### Check Your Cyber Pulse: Basic Practices for Small Entities

The "Check Your Cyber Pulse" series was produced by the 405(d) Task Group to provide your healthcare organization with a quick reference for maintaining cybersecurity readiness everyday. To address "Risky" and "Very Risky" behaviors, or to learn more about cyber safety, check out the 405(d) <u>Health Industry Cybersecurity Practices: Managing Threats</u> and Protecting Patients (HICP) publication and always stay in contact with your organization's IT or cybersecurity representative.







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### **Check Your Cyber Pulse: Basic Email Practices** for Small Entities

#### **Mitigated Threats** Key Healthy ✓ Social engineering ✓ Ransomware attacks Risky ✓ Insider. accidental or malicious data loss Very Risky

	Dı	icinoce Email
		ISINESS EINAI
of our staff email	enterprise	consumer email
addresses on a business email system that is used for all business email communications.	system dedicated to managing business emails.	addresses for business email communications. It's cheaper.
Multifaq	tor Authenti	cation (MFA)
All of our users use MFA to access their	Only our leadership or administrators	We don't use MFA here.
email accounts.	to use MFA to	
	access their email accounts	
Po	olicies and Pr Sending Uner	ocedures for crypted PHI
If a patient requests unencrypted emails to be sent	If a patient requests unencrypted emails to be	If a patient requests unencrypted emails to be sent to them,
to them, our staff knows to follow	sent to them, we have policies	our staff will figure out what to do.
the policies and	and procedures	
place to handle those requests.	they may not be followed consistently.	
Transmi	ssion of Uner	crypted PHI
Our staff knows that sending unencrypted PHI isn't allowed, except in cases specifically directed by a	Our policy says that we shouldn't transmit unencrypted PHI, but our staff may not understand what that includes.	We don't prohibit the transmission of unencrypted PHI.

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Practices



patient's request.













Identity and Access Data Protection and Management Loss Prevention





IT Asset Management







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### **Check Your Cyber Pulse: Endpoint Protection** for Small Entities



#### Local Account Management

Our organization restricts local administrator accounts. We don't share accounts. We create unique accounts for each user.

We allow users to We don't have share accounts or use generic ones.

time to manage unique local accounts. Our admin accounts can access the Internet to save time.

#### Multifactor Authentication (MFA)

Our organization uses MFA when accessing all critical data systems and applications.

We don't have Our organization MFA fully doesn't use MFA deployed for all when accessing critical data applications and users. We use it systems. for some systems.

		Patching
We have a routine patching process.	We don't routinely patch endpoints, but we do it sometimes.	What does "patching endpoints" mean?

- 1			-	. •
-na	no	Int	Fncr	vbπor

We use full disk encryption.

We use file based encryption.

We don't bother with encryption.

#### Antivirus

Our basic endpoint antivirus software is configured to update automatically.

We have basic endpoint antivirus software, but it's sometimes not active or updated.

We don't have basic endpoint software, or it's outdated.

#### Firewall

Our operating system firewall is enabled.

Our operating system firewall is disabled.

We don't use a firewall. or it's outdated.

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### **Check Your Cyber Pulse: Identity and Access** Management for **Small Entities**



#### **User Account Management**

Our organization assigns separate user accounts to each employee. We are trained and regularly reminded to never share our passwords or accounts. Our organization disables access immediately for users who leave the organization.

We sometimes share generic accounts amongst employees to save time. If someone is terminated, that person's account access isn't always revoked.

Our user roles

reviewed.

We don't bother disabling user access as soon as they leave the organization. They won't be around to get in any systems.

#### **Password Management**

Our organization has a password complexity policy in place.

Our passwords are simple and are irregularly reset.

We don't have a password policy. Passwords have not been changed since the vendor created them.

#### **Provide Role-Based Access**

Our organizations gives access to critical systems based on users' roles and requirements (also known as provisioning).

All of our and requirements organization's aren't regularly

users have the same access to the same systems.

#### Multifactor Authentication (MFA)

Our organization requires MFA for all systems and users

We use MFA for some systems.

MFA takes too long. We don't use it.

#### VPN for Enterprise Access

VPN is our only access to sensitive internal services/ information

Our organization requires VPN to access some, but not all, internal

resources.

We don't use VPN for any access.

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### **Check Your Cyber Pulse: Data Protection and** Loss Prevention for **Small Entities**



#### **Control Sensitive Data** I do the best I We don't have

Our policies address all user interactions with sensitive data and reinforce the consequences of lost or compromised data. policies in place to enforce anything. But, our organization expects that we appropriately manage sensitive data.

documents

containing

information.

sometimes.

sensitive

#### **Proper Destruction of Data**

We shred documents or use a secure disposal service, and we properly dispose of data and equipment.

We do not destroy We dump documents containing patient information in the trash or recycling bin when we are no longer required to keep them.

can to secure

sensitive data.

#### **Transmitting Sensitive Data**

When e-mailing PHI, we use a secure e-mail protocol and network. We only store PHI on encrypted computers or servers, and we avoid using removable or mobile devices.

We encourage We send using secure messaging for sensitive data, but we don't We use We discourage use of unecrypted storage for storage, but it's not really monitored.

unencrypted sensitive data to clients via regular email clients. unencrypted sensitive data transmission.

#### Education

Our organization mandates training on handling sensitive data, policies and procedures.

Our organization informally trains staff.

We don't have time for training. We're trying to keep up with our work.

#### **Regulatory Compliance**

We have a data classification policy that categorizes data as: Sensitive, Internal Use, or Public Use.

We have a process in place to de-identify data, but l'm not sure if it complies with healthcare regulation.

What healthcare regulations do we need to comply with?

**Check Your Cyber Pulse** 

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			Mitigated Threats K	ey
	Che	ck Your C	<ul> <li>✓ Social engineering</li> <li>✓ Insider, accidental or malicious data loss</li> <li>✓ Loss or theft of</li> </ul>	ealthy
		Asset M	agement equipment or data	sky
Procedures for ha	andling devices	no longer in use	medical devices that may affect patient safety	ery Risky
We have a	We have	We don't	Inventory of Network Equipment	
documented procedure that ensures all devices are securely decommissioned and removed from inventory according to company standards.	ocumenteddocumenteddocumentedrocedure thatprocedures forhandnsures all deviceshandling the finaldispore securelydisposal of someassetecommissionedtypes of devices,themnd removedbut not all.roomom inventorydisposal of somea fewcording toa fewa few		We have an inventory list of network equipment, such as routers, switches, access points, firewalls, and Internet of Things (IoT) assets. The list covers all important fields, such as Asset Tag Number, Manufacturer, Model, Location, Serial Number, In- missing	We don't keep a network asset inventory.
Procedures for adding new equipment, devices, or software           We have a documented procedure that instructs         We have document document how to compare the instructs in the second document how to compare the second document how			Service Date, IP Address, OS Version, and MAC Address. We follow an audit process frequently to ensure our information is correct.	
and configured according for some asset		to add new		
and configured accord	ing for some	to add new assets: network	Inventory of Mobile Devices	
and configured accord to company standards. We frequently review these procedures to ensure configurations remain secure.	oried procedures ing for some asset types, but not all.	to add new assets: network equipment, devices, or software. Doesn't the vendor do that?	Inventory of Mobile Devices We have an inventory list of mobile devices, including personal devices/bring your own devices (BYOD). The list covers all important fields,	We don't keep a mobile device asset
and configured accord to company standards. We frequently review these procedures to ensure configurations remain secure.	vried procedures for some asset types, but not all.	to add new assets: network equipment, devices, or software. Doesn't the vendor do that?	Inventory of Mobile Devices We have an inventory list of mobile devices, including personal devices/bring your own devices (BYOD). The list covers all important fields, such as Asset Tag Number (if available). Manufacturer	We don't keep a mobile device asset inventory.
and configured accord to company standards. We frequently review these procedures to ensure configurations remain secure. Inventory list of software applications we use. The list covers all important fields. We follow an audit process frequently to ensure o	<ul> <li>ried procedures for some asset types, but not all.</li> <li>r of Software App We have an inventory list the captures softwa assets, but the information is incomplete, we missing import</li> </ul>	to add new assets: network equipment, devices, or software. Doesn't the vendor do that?	Inventory of Mobile Devices We have an inventory list of mobile devices, including personal devices/bring your own devices (BYOD). The list covers all important fields, such as Asset Tag Number (if available), Manufacturer, Model, Location, Serial Number, In-Service Date, IP Address, OS Version, and MAC Address. We follow an audit process frequently to ensure our information is correct.	We don't keep a mobile device asset inventory.
and configured accord to company standards. We frequently review these procedures to ensure configurations remain secure. Inventory list of software applications we use. The list covers all important fields. We follow an audit process frequently to ensure o information is correct.	vied procedures for some asset types, but not all. vof Software Ap We have an inventory list th captures softwa assets, but the information is incomplete, missing importa elements, or no	to add new assets: network equipment, devices, or software. Doesn't the vendor do that?	Inventory of Mobile DevicesWe have an inventory list of mobile devices, including personal devices/bring your own devices (BYOD). The list covers all important fields, such as Asset Tag Number (if available), Manufacturer, Model, Location, Serial Number, In-Service Date, IP Address, OS Version, and MAC Address. We follow an audit process frequently to ensure our information is correct.We have an inventory list that captures mobile devices, but the information is incomplete, missing important elements, or not reviewed routinely.Inventory of Computers and Servers	We don't keep a mobile device asset inventory.
and configured accord to company standards. We frequently review these procedures to ensure configurations remain secure. Inventory list of software applications we use. The list covers all important fields. We follow an audit process frequently to ensure o information is correct.	<ul> <li>procedures</li> <li>for some</li> <li>asset types,</li> <li>but not all.</li> <li>of Software Ap</li> <li>We have an</li> <li>inventory list th</li> <li>captures software assets, but the</li> <li>information is</li> <li>incomplete,</li> <li>missing importa</li> <li>elements, or no</li> <li>reviewed routing</li> </ul>	to add new assets: network equipment, devices, or software. Doesn't the vendor do that?	Inventory of Mobile DevicesWe have an inventory list of mobile devices, including personal devices/bring your own devices (BYOD). The list covers all important fields, such as Asset Tag Number (if available), Manufacturer, Model, Location, Serial Number, In-Service Date, IP Address, OS Version, and MAC Address. We follow an audit process frequently to ensure our information is correct.We have an inventory list that captures mobile devices, but the information is incomplete, missing important elements, or not reviewed routinely.Inventory of Computers and Servers Our organization hasWe have an inventory by the to the intervention by the total bases with the intervention bases we have an inventory by the bases we have an invent	We don't keep a mobile device asset inventory.
and configured accord to company standards. We frequently review these procedures to ensure configurations remain secure. Inventory We have an inventory list of software applications we use. The list covers all important fields. We follow an audit process frequently to ensure o information is correct. We have an inventory that stores information containing all important fields. We follow an audit process frequently to ensure our information is correct.	vied procedures ing for some asset types, but not all. vof Software Ap We have an inventory list th captures softwa assets, but the information is incomplete, missing importa elements, or no reviewed routir nventory of Cor We have an inventory list that captures connect device assets, but the information is incomplete, missi important elemer not reviewed rout	to add new assets: network equipment, devices, or software. Doesn't the vendor do that?	Inventory of Mobile DevicesWe have an inventory list of mobile devices, including personal devices/bring your own devices (BYOD). The list covers all important fields, such as Asset Tag Number (if available), Manufacturer, Model, Location, Serial Number, In-Service Date, IP Address, OS Version, and MAC Address. We follow an audit process frequently to ensure our information is correct.We have an inventory list that captures mobile devices, but the information is incomplete, missing important elements, or not reviewed routinely.Inventory of Computers and Servers our information has a hardware inventory list that includes computers and servers. It covers all important fields, including when hardware is decommissioned. We follow an audit process frequently to ensure our information is correct.We have an inventory list that captures computer and server information, but the information, but the information, but the information, but the information, but the information, but the information, but the information is incomplete, missing important elements, or not reviewed routinely.We have an inventory list that captures computer and server information, but the information, but the information is incomplete, missing important elements, or not reviewed routinely.	We don't keep a mobile device asset inventory.

maintaining cybersecurity readiness everyday. To address "Risky" and "Very Risky" behaviors, or to learn more about cyber safety, check out the 405(d) Health Industry Cybersecurity Practices: Managing Threats and Protecting Patients (HICP) publication and always stay in contact with your organization's IT or cybersecurity representative and HIPAA and privacy officer.



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## **Check Your Cyber Pulse: Network Management** for Small Entities

#### **Mitigated Threats**

- ✓ Ransomware attacks ✓ Loss or theft of equipment
- Insider, accidental or malicious data loss
- Attacks against network connected medical devices that can affect patient safety

Our data and

network closets

employees can go.

Same goes for our

are only where

network ports.

**Physical Security** 

Our physical

wireless networks

permitted access.

Data and network

closets are always

change the code on the locks if an employee who knew the code leaves. Network

are configured

to only allow

locked. We

spaces and



I'm not sure what

I'm pretty sure we

don't have a data

or network closet.

a "port" is. And,

#### Our networks are configured to restrict access between devices to limit data exchange to only what is required to carry out operations. We only allow tightly controlled access to digital devices.

We use an IPS.

and it updates

automatically!

We don't restrict Internet-bound access from computers and other digital devices into our network. But, our hosting service takes care of security.

#### **Network Segmentation**

the Internet. It's more convenient. and we've never had an issue.

Our servers are

accessible from

### Intrusion Prevention

prevention covered.

#### Our third party IT support and vendors probably have intrusion

What's an IPS?

**Guest Access** 

ports are inactive when not in use.

Our guest network only has access to the Internet. We have a separate network for staff. No staff use the guest network.

Our guest network only has access to the Internet. Staff use the guest network sometimes.

We only use one Wi-Fi network for all our users: staff, patient, and any guests.

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### **Check Your Cyber Pulse: Vulnerability** Management for **Small Entities**



#### Passwords

We always use strong passwords. We have a policy on changing passwords at defined intervals.

It's better to use the same password for all sites. How else would vou remember them all?

#### Software

We patch software at defined intervals. We use automatic patches.

We patch software intermittently. Sometimes we use out-of-date software.

We never use automatic patches. Don't our vendors do that for us?

At defined
intervals, we run
a scan on web
applications, such
as patient portals
to get a report on
security flaws.

applications intermittently.

#### Web Applications We scan web

We've never scanned a web application. Don't our vendors do that for us?

#### Servers

We run a vulnerability scan on servers connected to the Internet.

We run scans intermittently. We've never scanned a server. Don't our vendors do that for us?

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**Check Your Cyber Pulse: Network Connected Medical Device Security** for Small Entities

#### **Mitigated Threats**

✓ Attacks against network connected medical devices that can affect patient safety

Key Healthy Risky Very Risky

#### Asset Management, Hardware

We keep an updated inventory list of network connected medical devices.

Our inventory list isn't current; new devices aren't added in a timely manner. **Obsolete** devices aren't removed from our list.

Maybe someone in our organization has an old list. But, I don't know which medical devices are connected to our networks.

#### Asset Management, Software

We maintain a full software component inventory list for medical devices.

We don't keep Our software inventory list of information medical devices about our medical is incomplete. device software at best. components.

"wipe out"

a medical

#### Asset Management, Wiping

We assure that all data on the device are "wiped" when a medical device is to be decommissioned.

We sometimes We don't "wipe out" the data on the data when decommissioned medical devices. device is to be decommissioned.

#### **Network Management** We have limited

Our clinic network is separate from the guest network. Our medical devices are connected only to dedicated. highly restricted networksseparated from general access.

We don't segment segmentation or our networks. wrongly configured segmentation.

#### **Endpoint Protection**

We assure a full list of controls are enabled on medical devices (e.g., antivirus software. local firewalls, encryption).

We have some endpoint protection enabled, but patches and upgrades aren't installed in a timely manner.

We don't bother with endpoint protection.

#### **Procurement & Security Evaluations**

Our initial phase of medical device acquisition process includes a security evaluation of the device. Our organization requires that we get a Manufacturer Disclosure Statement for Medical Device Security (MDS2) for all medical devices.

We don't get complete information about a medical device's cybersecurity profile during the procurement process.

We don't consider the security profile of a medical device even when we are purchasing it. Doesn't the vendor have to do that?

#### Identity and Access Management

We maintain current authentication to allow only proper users with the appropriate credentials to access the right devices. We use MFA to authenticate the user.

Our authentication isn't updated. Our remote access doesn't require MFA. Users who have left the organization may still have access to devices. Our medical device vendors may be using the same passwords for all customers.

We don't require authentication (including MFA) or unique passwords to access medical devices.

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### **Check Your Cyber Pulse: Basic Policy Cyber Hygiene for Small** Entities

#### **Roles & Responsibilities**

Our organization describes cybersecurity roles & responsibilities in writing, including the person(s) responsible for implementation of security practices & policies.

We don't have We have a cybersecurity policy, but it doesn't have many details about roles & responsibilities

roles and responsibilities defined for cybersecurity.

In writing, we fully describe the mechanisms by which our staff are trained on cybersecurity practices, threats, and mitigations.

**Education & Awareness** Our policies Our policies don't mention training. mention training. We sometimes We're also too busy train staff on to stop our work cybersecurity and do a "training." practices, threats, and mitigations.

### Acceptable Use/Email Use

Our policies describe what actions users are permitted and not emails in our policies. permitted to execute, For instance, "Try to including detailed descriptions of how email is to be used to complete work.

We have some We all know guidance about using how to do our jobs and use email. We send PHI using a secure don't need email" or "Don't click on a policy. attachments in an email if it looks suspicious."

### Incident Reporting & Checklist

We describe requirements for users to report suspicious activities in the organization and documents/ reports to manage incident response.

Our policies require users to report suspicious activities to the organization. We don't have a set way for users to document/report suspicious activities for incident response or who to go to.

Of course, we're expected to report suspicious activities to our leadership. What we consider suspicious sometime varies; how do you describe suspicious"?



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Network

Management













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data classification policy.

We don't have a

Healthy

Risky

Very Risky

#### **Personal Devices**

Our policies describe the organization's position on usage of personal devices, also We can use our referred to as bring your own device (BYOD). When personal devices can be used, our policies describe how the devices are managed.

Our policies have something about BYOD. own however we need to.

**Mitigated Threats** 

✓ Social engineering

✓ Loss or theft of

✓ Ransomware attacks

equipment or data Insider, accidental or

malicious data loss Attacks against network connected medical devices

that can affect

patient safety

Our policies

indicate that

classified but

they don't say

how to classify

it. Sometimes

you have to take

your best guess.

**Data Classification** 

classified, with usage data should be

Our policies

classification.

should be in line

with Cybersecurity

Practice #4: Data

Protection and

Loss Prevention.

describe how data is

parameters for each

These classifications

Key

Our organization doesn't have a personal device policy. We haven't had a problem with it.

#### Laptop, Portable Device, & Remote Use

Our policies regarding mobile device security are extensive. We describe how mobile devices may be used in a remote setting.

Our policies address We don't have mobile device use. The description of mobile device security is limited.

policies on mobile device security nor how mobile devices may be used in a

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### **Check Your Cyber Pulse: Security Operations Center & Incident Response for Small** Entities

#### **Mitigated Threats**

- ✓ Social engineering
- ✓ Ransomware attacks
- ✓ Loss or theft of equipment or data Insider, accidental or
- malicious data loss Attacks against network connected
- medical devices that can affect patient safety



#### **Incident Response Plan**

We have an Incident Response Plan and all employees understand what to do if there is an incident (data breach or other information security issue).

We probably have an Incident Response Plan, but no one has paid much attention to it.

We don't need a **Incident Response** Plan. We're so small that we won't ever have a major data breach or other "incident."

#### **Information Sharing**

We are active members of an Information Sharing and Analysis Center (ISAC). We know that our ISAC can help us with incident response when needed.

We don't belong to an ISAC, and we don't care what an ISAC is.

#### Health Sector Cybersecurity Coordination Center (HC3) or **ISAC Cyberthreat Alerts**

We use cvberthreat alerts for insight into current cybersecurity threats and vulnerabilities.

cyberthreat alerts. but there's no one here to act on them. We're busy taking care of patients.

We don't receive alerts. Or. the alerts don't matter to us.

# We receive

#### maintaining cybersecurity readiness everyday. To address "Risky" and "Very Risky" behaviors, or to learn more about cyber safety, check out the 405(d) Health Industry Cybersecurity Practices: Managing Threats and Protecting Patients (HICP) publication and always stay in contact with your organization's IT or cybersecurity representative and HIPAA and privacy officer.



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Center and Incident Response

Security Operations Network Connected Medical Device Security

Cybersecurity Oversight and Governance

What 's an ISAC?