laptop Inactive [Storage] • Receives and tran •	
Documents	Disposal Status Disposal Date Asset Encryption	plate
🚮 Summary 🖺 Save	Not Disposed Full disk encryption Asset Assignment Asset ID	, proce
➔ Logout	John AppleseedCID-22120	olate
	Total Asse	cryption Assignment
	Add	
	< Back Next >	



Available Fields

- Asset Type
- Asset Status active, inactive
- ePHI Access does it access PHI?
- Disposal Status if inactive, has it been properly wiped/disposed?
- Disposal Date date asset was disposed
- Asset Encryption type of encryption protection of data
- Asset Assignment who is responsible for this asset?
- Asset ID asset tag or internal identifier
- Comments

Practice Assets – Adding Multiple Assets





Step 1: Download the Asset Template from the SRA Tool Assets section.

Step 3: Upload your completed asset information .csv file into the SRA Tool.

	A	В	С	D	E	F	G	Н	- I	J	K	
1	Туре	Assignment	ID	Asset Status	ePHI	Encryption	Comment	Disposal S	Disposal D	ate		
2	Desktop	Jane Smith	ID-221924	Active [In use	All of the	Full Disk		Not Dispo	sed			
3	Desktop	Edward Randolph	ID-221925	Active [In use	All of the	Full Disk		Not Dispo	sed			
4	Desktop	Hillary Belmont	ID-221926	Active [In use	All of the	Full Disk		Not Dispo	sed			
5	Laptop	Jerry Lucas	ID-221927	Active [In use	All of the	Full Disk		Not Dispo	sed			
6	Laptop	Jane Smith	ID-221928	Active [In use	All of the	Full Disk		Not Dispo	sed			
7	Laptop	Edward Randolph	ID-221929	Active [In use	All of the	Full Disk		Not Dispo	sed			
8	Laptop	Sally Waldo	ID-221930	Active [In use	All of the	Full Disk		Not Dispo	sed			
9	Tablet	Jerry Lucas	ID-221931	Active [In use	All of the	Full Disk		Not Dispo	sed			
10	Tablet	Edward Randolph	ID-221932	Active [In use	All of the	Full Disk		Not Dispo	sed			
11	Phone	Jane Smith	ID-221933	Active [In use	Receives	Full Disk		Not Dispo	sed			
12	Phone	Edward Randolph	ID-221934	Active [In use	Receives	Full Disk		Not Dispo	sed			
13												
14												
15												Ţ

Step 2: Enter your organization's asset information into the template (keeping the template format and the .csv file format)

Save the file once complete.

Tracking Practice Vendors





The Practice Vendors screen captures a list of vendors, business associates, or third parties a practice may do business with.

Vendor information can be entered one at a time, or imported in a list from a CSV file using the Vendor Template.

Vendor information can also be exported from the tool.

Practice Vendors – Adding Vendor Info





Available Fields

- Vendor Name
- Service Type Provided
- Vendor Address
- City, State, Zip
- Phone, Fax
- Contact Name/Title
- Contact Email
- Satisfactory Assurances contract that PHI will be protected
- Additional Risks Assessed
- + Second Contact add another contact for the vendor

Practice Documentation





The Documentation screen allows users to link to supporting documentation for the assessment.

No documents will be imported and saved into the tool, these are simply links to documents stored locally or on a local network to demonstrate accuracy and thoroughness of your responses.

Documents that have been added from the section summary screens (within the assessment) also display here.

Assessment

	Section 2: Security Policies	assessment summary	The Assessment section contains
Home Home Practice Info Assessment	Do you maintain documentation of policies and procedures regarding management and information security activities?		7 sections with multiple-choice questions and branching logic.
Section 1 ✓ Section 2 Section 3 Section 4 Section 5 Section 6 Section 7 Marrier Summary Save E Save Logout	 Yes, we have a process by which management develops, implements, reviews, and updates security policies and procedures. Yes, we have some documentation for our information security and risk management activities, but not all of our policies and procedures are documented. No, we do not maintain documentation on our information security activities or risk management. 	Education You should document policies and procedures to ensure you consistently make informed decisions on the effective monitoring, identification, and mitigation of risks to ePHI.	The Education panel provides guidance related to each response given. The Reference panel links each question to a HIPAA Security Rule citation.
	✓ Back Next >	Reference For additional information, see Security Rule 45 CFR	Progress indicators are provided in the navigation panel as

§164.316(a)

19

sections are completed.

Rating Threats & Vulnerabilities

	Section 1: SRA Basics		practice	assessment summar						
✿ Home Practice Info Assessment	Select the <u>vulnerabilitie</u>	es that apply to	your practice from the	list below.						
Section 1 Section 2 Section 3 Section 4 Section 5 Section 6 Section 7	 Inadequate risk awareness or failure to id Failure to remediate known risk(s) Failure to meet minimum regulatory required Inadequate Asset Tracking Unspecified workforce security responsible 	uirements and secur								
☆ Summary 卧 Save ➔ Logout		Fractice Info Assessment Section 1 Section 2	Section 1: SRA Basics Please rate the li Inadequate risk awareness	kelihood and impact c or failure to identify new wea		oractice	practice e of each p		ssment	sum
		Section 3 Section 4 Section 5 Section 6	Non-physical threat(s) such as information disclosure, interrup and business processess, and/o breaches	ption of system function	L	<u>ikelihoo</u>	H	C	M	H
		Section 7 Cummary Save	Physical threats such as unauth hardware or equipment malfur hazards, and/or hazardour mat etc.)	nction, collisions, trip/fire	0	M	Ø	C	Μ	H
		Ð Logout	Natural threat(s) such as dama extreme temperatures, severe desctruction from animals/inse	weather events, and/or	0	М	H	C	Μ	H
			Man-Made threat(s) such as in theft/vandelism, terrorism/civil hackers/computer criminals		C	Μ	H	C	Μ	H
			Infrastructure threat(s) such as power/telephone outages, wat		L	М	H	C	М	H



The Vulnerability Selection and Threat Rating section is presented after each section of multiple-choice questions.

Users are asked to select from a list of vulnerabilities that may be applicable to their practice.

Each vulnerability comes with a list of related threats that must be rated for the likelihood they may occur and the **impact** they would have should they occur.

Assessment Section Review



Each section is concluded with a Section Summary. The Section Summary shows each of the questions answered, responses, and education content.

Questions are divided into <u>Areas of</u> <u>Success</u> and <u>Areas for Review</u>. Questions sorted into Areas of Success are those which represent the highest level of compliance. Areas for Review represent responses that could use improvement.

Users can enter Additional Information specific to each assessment section and add/link relevant documents necessary to demonstrate accuracy and thoroughness of responses.

Conducting a Thorough Assessment





The HIPAA Security Rule's risk analysis requires an accurate and thorough assessment of the potential risks and vulnerabilities to all of the ePHI the organization creates, receives, maintains, or transmits.

- When responding to questions to identify and assess potential risks, organizations should consider how the questions apply throughout its entire enterprise.
- Organizations should take care that its responses reflect an accurate and thorough assessment of the questions presented, and are not merely a clerical exercise to produce a report.
- Responding to questions without considering how the questions apply throughout the
 organization may result in a risk analysis that is not accurate and thorough as required by the
 HIPAA Security Rule.

Conducting a Thorough Assessment Continued

If potential risks to the confidentiality, integrity, and availability of an organization's ePHI are known to the organization, but unaccounted for by the SRA Tool, the organization should identify and assess these potential risks by either:



- 1. Documenting the potential risks in the most appropriate place within the tool.
- 2. Supplement the tool with additional documentation that includes the potential risks supplemental documentation can be attached to the tool using the add document functionality.

Summary Report



After all sections are complete, the Summary section becomes available.

The Summary Report is high level summary of your risk assessment.

Risk Score – shows the number of questions sorted into Areas for Review divided by the total questions the user answered.

Areas for Review – shows the total number of questions answered sorted into Areas for Review.

Vulnerabilities – shows the total number of vulnerabilities selected as applicable to the practice or organization.

Each assessment section's Risk Score is shown as a percentage.

Understanding the Summary Report Scoring





Risk Score – shows the number of questions sorted into Areas for Review divided by the total number of questions the user was *presented and answered*.

The assessment section includes branching logic, so depending on how each user answers each question, they may be presented with different subsequent questions. The SR Areas for Review Score – shows the total number of questions answered sorted into Areas for Review.

This is a count across all assessment sections and provides the total number of questions in Areas for Review. Vulnerabilities Score – shows the total number of vulnerabilities selected as applicable to the practice or organization.

This is a count across all assessment sections and provides to the total number of vulnerabilities the user selected as applicable to their organization.

The SRA Tool provides scoring in terms of Risk, <u>not</u> Compliance.

Risk Report





The Risk Report identifies all areas of risk collected across your entire assessment.

Each vulnerability selected is shown here along with each response that fell into the category Areas for Review.

Risk Breakdown – shows a sum of threat ratings in each risk level (Low, Medium, High, and Critical).

Risk Assessment Rating Key – shows how likelihood and impact ratings combined create the risk level.

Understanding the Threats & Vulnerability Scoring



Threats & Vulnerabilities are categorized using a Risk Assessment Matrix as shown here. The Risk Breakdown pie chart shows a sum of threat ratings in each risk rating level (Low, Medium, High, and Critical).

During the assessment, each threat rated by the user in terms of likelihood and impact, is captured by the SRA Tool and provided risk rating level (Low, Medium, High, and Critical).

For example, if a user selected a threat as having low likelihood, but high impact, the resulting risk level rating level would be High. The number of threats with a High risk rating level are then totaled and shown in the Risk Breakdown chart on the left.

Risk Report

	Risk Report		pra	ctice assessment summary
Home Practice Info Sessment Summary		<u>y risk assessment</u> by reviewir view your areas of review and co	g the matrix below.	
Risk Report Detailed Report Save	Areas for Review Section	Question	Your Answer	Education
➔ Logout	Section	Question	four Answer	Include all information
	1	Q4. Do you include all information systems containing, processing, and/or transmitting ePHI in your SRA?	No.	systems that contain, process, or transmit ePHI in your security risk assessment. In addition, document your systems in a complete inventory.
	Section	Question	Your Answer	Education
	2	Q2. Do you review and update your security documentation including	Yes, we review and update our documentation periodically or as peeded	You should implement a process to periodically review and update your security policies and procedures. This will help

The Risk Report displays the selected Vulnerabilities and Threat Ratings, as well as, all questions that were sorted into "Areas for Review".

Users can review the question, their answer, and the education guidance so they know how to improve their security and mitigate risk in that area.

Detailed Report

	Detailed Report			practice	assessment summary	
☆ Home Practice Info	Click each section to ex	pand and review more deta	ils.		No.	
E Assessment	 Section 1, SRA Basi 	cs			Risk Score: 11%	Â
Risk Report Detailed Report	✓ Section 2, Security				Risk Score: 25%	
💾 Save	Threats & Vulnerabil	ities			Risk Rating	
Ð Logout		ty procedure information w horized access to ePHI or s				
		nonzed access to ePHI of s nation permitted	ensitive		Medium	
	Disrup	otion of information system	function		High	
	ePHI e	exfiltrated to unauthorized	entities		Medium	
	Inside	r carelessness causing disru	uption		Medium	
	Inside	r carelessness exposing ePł	HI		Critical	
	Question	Answer	Compliance <u>Guidance/Rule</u>	Username	Date/Time	
	Q1. Do you maintain documentation of policies and procedures regarding risk assessment, risk	Yes, we have a process by which management develops, implements, reviews, and updates	Required	Ryan	Wed Sep 26 09:53:47 EDT 2018	~

The Detailed Report is a collection of all data captured throughout the entire assessment.

Each question and response, each threat and vulnerability rating, all of the Practice Information, Assets, and Vendor information is shown in the Detailed Report. There is also an audit log of each contributing user with a date/time stamp.

The PDF button near the top right corner of the screen allows the user to save the Detailed Report as a PDF.

Upcoming SRA Tool Enhancements



- Version 3.0.1 (current version)
 - Security updates
- 3.1 (upcoming release)
 - Highlight missed threat and vulnerability ratings
 - Mechanism to select multiple and "delete all" assets and vendors
 - Adding NIST Cybersecurity Framework references to each question
 - Excel export of Detailed Report
 - "In Process" reporting functionality, question flagging (skip question)

Follow @ONC_HealthIT on Twitter to receive updates on the SRA Tool.

Part Two: Call for User Feedback



- Submit feedback via the feedback form <u>here</u>
- Feedback can always be submitted to <a>SRAHelpDesk@Altarum.org

Assistance with the SRA Tool



Reference the <u>SRA Tool User Guide</u> and additional information.

Contact the SRA Tool Helpdesk: Email: <u>SRAHelpDesk@Altarum.org</u> Phone: 734-302-4717

Submit Questions through the <u>HealthIT Feedback Form</u>

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