

SECURING ELECTRONIC HEALTH RECORDS ON MOBILE DEVICES

Risk Assessment and Outcomes

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DRAFT

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Health IT Sector

DRAFT

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NATIONAL CYBERSECURITY CENTER OF EXCELLENCE

The National Cybersecurity Center of Excellence (NCCoE) at the National Institute of Standards and Technology (NIST) addresses businesses' most pressing cybersecurity problems with practical, standards-based solutions using commercially available technologies. The NCCoE collaborates with industry, academic and government experts to build modular, open, end-to-end reference designs that are broadly applicable and repeatable. The center's work results in publicly available NIST Cybersecurity Practice Guides, Special Publication Series 1800, that provide users with the materials lists, configuration files, and other information they need to adopt a similar approach.

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NIST CYBERSECURITY PRACTICE GUIDES

NIST Cybersecurity Practice Guides (Special Publication series 1800) target specific cybersecurity challenges in the public and private sectors. They are practical, user-friendly guides that facilitate the adoption of standards-based approaches to cybersecurity. They show members of the information security community how to implement example solutions that help them more easily align with relevant standards and best practices.

The documents in this series describe example implementations of cybersecurity practices that may be voluntarily adopted by businesses and other organizations. The documents in this series do not describe regulations or mandatory practices, nor do they carry statutory authority.

ABSTRACT

Health care providers increasingly use mobile devices to receive, store, process, and transmit patient clinical information. According to our own risk analysis, discussed here, and in the experience of many health care providers, mobile devices can present vulnerabilities in a health care organization's networks. At the 2012 Health and Human Services Mobile Devices Roundtable, participants stressed that mobile devices are being used by many providers for health care delivery before they have implemented safeguards for privacy and security.*

This NIST Cybersecurity Practice Guide provides a modular, open, end-to-end reference design that can be tailored and implemented by health care organizations of varying sizes and information technology sophistication. Specifically, the guide shows how health care providers, using open source and commercially available tools and technologies that are consistent with cybersecurity standards, can more securely share patient information among caregivers using mobile devices. The scenario considered is that of a hypothetical primary care physician using

* Mobile Devices Roundtable: Safeguarding Health Information Real World Usages and Safeguarding Health Information Real World Usages and Real World Privacy & Security Practices, March 16, 2012, U.S. Department of Health & Human Services

her mobile device to perform reoccurring activities such as sending a referral (e.g., clinical information) to another physician, or sending an electronic prescription to a pharmacy. While the design was demonstrated with a certain suite of products, the guide does not endorse these products in particular. Instead, it presents the characteristics and capabilities that an organization's security experts can use to identify similar standards-based products that can be integrated quickly and cost-effectively with a health care provider's existing tools and infrastructure.

KEYWORDS

implement standards-based cybersecurity technologies; mobile device security standards; HIPAA; electronic health record system; risk management; electronic health record security; breaches of patient health information; stolen medical information; stolen health records

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Table of Contents

Disclaimer	ii
National Cybersecurity Center of Excellence	iii
NIST Cybersecurity Practice Guides	iii
Abstract.....	iii
Keywords	iii
Acknowledgements.....	iv
List of Figures	v
List of Tables	vi
1 Practice Guide Structure	1
2 Introduction	1
3 Results.....	2
4 Security Controls Assessment.....	3
4.1 Security Scenario Assessment.....	4
4.2 Functional Assessment	6
4.3 Security Assessment.....	6
5 Risk Assessment Methodology	7
5.1 Table-Driven Risk Assessment Example:	8
5.2 Ramparts' Attack/Fault-Tree-Driven Risk Assessment Example.....	17
6 Risk Assessment Results.....	23
6.1 Table-Driven Risk Assessment Results	23
6.2 Fault-Tree Risk Assessment Results.....	35
7 Tests Performed in Security Controls Assessment	67
8 Risk Questionnaire for Health Care Organizations Selecting a Cloud-Based Electronic Health Record Provider.....	73
8.1 Introduction.....	73
8.2 Security Questionnaire.....	73

LIST OF FIGURES

Figure 1: The steps necessary for a user and device to gain access to the electronic health record server.	2
Figure 2: An example of the process for determining which tests to include in the security assessment.	7

LIST OF TABLES

Table 1: Adversarial Risk Template	10
Table 2: Adversarial Risk Sample Walkthrough	11
Table 3: Non-Adversarial Risk Template	13
Table 4: Non-Adversarial Risk Sample Walkthrough	13
Table 5: Assessment Scale – Overall Likelihood	15
Table 6: Assessment Scale – Level of Risk (combination of likelihood and impact)	16
Table 7: Table-Driven Results – Adversarial Risk based on Confidentiality	23
Table 8: Table-Driven Results – Adversarial Risk based on Integrity	25
Table 9: Table-Driven Results – Adversarial Risk based on Availability	27
Table 10: Table-Driven Results – Non-Adversarial Risk based on Confidentiality	29
Table 11: Table-Driven Results – Non-Adversarial Risk based on Integrity	31
Table 12: Table-Driven Results – Non-Adversarial Risk based on Availability	33
Table 13: Fault-Tree Results Based on Confidentiality	35
Table 14: Fault-Tree Results Based on Integrity	45
Table 15: Fault-Tree Results Based on Availability	56

1 PRACTICE GUIDE STRUCTURE

This NIST Cybersecurity Practice Guide describes a standards-based reference design and provides users with the information they need to replicate this approach to securing electronic health records transferred among mobile devices. The reference design is modular and can be deployed in whole or in parts.

This practice guide is made up of five volumes:

- NIST SP 1800-1a: Executive Summary
- NIST SP 1800-1b: Approach, Architecture, and Security Characteristics – what we built and why
- NIST SP 1800-1c: How To Guides – instructions to build the reference design
- NIST SP 1800-1d: Standards and Controls Mapping – listing of standards, best practices, and technologies used in the creation of this practice guide
- **NIST SP 1800-1e: Risk Assessment and Outcomes – risk assessment methodology, results, test and evaluation**

← YOU ARE HERE

2 INTRODUCTION

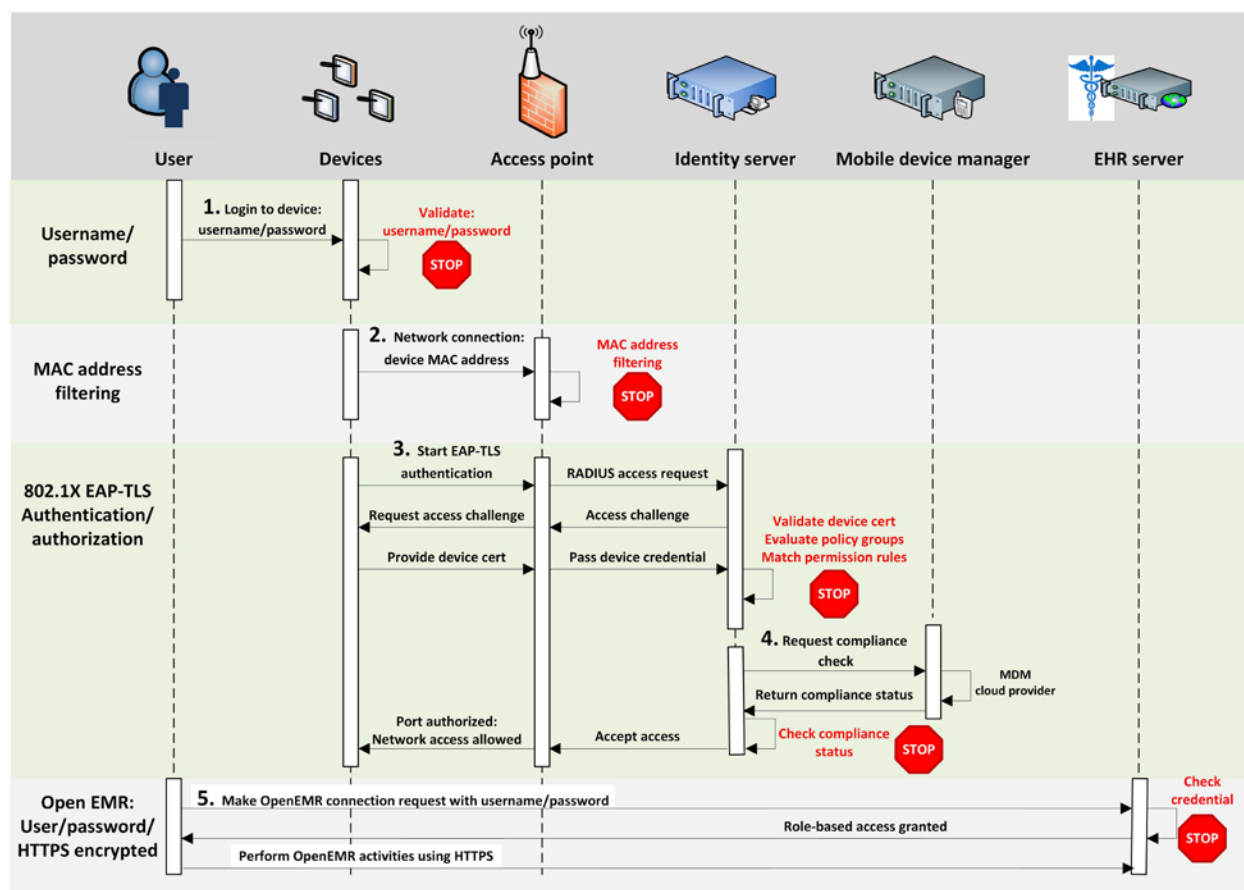
NIST SP 1800-1e: Risk Assessment and Outcomes, addresses the methodology used to conduct the reference design system risk assessment, the results of that risk assessment, the intended outcomes of implementing the reference design, and the results of the reference design functional test. This volume is broken into six sections:

- Results – the workflow and summary of the security control implementation (Section 3)
- Security Controls Assessment – scenario based evaluation of the security functionality of the reference design (Section 4)
- Risk Assessment Methodology – the two approaches we took in conducting a system risk assessment of the reference design (Section 5)
- Risk Assessment Results – detailed results of the risk assessments we conducted (Section 6)
- Security Controls Test and Evaluation – security controls and the evidence of their implementation (Section 7)
- Risk Questionnaire for health care organizations selecting a cloud-based EHR provider (Section 8)

32 3 RESULTS

33 The features in this reference design and our process of continued risk assessment increase
 34 the difficulty for an adversary to gain unauthorized access to patient health information.¹ At the
 35 same time, we want to provide authorized users with easy access. The architecture is designed
 36 to enhance protection for patient information while minimizing changes to use of systems. As
 37 with all components of this reference design, every organization needs to make its own risk-
 38 based determinations about which of these capabilities to implement and how.

39 The security features of the reference design are modeled around the business workflow of a
 40 typical user accessing the EHR. This workflow and the relevant security checks are illustrated
 41 in Figure 1.



42
 43 Figure 1: The steps necessary for a user and device to gain access to the electronic health record server.

¹ Here the term “patient health information” refers to any information pertaining to a patient’s clinical care. “Protected health information” has a specific definition according to HIPAA that is broader than our scope. We are using “patient health information” so we do not imply that we are further defining protected health information or setting additional rules about how it is handled.

44 Prior to being granted access to the EHR, the user must follow the following five steps.
 45 However, since ease of use is paramount when it comes to the likelihood of adoption in real
 46 world environments, all but steps 1 (logging on to the device) and 5 (logging into the EHR) are
 47 transparent to the user.

48 Step 1. The user enters a username and password into the device.

49 Step 2. Communication starts from the mobile devices located in each organization.
 50 Each organization minimally provides APs to facilitate communication to the
 51 electronic health record server located in the Data Center. Each connection to an
 52 AP must first be challenged and responded to by the device with a proper media
 53 access control (MAC) address.

54 A MAC address cannot be changed on the physical device, but can be changed
 55 in the operating system. This makes security bypass trivial for even a low-level
 56 attacker. MAC filtering, therefore, is a first layer of defense for identity and access
 57 control

58 Step 3. The device is challenged by the AP for a properly signed and trusted certificate. If
 59 a user does not have this certificate on his device, he or she will not be allowed
 60 access on the local network to even attempt a connection to the Web-based
 61 OpenEMR.

62 In this simulation, the same certificate authority was used for both the AP and the
 63 OpenEMR tool. A hard certification could be a smart card or some other token
 64 provided by your IT department. Additional security could be added to this
 65 transaction by setting up a separately trusted CA for both and requiring a hard
 66 certification for access to either service. This approach would thwart the insider
 67 or attacker who has gained access to a lost or stolen device. They may get
 68 access to the AP, but not to the OpenEMR.

69 Step 4. The MDM performs a compliance check on the device based on the policy that
 70 was assigned.

71 Step 5. If a user has bypassed or gained access to a device using the proper MAC and
 72 certificate credentials (this assumes that the asset management policy for lost
 73 and stolen devices has not been implemented or followed in this case), the
 74 device is then challenged by the OpenEMR for additional client authentication
 75 using cryptography and a PKI based certificate (mutual authentication). The
 76 transaction is logged in the Web application and the MDM used in this build has
 77 the ability to track the specific location of a device while the log is open.

78 The user is then challenged by the OpenEMR for the proper username and
 79 password credentials. If an attacker attempts what is known as a brute force
 80 attack to gain access to the OpenEMR tool, then the likelihood that there will be a
 81 trail for an administrator to follow is higher given that the Web server application
 82 logs every attempt. The OpenEMR will also lock out the user after several log in
 83 attempts.

84 In this last step, a user with the right login credentials ultimately logs into the OpenEMR tool.

85 4 SECURITY CONTROLS ASSESSMENT

86 To demonstrate that our implementation of the security characteristics meets the business
 87 challenge, one of our collaborators, Ramparts, conducted an objective assessment of our
 88 reference design. The assessment shows that the architecture and implementation provide

89 enhanced security by ensuring that read and write access to electronic health records and
90 patient health information is limited to authorized users.

91 The assessment was not intended to be a complete test of every aspect of the functionality and
92 security of the architecture or implementation. Such an undertaking would be impractical and
93 difficult. Adapting the principles and implementation details of the reference design to an
94 organization's enterprise infrastructure requires customizations that we cannot fully anticipate.
95 Attempting to do so would potentially invalidate test results for organizations without a similar
96 implementation. We expect that organizations that adopt this reference design will build on the
97 material presented here to update their own system security plans and customize as needed to
98 validate the security of their own implementations.

99 The assessment is organized in three parts:

- 100 1. security scenario assessment – provides evidence that the reference design protects
101 the security of the patient health information in the context of several different attack
102 scenarios
- 103 2. functional assessment – provides evidence that key functions described in the
104 NCCoE use case document, "Secure Exchange of Electronic Health Information,"²
105 which originally described this challenge, are properly implemented in the build
- 106 3. security assessment – provides evidence that the security characteristics specified in
107 the use case are properly implemented in the build

108 Each assessment is described in further detail below. Section 5 of this volume contains lists of
109 tests relevant to each type of assessment, many of which were run on the build. Some tests,
110 such as those involving policy, procedure, or physical security, have been included in the
111 appendix to provide guidance in the evaluation of real, operational implementations of the
112 architecture. These tests were not performed on this reference design because they are not
113 relevant to a laboratory setting.

114 **4.1 Security Scenario Assessment**

115 The independent evaluator conducted scenario-based security testing of the reference design to
116 provide assurance that the security of health information could be maintained despite four
117 specific attacks, as outlined in the sections below. In the attack-based scenario tests, NCCoE
118 health IT architects and engineers played the roles of system administrators. During the various
119 attack scenarios, the defenders ran the network to mimic the operations of a large health care
120 organization with the resources to monitor and respond to any detected threats.

121 When testing transitioned to a new attacker scenario, the system administrators reset any
122 mitigations (technical and procedural) that were put in place. Mitigations included resetting
123 passwords but did not include blocking VPN access or the attacker's initial foothold. The test
124 procedure assumed the attacker was able to compromise an internal Windows desktop
125 computer.

² http://nccoe.nist.gov/sites/default/files/nccoe/NCCoE_HIT_MobileDevices_UseCase.pdf

126 The independent evaluator demonstrated that the use case architecture and implementation
127 provide enhanced security with respect to the goal of ensuring that only authorized users are
128 able to gain read and write access to the electronic health record system and patient health
129 information.

130 4.1.1 Lost Mobile Device Scenario

131 In this scenario, an attacker acquired a mobile health device through theft or loss. The device
132 had access to the electronic health record system at some point in time.

133 The device did not have any patient health information saved. We examined the device for
134 remnants of patient health information provided this doesn't pose a significant risk to the device.
135 In other words, we expected the device to be rooted in order to acquire a forensic image of the
136 device's disk and memory.

137 Upon discovery of the lost device, the device should be blocked from accessing any resources
138 on the Health ISP network. At a time coordinated with us, the defenders implemented a block.

139 A file or note containing example sensitive information was created and saved on the device. At
140 a time coordinated with us, the defenders initiated a remote wipe. We verified the sensitive
141 information was removed and the device wiped.

142 4.1.2 Internal Network Access Scenario

143 In this scenario, an attacker accessed the internal health ISP network. The attacker obtained
144 access to the network through a phishing campaign and maintained a persistent presence on a
145 Windows desktop computer. This persistent presence is represented by the ability to gain
146 remote access to a desktop using low-level captured Windows domain credentials. In a real-
147 world scenario, this would typically take the form of a backdoor with a network traffic redirector.

148 Through this foothold, the attacker obtained a network diagram of the health ISP. While the
149 attacker obtained access, he did not obtain system administrator credentials.

150 Testing validated the defense-in-depth strategy and demonstrated that, for many of the
151 weaknesses found, the architecture's security characteristics, such as access controls, helped
152 to limit the damage.

153 4.1.3 OpenEMR Access Scenario

154 In this scenario, an attacker accessed the OpenEMR Web application with typical user
155 credentials (e.g. receptionist, accountant). The attacker was either a malicious insider with
156 routine access to the system or an outsider who captured the user's credentials.

157 The attacker gained a foothold within the network and attempted to breach the security of
158 patient health information. As in the internal network access scenario, testing demonstrated that
159 access control helped to reduce the amount of patient health information to which the attacker
160 had access.

161 4.1.4 Physical Access Scenario

162 In this scenario, an attacker had physical access to the Data Center. We assumed the attacker
163 had unsupervised access for an extended period of time to the Data Center. The attacker was
164 able to bring in electronics and tools. The attacker connected to our access point and logged
165 and monitored network traffic. The test showed that all traffic was encrypted, thereby rendering
166 it unusable by the attacker.

167 4.2 Functional Assessment

168 An independent functional test ensured that the build provides key functions described in the
169 use case: A hypothetical primary care physician using a mobile device can securely send

- 170 • a referral from one physician to the electronic health record repository, from which a
171 second physician retrieves the referral
- 172 • a prescription to the pharmacy

173 The subsections below briefly describe the intent of each function and then describe the
174 validation and the results. The procedures used for each functional test are included in Section
175 5 of this volume.

176 4.2.1 Send a Referral

177 This test evaluated the capability of the electronic health record solution to electronically create
178 and transmit a referral to another physician. In this scenario, the receiving physician was able to
179 access the same electronic health record application as the referring physician. The receiving
180 physician got the referral and accessed the patient record via a mobile device. When treatment
181 was provided, the receiving physician updated the patient record in the electronic health record
182 application. The original referring physician was notified of the action and accessed the updated
183 patient record.

184 4.2.2 Send a Prescription

185 This test validated the electronic health record solution's prescription-sending capability. The
186 test simulated a physician using a mobile device and electronic health record application to
187 send a prescription

- 188 • to a pharmacy directly through the electronic health record application
- 189 • outside of the application via email or fax

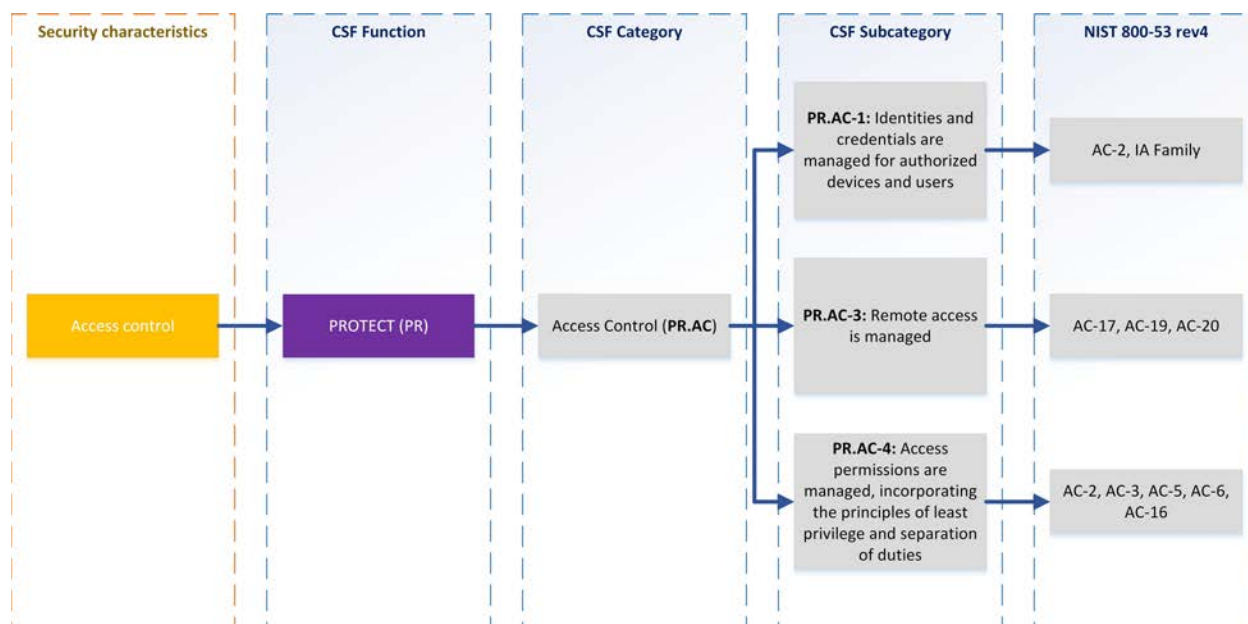
190 These actions were successfully completed.

191 4.3 Security Assessment

192 A security assessment evaluated the security characteristics that we thought were satisfied by
193 the architecture. To determine what tests to include, we consulted Table 1: *Relevant Standards
194 and Controls* in NIST SP 1800-1d: *Standards and Controls Mapping*. Five security
195 characteristic requirements are listed:

- 196 1. access control
- 197 2. audit controls/monitoring
- 198 3. device integrity
- 199 4. person or entity authentication
- 200 5. transmission security

201 In the table, each of these characteristics is further classified by the Cybersecurity Framework
202 categories and subcategories to which they map. The Cybersecurity Framework subcategories
203 were used to determine which tests to include in the security assessment by consulting the
204 specific sections of each standard that were cited in reference to that subcategory. An example
205 of the process is depicted in Figure 2.



206

207 *Figure 2: An example of the process for determining which tests to include in the security assessment.*

208 The security standards that are mapped to the Framework subcategories provided additional
 209 validation points. By systematically developing tests based on the Framework subcategories,
 210 we generated a set of reasonably comprehensive tests for the security characteristic
 211 requirements we identified when we first identified this challenge.³

212 For practical reasons, not all of these tests were run on the example build. All security
 213 assessment tests are included in Section 5 of this volume to help users evaluate their own
 214 operational implementation of the architecture and provide guidance on testing policy,
 215 procedures, and components, and other aspects of security that are relevant in an operational
 216 environment. Section 6 of this volume shows which of the tests were run on our example build,
 217 and which were not.

218 5 RISK ASSESSMENT METHODOLOGY

219 As outlined by NIST SP 800-30, organizations conduct risk assessment by executing the
 220 following tasks:

- 221
- identify threat source and events
 - 222 • identify vulnerabilities and predisposing conditions
 - 223 • determine likelihood of occurrence
 - 224 • determine magnitude of impact

³ http://nccoe.nist.gov/sites/default/files/nccoe/NCCoE_HIT_MobileDevices_UseCase.pdf

- 225 • determine risk

226 We offer two methods for conducting a risk assessment.

- 227 1) Table-driven method: by following the task list and exemplary tables that outlined the
 228 section 3.2, “*Conducting the Risk Assessment*” and the Appendices D – I in NIST SP
 229 800-30. This was the initial risk assessment for this use case, which was conducted prior
 230 to the lab architecture design and build.
- 231 2) Attack/fault-tree assessment methodology⁴: as referenced in 800-30⁵. The attack/fault
 232 tree methodology was customized for this use case. This was conducted by
 233 decomposing the architecture of the use case.

234 Both methods performed a risk assessment and an analysis against this use case for all risk
 235 factors, and then determining the risks of:

- 236 • **Loss of Confidentiality** – impact of unauthorized disclosure of sensitive information
- 237 • **Loss of Integrity** – impact if system or data integrity is lost by unauthorized changes to
 238 the data or system
- 239 • **Loss of Availability** – impact to system functionality and operational effectiveness

240 The table-driven method provides a technique for assessing the risks without using any
 241 software tools. On the other hand, the fault-tree technique, by using a Decision Programming
 242 Language (DPL) tool allows us to do a graph-based analysis and use specific threat events to
 243 generate threat scenarios. The modeling and simulation produces a large number of threat
 244 scenarios, which provides us a way to restrict the analysis on a focused subset.

245 The risk assessments determine a list of the risks and their levels of severity. The identified risks
 246 are used as the foundation for us to validate the security characteristics. The mapping to the
 247 NIST Framework for Improving Critical Infrastructure Cybersecurity (also known as the
 248 Cybersecurity Framework, or CSF) and security controls enable us to provide countermeasures
 249 by building the enterprise infrastructure with all necessary components. The organization can
 250 take actions to address those risks and protect its health information. This section provides
 251 examples on using both assessment methods and the complete assessment results can be
 252 found in Section 6 of this volume.

253 **5.1 Table-Driven Risk Assessment Example:**

254 This section provides a walkthrough for assessing and identifying

- 255 • an example adversarial risk

⁴ Ramparts LLC created and used this methodology (Ramparts Risk Assessment Methodology) on the use case. This methodology uses and maps the use case’s security characteristics into the NIST Cyber Security Framework. In addition it combines techniques pioneered in NIST SP 800-30, SP 800-53 rev4, Mission Oriented Risk and Design Analysis (MORDA) of Critical Information Systems, Risk Analysis Model (RAM) – Eight Annual Canadian Computer Security Symposium, and Intelligence-Driven Computer Network Defense informed by Analysis of Adversary Campaigns and Intrusion Kill Chains.

⁵ NIST SP 800-30, Guide for Conducting Risk Assessments, page 15, section 2.3.3 Analysis Approaches

- 256
- an example of non-adversarial risk

257 During the risk assessment process, we followed the tasks outlined in the Section 3.2
258 “*Conducting the Risk Assessment*” and use the reference tables, templates, and assessment
259 scale tables that are outlined in the Appendices D – I in NIST SP 800-30.

260 To recap, we performed the following tasks⁶:

261 Task 2-1: Identify and characterize threat sources of concern.

262 Task 2-2: Identify potential threat events.

263 Task 2-3: Identify vulnerabilities and predisposing conditions.

264 Task 2-4: Determine the likelihood.

265 Task 2-5: Determine the impact.

266 Task 2-6: Determine the risk.

267 For each task, we produced a number of intermediate tables with the outputs used by the final
268 Task 2-6 for determining the risks. The intermediate tables are omitted from this document as
269 their outputs are being aggregated into the final tables. Our assessment results are captured in
270 the following groups, with the risk level sorted from high to low.

- 271 • Adversarial Risk (Loss of Confidentiality)
- 272 • Adversarial Risk (Loss of Integrity)
- 273 • Adversarial Risk (Loss of Availability)
- 274 • Non-Adversarial Risk (Loss of Confidentiality)
- 275 • Non-Adversarial Risk (Loss of Integrity)
- 276 • Non-Adversarial Risk (Loss of Availability)

277 Refer to Section 6 *Risk Assessment Results* for the details.

278

279 The *Adversarial Risk* template table and *Non-Adversarial Risk* template table below capture the
280 assessment results for each risk factor. Following each template table, the detailed steps and
281 example walkthroughs are presented. For each step, the guide provides the details on how the
282 sample risk assessment was conducted in the column “Example Walkthrough / Explanations.”

⁶ NIST SP 800-30, Guide for Conducting Risk Assessments, page 29, Section 3.2, Conducting the Risk Assessment

283 Table 1: Adversarial Risk Template⁷

1	2	3	4	5	6	7	8	9	10	11	12	13
Threat Event	Threat Sources	Threat Source Characteristics			Relevance	Likelihood of Attack Initiation	Vulnerabilities and Predisposing Conditions	Severity and Pervasiveness	Likelihood Initiated Attack Succeeds	Overall Likelihood	Level of Impact	Risk
		Capability	Intent	Targeting								
Exploit known vulnerabilities in mobile systems and devices (e.g., laptops, PDAs, smart phones)	Adversarial/hacker	Moderate	High	Low	Possible	Moderate	Malware - TECHNICAL/ Architectural and Functional	Moderate	Moderate	Moderate	Low	Moderate

⁷ Based on NIST SP 800-30, Guide for Conducting Risk Assessments, Table I-5: Template – Adversarial Risk.

284 Table 2: Adversarial Risk Sample Walkthrough⁸

Column	Heading	Content	Example Walkthrough / Explanations
1	Threat Event	Identify threat event.	Based on the use case, one example threat event is selected: “Exploit known vulnerabilities in mobile systems and devices (e.g., laptops, PDAs, smart phones)”
2	Threat Sources	Identify threat sources that could initiate the threat event.	“Adversarial/hacker” could initiate the exploitation
3	Capability	Assess threat source capability.	The adversary has moderate resources, expertise, and opportunities to support multiple successful attacks
4	Intent	Assess threat source intent.	The adversary seeks to disrupt the organization’s cyber resources, so the source intent is “Moderate”
5	Targeting	Assess threat source targeting.	The threat source targeting is low, as attackers can only use publicly available information to target
6	Relevance	Determine relevance of threat event. If the relevance of the threat event does not meet the organization’s criteria for further consideration, do not complete the remaining columns.	The relevance of this threat event is “possible”
7	Likelihood of Attack Initiation	Determine likelihood that one or more of the threat sources initiates the threat event, taking into consideration capability, intent, and targeting.	With the moderate capability and intent and low threat source targeting, the adversary is somewhat likely to initiate the treat event, so the “Moderate” is used here

⁸ Based on NIST SP 800-30, Guide for Conducting Risk Assessments, Table I-4: Column Descriptions for Adversarial Risk Table.

8	Vulnerabilities and Predisposing Conditions	Identify vulnerabilities which could be exploited by threat sources initiating the threat event and the predisposing conditions which could increase the likelihood of adverse impacts.	Based on the vulnerabilities related to IT system and vulnerability assessments, the vulnerabilities (Malware) can be exploited by hackers by using specific products or product lines, which could increase the likelihood of adverse impacts
9	Severity Pervasiveness	Assess severity of vulnerabilities and pervasiveness of predisposing conditions.	The vulnerability is of moderate concern, based on the exposure of the vulnerability and ease of exploitation and/or on the severity of impacts that could result from its exploitation. Relevant security control or other remediation is partially implemented and somewhat effective
10	Likelihood Initiated Attack Succeeds	Determine the likelihood that the threat event, once initiated, will result in adverse impact, taking into consideration threat source capability, vulnerabilities, and predisposing conditions.	Based on the moderate threat source capability and severity pervasiveness, if the threat event is initiated or occurs, it is somewhat likely to have adverse impacts, which should be rated as "Moderate"
11	Overall Likelihood	Determine the likelihood that the threat event will be initiated and result in adverse impact (i.e., combination of likelihood of attack initiation and likelihood that initiated attack succeeds).	The overall likelihood is the combination of likelihood of attack initiation (Column 7, Moderate) and likelihood that initiated attack succeeds (Column 10, Moderate). By checking Table 5: Assessment Scale – Overall Likelihood , the Overall Likelihood is Moderate.
12	Level of Impact	Determine the adverse impact (i.e., potential harm to organizational operations, organizational assets, individuals, other organizations, or the Nation) from the threat event.	With this threat event, it is potentially harm to organizational operations. This threat event could be expected to have a serious adverse effect on organization operations, as the mobile system and / or mobile devices might loss the availability. The level of impact is Moderate.
13	Risk	Determine the level of risk as a combination of likelihood and impact.	The level of risk is a combination of likelihood (Column 11, Moderate) and impact (Column12, Moderate). By checking Table 6: Assessment Scale – Level of Risk (combination of likelihood and impact) , the Level of Risk is Moderate.

285 Table 3: Non-Adversarial Risk Template⁹

1	2	3	4	5	6	7	8	9	10	11
Threat Event	Threat Sources	Range of Effects	Relevance	Likelihood of Event Occurring	Vulnerabilities and Predisposing Conditions	Severity and Pervasiveness	Likelihood Event Results in Adverse Impact	Overall Likelihood	Level of Impact	Risk
Incorrect privilege settings	Accidental (users, admin users)	Moderate	Predicted	Moderate	INFORMATION-RELATED/Special Access Programs	Moderate	High	Moderate	Moderate	Low

286

287 Table 4: Non-Adversarial Risk Sample Walkthrough¹⁰

Column	Heading	Content	Example Walkthrough / Explanations
1	Threat Event	Identify threat event.	Based on the use case, one example threat event is selected: “Incorrect privilege settings”
2	Threat Sources	Identify threat sources that could initiate the threat event.	“Accidental (users, admin users)” could initiate the exploitation

⁹ Based on NIST SP 800-30, Guide for Conducting Risk Assessments, Table I-7: Template – Non-Adversarial Risk.

¹⁰ Based on NIST SP 800-30, Guide for Conducting Risk Assessments, Table I-6: Column Descriptions for Non-Adversarial Risk Table.

3	Range of Effects	Identify the range of effects from the threat source.	The effects of the accident are wide-ranging, involving a significant portion of the cyber resources of the information systems including some critical resources. So the “Moderate” is used here
4	Relevance	Determine relevance of threat event. If the relevance of the threat event does not meet the organization’s criteria for further consideration, do not complete the remaining columns.	The relevance of this threat event is “Predicted”
5	Likelihood of Threat Event Occurring	Determine the likelihood that the threat event will occur.	Accident is somewhat likely to occur; so the “Moderate” is used here
6	Vulnerabilities and Predisposing Conditions	Identify vulnerabilities which could be exploited by threat sources initiating the threat event and the predisposing conditions which could increase the likelihood of adverse impacts.	Based on the vulnerabilities related to IT system and vulnerability assessments, the vulnerabilities (related to incorrect privilege settings) can be exploited by accidentally by users, which could increase the likelihood of adverse impacts
7	Severity Pervasiveness	Assess severity of vulnerabilities and pervasiveness of predisposing conditions.	The vulnerability is of moderate concern, based on the exposure of the vulnerability and ease of exploitation and/or on the severity of impacts that could result from its exploitation. Relevant security control or other remediation is partially implemented and somewhat effective.
8	Likelihood Threat Event Results in Adverse Impact	Determine the likelihood that the threat event, once initiated, will result in adverse impact, taking into consideration vulnerabilities and predisposing conditions.	Based on the moderate treat source capability and severity pervasiveness, if the threat event is initiated or occurs, it is highly likely to have adverse impacts, which should be rated as “High”
9	Overall Likelihood	Determine the likelihood that the threat event will occur and result in adverse impacts (i.e., combination of likelihood of threat occurring and likelihood that the threat event results in adverse impact).	The likelihood that the threat event will occur and result in adverse impacts is the combination of likelihood of threat occurring (Column 5, Moderate) and likelihood that the threat event results in adverse impact (Column 8, High). By checking Table 5: Assessment Scale – Overall Likelihood , the Overall Likelihood is Moderate.

10	Level of Impact	Determine the adverse impact (i.e., potential harm to organizational operations, organizational assets, individuals, other organizations, or the Nation) from the threat event.	With this threat event, it is potentially harm to organizational operations and information related special access program. This threat event could be expected to have a serious adverse effect on organization operations, as the mobile system and / or mobile devices might loss the availability. The level of impact is Moderate.
13	Risk	Determine the level of risk as a combination of likelihood and impact.	The level of risk is a combination of likelihood (Column 9, Moderate) and impact (Column 10, Moderate). By checking Table 6: Assessment Scale – Level of Risk (combination of likelihood and impact) , the Level of Risk is Moderate.

288 Table 5: Assessment Scale – Overall Likelihood¹¹

Likelihood of Threat Event Initiation or Occurrence	Likelihood Threat Events Result in Adverse Impacts				
	Very Low	Low	Moderate	High	Very High
Very High	Low	Moderate	High	Very High	Very High
High	Low	Moderate	Moderate	High	Very High
Moderate	Low	Low	Moderate	Moderate	High
Low	Very Low	Low	Low	Moderate	Moderate
Very Low	Very Low	Very Low	Low	Low	Low

¹¹ Based on NIST 800-30, Guide for Conducting Risk Assessments, Table G-5: Assessment Scale – Overall Likelihood.

289 Table 6: Assessment Scale – Level of Risk (combination of likelihood and impact)¹²

Likelihood (Threat Event Occurs and Results in Adverse Impact)	Level of Impact				
	Very Low	Low	Moderate	High	Very High
Very High	Very Low	Low	Moderate	High	Very High
High	Very Low	Low	Moderate	High	Very High
Moderate	Very Low	Low	Moderate	Moderate	High
Low	Very Low	Low	Low	Low	Moderate
Very Low	Very Low	Very Low	Very Low	Low	Low

¹² Based on NIST 800-30, Guide for Conducting Risk Assessments, Table I-2: Assessment Scale – Level of Risk (Combination of Likelihood and Impact).

290 5.2 Ramparts' Attack/Fault-Tree-Driven Risk Assessment Example

291 NIST worked with Ramparts, LLC to perform a risk assessment using attack/fault trees. The
292 methodology allowed us to identify and prioritize the impacts of the attack events. Prioritizing the
293 impacts of the attack event focused our attack-based scenario testing, countermeasure
294 implementation and countermeasure development.

295 When selecting the analysis approach, graph-based analysis provides an effective way to
296 account for the many-to-many relationships between:

- 297 (i) threat sources and threat events,
- 298 (ii) threat events and vulnerabilities, and
- 299 (iii) threat events and impacts/assets.

300 Steps:

301 The steps involved in Ramparts' attack/fault tree risk assessment methodology are the
302 following:

- 303 1. Scope the Risk Assessment (Define the Potential Harm, Security Characteristics, Critical
304 Data Assets, and map to NIST Cyber Security Framework.)
- 305 2. Create Attack Event Trees (Threat Scenarios) that target the Security Characteristics
306 and Critical Data Assets
- 307 3. Assign Countermeasures/Safeguards
- 308 4. Assign Likelihood of Occurrence of the Security Characteristics being compromised
309 based on the Industry's Primary Adversaries
- 310 5. Analysis and Present Results (Identify where the greatest relative risk to the system
311 resides and where future efforts to minimize the risk should be placed.)

312 Step-1: Scoping the Risk Assessment

313 The CSF is being used to communicate the scope of this risk assessment. The Potential Harm
314 at its highest level has been defined as risk to the confidentiality, integrity, and availability of
315 patient health information. The security characteristics as defined in Table 2 are mapped into the
316 CSF and other standards.

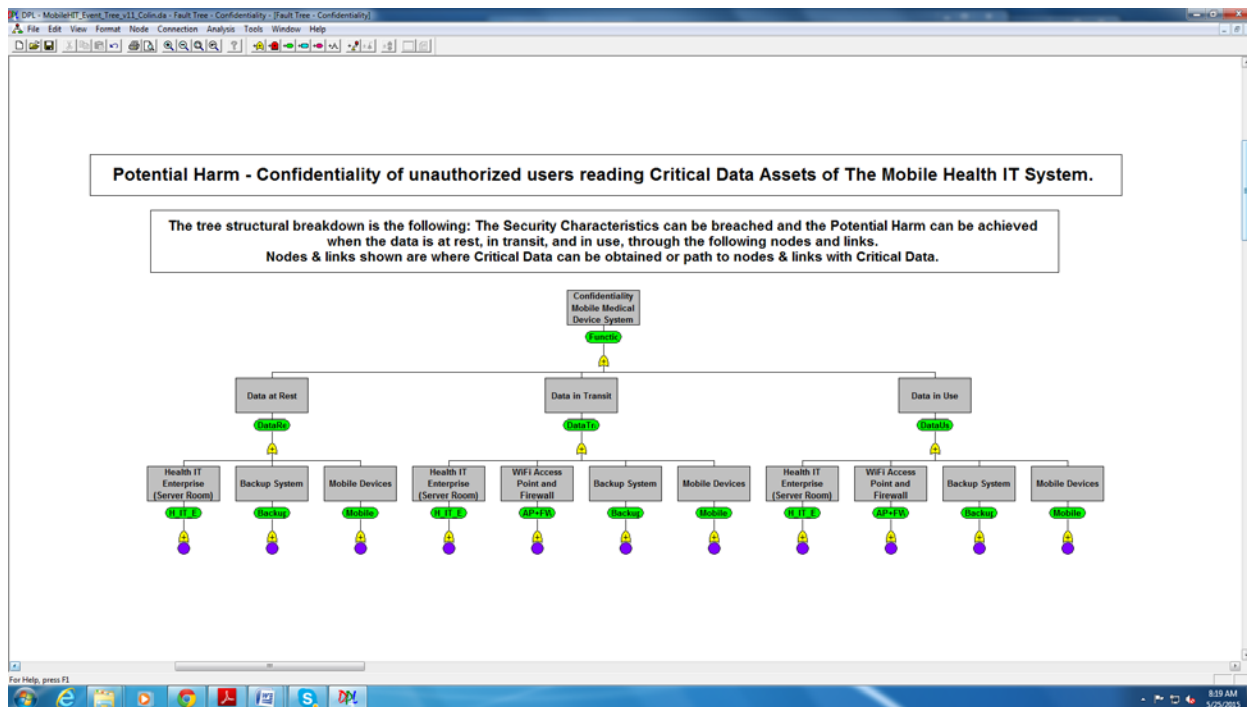
317 Step-2: Create Attack Event Trees (Attack Scenarios) with Countermeasures and Safeguards

318 The potential attack events are developed using event trees. We define a logical structure
319 where the lower level events can be given a likelihood of occurrence. A logical structure will also
320 allow security experts with different specialties to more easily review and contribute to the
321 assessment. The event nodes were decomposed to a level where a likelihood of occurrence
322 could be assigned. The events in an attack scenario that need to occur in parallel to be
323 successful are AND'ed together. The events that can happen in parallel are OR'ed together.

324 The logical structure for of the attack event trees chosen for this use case was the following:

- 325 1. A separate attack tree was created for three potential harms to confidentiality, integrity
326 and availability
- 327 2. At the top of each tree the potential harm was defined, as the risk being modeled and
328 measured
- 329 3. The second layer of the tree was modeled as data at rest, data in transit, and data in use

330 4. At the third layer modeled the devices and data nodes of the system. Reference the
 331 confidentiality attack tree below



332 Step-3: Assign Countermeasures/Safeguards
 333

334 The countermeasures/safeguards detailed in *NIST SP 1800-1b: Approach, Architecture, and*
 335 *Security Characteristics*, sections 4 and 5, as appropriate, were assigned to the low level attack
 336 events.

337 As an example, up to date antivirus software running on the mobile device was assigned when
 338 modeling the “Install File Copying Malware” event. Then this countermeasure was part of the
 339 consideration in assigning the Likelihood of Occurrence (step 4).

340 Step-4: Assign Likelihood of Occurrence at the lowest level attack event that will cause the
 341 Security Characteristics being compromised) based on the Industry’s Primary Adversaries

342 The likelihood of occurrence is assigned as Very High, High, Medium-High, Medium, Low-
 343 Medium, Low, and Very Low. When getting expert opinions as input, this level of granularity
 344 might be too detailed, so a High, Medium, and Low relative qualitative scale could have been
 345 used instead.

346 The following scale of likelihoods was used:

Value	Qualitative Numeric Value
Low	.01
Medium Low	.1
Medium	.5
Medium High	.75

High	.9
------	----

347

348 The qualitative numeric values are used within the event trees to calculate probabilities at the
 349 higher levels of the trees. This was used to assess whether particular attack scenarios are more
 350 likely to occur.

351 The following criteria are being used when assigning a likelihood of occurrence values to the
 352 low level event (leaf) of the attack tree:

353 1. The adversary's likelihood of success. This success criterion considers the protection
 354 countermeasures deployed in the system, the complexity of the event and the availability
 355 of known exploits.

356

357 2. The adversary's likelihood of not being detected. Not all detections are created equal.
 358 Where appropriate, the seven stages in the Kill Chain model are considered. Detection
 359 during the reconnaissance stage (early in the attack) may be much more advantageous
 360 than detection during the Actions on Objectives stage (late in the attack). Obviously
 361 when the adversary has been able to egress critical data for months or years, and may
 362 have established other accesses into the system, the damage could be much greater.
 363 The detection countermeasures deployed in the system are considered for the detection
 364 criteria.

365

366 3. The adversary's resources required. The costs to the adversary in time and money is
 367 given a qualitative value for the event. Borrowing from MORDA (Mission Oriented Risk
 368 and Design Analysis) the following scale was used:

369

• Value	• Range
• Free	• 0-\$1,000
• Very Low	• \$1,000 -\$10,000
• Low	• \$10,000 - \$100,000
• Medium	• \$100,000 - \$1 Million
• High	• \$1 Million - \$10 Million
• Very High	• >\$10 Million

370

371 The assumption we used for this assessment was that the attacks that the potential adversaries
 372 would use are in the Very Low to Free resource levels.

373

374

375 4. When coming up with a single qualitative value to assign to the attack tree event, start
 376 with the likelihood of success, followed by the likelihood of detection, then the
 377 adversary's resources required.

378 Understand that if an event is scored with a Low adversary's likelihood of success, it is
 379 still important to consider the adversary's likelihood of not being detected. A detection
 380 countermeasure(s) can help to protect the critical data from zero day attacks
 381 (unknown/unreported/unpatched attacks) and minimize the potential damage from all
 382 successful attacks on the critical data.

383 This assessment is giving equal weight to the adversary's likelihood of success and not
 384 being detected. One goal of any organization providing good security is to make the
 385 resources an adversary would need to accomplish their cost prohibitive objective. For
 386 this assessment we have assumed those same low level resources for all attack
 387 scenarios.

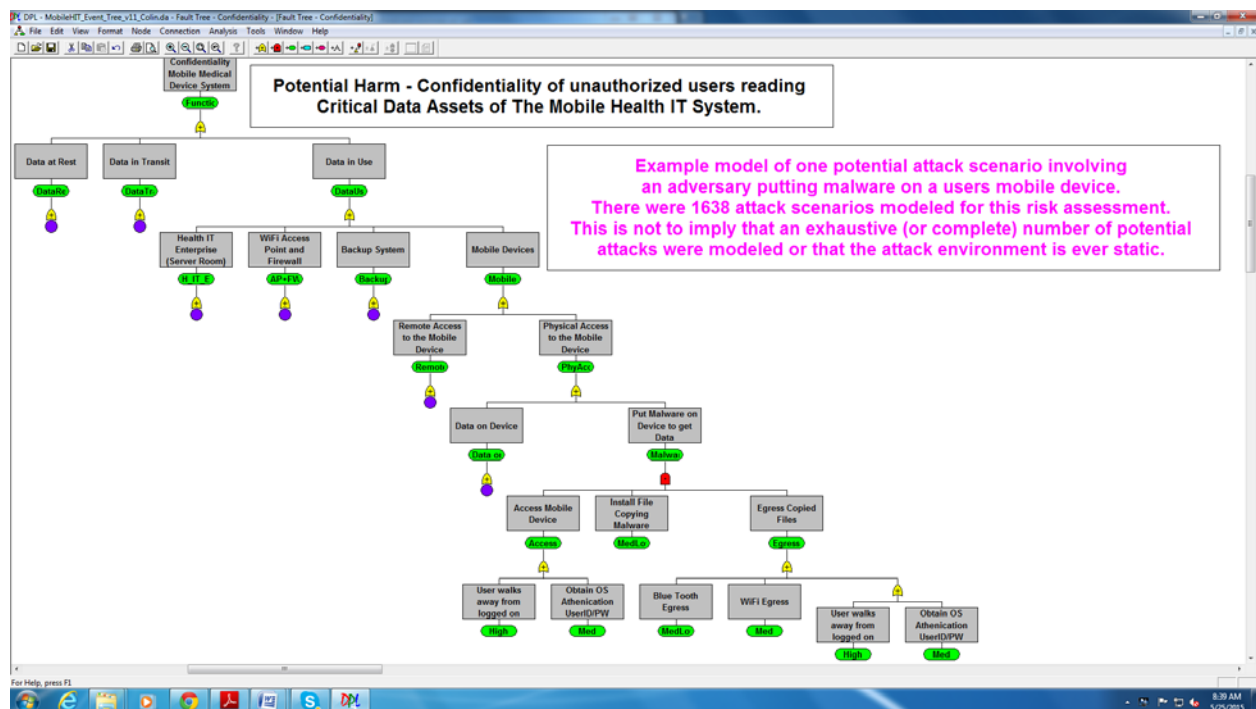
388 The table below shows how the three types of "Adversary Likelihoods" can be combined
 389 to come up with a single value for the Assigned Likelihood of Occurrence.

<u>Event</u>	<u>Adversary's Likelihood of Success</u>	<u>Adversary's Likelihood of Not being Detected</u>	<u>Adversary's Resources Required</u>	<u>Assigned Likelihood of Occurrence Value</u>
A	Very Low	Very Low	Free/Very Low	Very Low
B	Very Low	Low	Free/Very Low	Low
C	Very Low	Medium	Free/Very Low	Low-Medium
D	Very Low	High	Free/Very Low	Medium
E	Very Low	Very High	Free/Very Low	Medium-High
F	Low	Very Low	Free/Very Low	Low
G	Low	Low	Free/Very Low	Low
H	Low	Medium	Free/Very Low	Low-Medium
I	Low	High	Free/Very Low	Medium
J	Low	Very High	Free/Very Low	Medium-High
K	Medium	Very Low	Free/Very Low	Low-Medium
L	Medium	Low	Free/Very Low	Low-Medium
M	Medium	Medium	Free/Very Low	Medium
N	Medium	High	Free/Very Low	Medium-High
O	Medium	Very High	Free/Very Low	Medium-High
P	High	Very Low	Free/Very Low	Medium
Q	High	Low	Free/Very Low	Medium

R	High	Medium	Free/Very Low	Medium-High
S	High	High	Free/Very Low	High
T	High	Very High	Free/Very Low	Very High
U	Very High	Very Low	Free/Very Low	Medium
V	Very High	Low	Free/Very Low	Medium
W	Very High	Medium	Free/Very Low	Medium-High
X	Very High	High	Free/Very Low	High
Y	Very High	Very High	Free/Very Low	Very High

390

391 See below for one complete attack branch (scenario). This branch shows the attack for Data in
 392 Use, Physical Access to the mobile Device and Putting Malware on Device to get Data.



393

394 Step 5: Analysis and Present Results

395 Using established reliability probability theory, where the events in the tree structure that are
 396 OR'ed together (those that can happen in parallel) can have their probabilities represented as P
 397 $= 1 - (1 - p_2)(1 - p_3)$, which is 1 minus the probability that both event2 and event3 have been
 398 accomplished by an adversary. Events AND'ed together (those that are sequential) can be
 399 represented as $P = p_4 * p_5$ which is the probably that neither event4 nor event5 had been
 400 accomplished.

401 In the complex attack tree structure that was modeled the following analytics were run and
 402 results used:

403 1) Partial derivatives were used to show where changes to the low level attack events
404 would have the greatest impact.

405 2) Calculated minimal cut sets gave the total number of attacks that were modeled.

406 An in-depth discussion of analytics used can be found in “Risk Analysis Model (RAM) – Eight
407 Annual Canadian Computer Security Symposium”.

408 The risk assessment methodology used here will typically be used to effectively and efficiently
409 focus the evidence-based vulnerability testing used by system implementers & countermeasure
410 developers, and as shown below input into a risk management system/framework.

411 **6 RISK ASSESSMENT RESULTS**

412 **6.1 Table-Driven Risk Assessment Results**

413 *Table 7: Table-Driven Results – Adversarial Risk based on Confidentiality*

1	2	3	4	5	6	7	8	9	10	11	12	13	
Threat Event	Threat Sources	Threat Source Characteristics			Relevance	Likelihood of Attack Initiation	Vulnerabilities and Predisposing Conditions	Severity and Pervasiveness	Likelihood Initiated Attack Succeeds	Overall Likelihood	Level of Impact	Risk	Risk Score
		Capability	Intent	Targeting									
System intrusion and unauthorized system access	Adversarial/hacker	Moderate	High	High	Possible	Moderate	Possible weak passwords due to lack of password complexity control	High	High	High	Very High	Very High	10
Obtain sensitive information through network sniffing of external networks.	Adversarial/hacker	Low	Moderate	Moderate	Predicted	Moderate	Inadequate incorporation of security into architecture and design	Moderate	High	High	Very High	Very High	10
Stolen mobile devices	Adversarial/hacker	High	High	High	Confirmed	High	Lack of user training and physical security	High	High	High	High	High	8

Conduct communications interception attacks.	Adversarial/hacker	Low	High	Moderate	Possible	Moderate	Lack of transmission encryption leading to interception of unencrypted data	High	High	High	High	High	8
Cause integrity loss by creating, deleting, and/or modifying data on publicly accessible information systems (e.g., Web defacement).	Adversarial/hacker	Moderate	Moderate	Moderate	Predicted	Moderate	Inadequate access control and / or enforcement Inadequate data retention, backup and recovery	Moderate	Moderate	High	High	High	8
Exploit known vulnerabilities in mobile systems (e.g., laptops, PDAs, smart phones)	Adversarial/hacker	Moderate	High	High	Possible	High	Malware - TECHNICAL/Architectural and Functional	Moderate	Moderate	Moderate	High	Moderate	5
Deliver/insert/install malicious capabilities.	Adversarial/hacker	Moderate	High	Moderate	Anticipated	Moderate	Inadequate incorporation of security into architecture and design	Moderate	Moderate	Moderate	High	Moderate	5
Conduct an attack (i.e., direct/coordinate attack tools or activities).	Adversarial/hacker	Moderate	Moderate	Moderate	Anticipated	Moderate	Inadequate incorporation of security into architecture and design	Moderate	Moderate	Moderate	Moderate	Moderate	5

415 Table 8: Table-Driven Results – Adversarial Risk based on Integrity

1	2	3	4	5	6	7	8	9	10	11	12	13	
Threat Event	Threat Sources	Threat Source Characteristics			Relevance	Likelihood of Attack Initiation	Vulnerabilities and Predisposing Conditions	Severity and Pervasiveness	Likelihood Initiated Attack Succeeds	Overall Likelihood	Level of Impact	Risk	Risk Score
		Capability	Intent	Targeting									
Cause integrity loss by creating, deleting, and/or modifying data on publicly accessible information systems (e.g., Web defacement).	Adversarial/hacker	Moderate	Moderate	Moderate	Predicted	Moderate	Inadequate access control and / or enforcement Inadequate data retention, backup and recovery	Moderate	Moderate	High	Very High	Very High	10
Stolen mobile devices	Adversarial/hacker	High	High	High	Confirmed	High	Lack of user training and physical security	High	High	High	High	High	∞
Exploit known vulnerabilities in mobile systems (e.g., laptops, PDAs, smart phones)	Adversarial/hacker	Moderate	High	High	Possible	High	Malware - TECHNICAL/Architectural and Functional	Moderate	Moderate	Moderate	High	High	∞

System intrusion and unauthorized system access	Adversarial/hacker	Moderate	High	High	Possible	Moderate	Possible weak passwords due to lack of password complexity control	High	High	High	Moderate	Moderate	8
Conduct communications interception attacks.	Adversarial/hacker	Low	High	Moderate	Possible	Moderate	Lack of transmission encryption leading to interception of unencrypted data	High	High	High	High	High	8
Conduct an attack (i.e., direct/coordinate attack tools or activities).	Adversarial/hacker	Moderate	Moderate	Moderate	Anticipated	Moderate	Inadequate incorporation of security into architecture and design	Moderate	Moderate	Moderate	High	High	8
Obtain sensitive information through network sniffing of external networks.	Adversarial/hacker	Low	Moderate	Moderate	Predicted	Moderate	Inadequate incorporation of security into architecture and design	Moderate	High	High	High	High	8
Deliver/insert/install malicious capabilities.	Adversarial/hacker	Moderate	High	Moderate	Anticipated	Moderate	Inadequate incorporation of security into architecture and design	Moderate	Moderate	Moderate	High	Moderate	5

417 Table 9: Table-Driven Results – Adversarial Risk based on Availability

1	2	3	4	5	6	7	8	9	10	11	12	13	
Threat Event	Threat Sources	Threat Source Characteristics			Relevance	Likelihood of Attack Initiation	Vulnerabilities and Predisposing Conditions	Severity and Pervasiveness	Likelihood Initiated Attack Succeeds	Overall Likelihood	Level of Impact	Risk	Risk Score
		Capability	Intent	Targeting									
Stolen mobile devices	Adversarial/hacker	High	High	High	Confirmed	High	Lack of user training and physical security	Moderate	Moderate	High	High	High	∞
Exploit known vulnerabilities in mobile systems (e.g., laptops, PDAs, smart phones)	Adversarial/hacker	Moderate	High	High	Possible	High	Malware - TECHNICAL/Architectural and Functional	Moderate	Moderate	Moderate	High	High	∞
Cause integrity loss by creating, deleting, and/or modifying data on publicly accessible information systems (e.g., Web defacement).	Adversarial/hacker	Moderate	Moderate	Moderate	Predicted	Moderate	Inadequate access control and /or enforcement Inadequate data retention, backup and recovery	Moderate	Moderate	High	High	High	∞

System intrusion and unauthorized system access	Adversarial/hacker	Moderate	High	High	Possible	Moderate	Possible weak passwords due to lack of password complexity control	Moderate	Moderate	Moderate	High	Moderate	5
Conduct communications interception attacks.	Adversarial/hacker	Low	High	Moderate	Possible	Moderate	Lack of transmission encryption leading to interception of unencrypted data	Moderate	Moderate	Moderate	High	Moderate	5
Deliver/insert/install malicious capabilities.	Adversarial/hacker	Moderate	High	Moderate	Anticipated	Moderate	Inadequate incorporation of security into architecture and design	Moderate	Moderate	Moderate	High	Moderate	5
Obtain sensitive information through network sniffing of external networks.	Adversarial/hacker	Low	Moderate	Moderate	Predicted	Moderate	Inadequate incorporation of security into architecture and design	Moderate	Low	Moderate	Moderate	Moderate	5
Conduct an attack (i.e., direct/coordinate attack tools or activities).	Adversarial/hacker	Moderate	Moderate	Moderate	Anticipated	Moderate	Inadequate incorporation of security into architecture and design	Moderate	Low	Low	Moderate	Low	2

419 Table 10: Table-Driven Results – Non-Adversarial Risk based on Confidentiality

1	2	3	4	5	6	7	8	9	10	11	
Threat Event	Threat Sources	Range of Effects	Relevance	Likelihood of Event Occurring	Vulnerabilities and Predisposing Conditions	Severity and Pervasiveness	Likelihood Event Results in Adverse Impact	Overall Likelihood	Level of Impact	Risk	Risk Score
Spill sensitive information	Accidental (users, admin users)	Moderate	Predicted	Low	Inadequate user training Untraceable user actions	Moderate	Very High	Very High	Very High	Very High	10
Lost mobile device	Accidental (users)	Very Low	Confirmed	Moderate	INFORMATION-RELATED/Special Access Programs	Moderate	High	High	High	High	8
Incorrect privilege settings	Accidental (users, admin users)	High	Predicted	Moderate	INFORMATION-RELATED/Special Access Programs	Moderate	High	Moderate	High	High	8
Mishandling of critical and/or sensitive information by authorized users	Accidental (users, admin users)	High	Predicted	Low	Inadequate user training Untraceable user actions	Moderate	Very High	Moderate	High	High	8
Walks away from logged-on devices	Accidental (users)	Low	Confirmed	Moderate	Inadequate user training	Moderate	High	Moderate	Moderate	Moderate	5

Downloads viruses or other malware	Accidental (users)	Low	Confirmed	Moderate	Inadequate user training Lack of policy enforcement In adequate configuration management	Moderate	Moderate	Moderate	Moderate	Moderate	Moderate	5
Uses an unsecure Wi-Fi network	Accidental (users)	Very Low	Confirmed	High	Inadequate user training	Low	Moderate	Moderate	Moderate	Moderate	Moderate	5
Introduction of vulnerabilities into software products	STRUCTURAL (Software)	High	Expected	Moderate	Inadequate change management and/or configuration management	High	Moderate	Moderate	Moderate	Moderate	Moderate	5
Weak Access Control	Accidental (users, admin users)	High	Predicted	Moderate	Inadequate access control and/or enforcement	High	Moderate	Moderate	Moderate	Moderate	Moderate	5
Disk error	STRUCTURAL (IT Equipment)	High	Expected	Moderate	Lack of environmental controls	Moderate	Low	Low	Moderate	Low	Moderate	2

420

421 Table 11: Table-Driven Results – Non-Adversarial Risk based on Integrity

1	2	3	4	5	6	7	8	9	10	11	
Threat Event	Threat Sources	Range of Effects	Relevance	Likelihood of Event Occurring	Vulnerabilities and Predisposing Conditions	Severity and Pervasiveness	Likelihood Event Results in Adverse Impact	Overall Likelihood	Level of Impact	Risk	Risk Score
Mishandling of critical and/or sensitive information by authorized users	Accidental (users, admin users)	High	Predicted	Low	Inadequate user training Untraceable user actions	Moderate	Very High	Very High	Very High	Very High	10
Spill sensitive information	Accidental (users, admin users)	Moderate	Predicted	Low	Inadequate user training Untraceable user actions	Moderate	Very High	High	High	High	8
Lost mobile device	Accidental (users)	Very Low	Confirmed	Moderate	INFORMATION-RELATED/Special Access Programs	Moderate	High	High	High	High	8
Incorrect privilege settings	Accidental (users, admin users)	High	Predicted	Moderate	INFORMATION-RELATED/Special Access Programs	Moderate	High	Moderate	High	High	8
Walks away from logged-on devices	Accidental (users)	Low	Confirmed	Moderate	Inadequate user training	Moderate	High	Moderate	Moderate	Moderate	5

Downloads viruses or other malware	Accidental (users)	Low	Confirmed	Moderate	Inadequate user training Lack of policy enforcement Inadequate configuration management	Moderate	Moderate	Moderate	Moderate	Moderate	5
Uses an unsecure Wi-Fi network	Accidental (users)	Very Low	Confirmed	High	Inadequate user training	Low	Moderate	Moderate	Moderate	Moderate	5
Introduction of vulnerabilities into software products	STRUCTURAL (Software)	High	Expected	Moderate	Inadequate change management and/or configuration management	High	Moderate	Moderate	Moderate	Moderate	5
Weak Access Control	Accidental (users, admin users)	High	Predicted	Moderate	Inadequate access control and/or enforcement	High	Moderate	Moderate	Moderate	Moderate	5
Disk error	STRUCTURAL (IT Equipment)	High	Expected	Moderate	Lack of environmental controls	Moderate	Low	Low	Moderate	Low	2

422

423

424 Table 12: Table-Driven Results – Non-Adversarial Risk based on Availability

1	2	3	4	5	6	7	8	9	10	11	
Threat Event	Threat Sources	Range of Effects	Relevance	Likelihood of Event Occurring	Vulnerabilities and Predisposing Conditions	Severity and Pervasiveness	Likelihood Event Results in Adverse Impact	Overall Likelihood	Level of Impact	Risk	Risk Score
Lost mobile device	Accidental (users)	Very Low	Confirmed	Moderate	INFORMATION-RELATED/Special Access Programs	Moderate	Very High	Very High	Very High	Very High	10
Mishandling of critical and/or sensitive information by authorized users	Accidental (users, admin users)	High	Predicted	Low	Inadequate user training Untraceable user actions	Moderate	High	High	High	High	∞
Spill sensitive information	Accidental (users, admin users)	Moderate	Predicted	Low	Inadequate user training Untraceable user actions	Moderate	Very High	High	High	High	∞
Downloads viruses or other malware	Accidental (users)	Low	Confirmed	Moderate	Inadequate user training Lack of policy enforcement Inadequate configuration management	Moderate	Moderate	High	High	High	∞
Introduction of vulnerabilities into software products	STRUCTURAL (Software)	High	Expected	Moderate	Inadequate change management and/or configuration management	High	Moderate	High	High	High	∞

Disk error	STRUCTURAL (IT Equipment)	High	Expected	Moderate	Lack of environmental controls	Moderate	Low	High	High	High	8
Incorrect privilege settings	Accidental (users, admin users)	High	Predicted	Moderate	INFORMATION-RELATED/Special Access Programs	Moderate	High	Moderate	Moderate	Moderate	5
Walks away from logged-on devices	Accidental (users)	Low	Confirmed	Moderate	Inadequate user training	Moderate	High	Moderate	Moderate	Moderate	5
Uses an unsecure Wi-Fi network	Accidental (users)	Very Low	Confirmed	High	Inadequate user training	Low	Moderate	Moderate	Moderate	Moderate	5
Weak Access Control	Accidental (users, admin users)	High	Predicted	Moderate	Inadequate access control and/or enforcement	High	Moderate	Moderate	Moderate	Moderate	5

425 **6.2 Fault-Tree Risk Assessment Results**426 *Table 13: Fault-Tree Results Based on Confidentiality*

Partial Derivative	Probability	Maximum Impact	Event
0.0715	0.9	0.0644	User_walks_away_from_logged_on_Mobile_Device1
0.0715	0.9	0.0644	User_walks_away_from_logged_on_Mobile_Device54
0.00732	0.1	0.000732	Install_File_Copying_Malware
0.00732	0.1	0.000732	Install_File_Copying_Malware551
0.000385	0.9	0.000347	User_walks_away_from_logged_on_Mobile_Device443
0.000385	0.9	0.000347	User_walks_away_from_logged_on_Mobile_Device554
0.000604	0.5	0.000302	Mobile_Device_User_Does_Not_Notice
0.00302	0.1	0.000302	Connect_as_OpenEMR2
0.000335	0.9	0.000302	Ask_Receive_Critical_Data_from_the_User1
0.000335	0.9	0.000302	Disconnect_OpenEMR
0.000169	0.9	0.000152	User_walks_away_from_logged_on_Mobile_Device442
0.000169	0.9	0.000152	User_walks_away_from_logged_on_Mobile_Device555
7.22E-05	0.9	6.50E-05	Steal_Media2
0.0065	0.01	6.50E-05	Decrypt_Critical_Data11
7.22E-05	0.9	6.50E-05	Steal_Media40
0.0065	0.01	6.50E-05	Decrypt_Critical_Data440
0.0065	0.01	6.50E-05	Decrypt_Critical_Data554
7.22E-05	0.9	6.50E-05	Steal_Media54
6.51E-05	0.9	5.86E-05	PluginHub
0.00586	0.01	5.86E-05	Decrypt_Critical_Data443
6.51E-05	0.9	5.86E-05	PluginHub54
0.00586	0.01	5.86E-05	Decrypt_Critical_Data534
6.33E-05	0.9	5.70E-05	Laptop_Wireshark2
6.33E-05	0.9	5.70E-05	Laptop_Wireshark54
0.00396	0.01	3.96E-05	Decrypt_Backup_Data_at_Rest25
0.00396	0.01	3.96E-05	Decrypt_Backup_Data_at_Rest544
7.71E-05	0.5	3.85E-05	Obtain_OS_Authentication443
7.71E-05	0.5	3.85E-05	Obtain_OS_Authentication555

0.00359	0.01	3.59E-05	Decrypt_the_Back_up4
0.00359	0.01	3.59E-05	Decrypt_the_Back_up54
7.19E-05	0.5	3.59E-05	During_Physical_Transfer_Obtain_Copy54
7.19E-05	0.5	3.59E-05	During_Physical_Transfer_Obtain_Copy1
6.47E-05	0.5	3.24E-05	Obtain_a_copy_of_the_backup
6.47E-05	0.5	3.24E-05	Obtain_a_copy_of_the_backup54
3.37E-05	0.5	1.69E-05	WiFi_Egress442
3.37E-05	0.5	1.69E-05	WiFi_Egress54
3.37E-05	0.5	1.69E-05	Obtain_OS_Authentication442
3.37E-05	0.5	1.69E-05	Obtain_OS_Authentication55
3.23E-05	0.5	1.61E-05	Send_Data_to_New_GW
3.23E-05	0.5	1.61E-05	Acquire_Password2
0.00161	0.01	1.61E-05	Decrypt_Critical_Data16
3.23E-05	0.5	1.61E-05	Acquire_Password54
1.79E-05	0.9	1.61E-05	Capture_Critical_Data2
3.23E-05	0.5	1.61E-05	Send_Data_to_New_GW54
0.00161	0.01	1.61E-05	Decrypt_Critical_Data1554
1.79E-05	0.9	1.61E-05	Capture_Critical_Data554
0.000135	0.1	1.35E-05	Critical_Data_is_Resident_on_the_Mobile_Device
0.000135	0.1	1.35E-05	Critical_Data_is_Resident_on_the_Mobile_Device54
0.00114	0.01	1.14E-05	Decrypt_Critical_Data338
0.00114	0.01	1.14E-05	Decrypt_Critical_Data339
0.00114	0.01	1.14E-05	Decrypt_Critical_Data7
0.00114	0.01	1.14E-05	Decrypt_Critical_Data5
0.00114	0.01	1.14E-05	Decrypt_Critical_Data552
0.00114	0.01	1.14E-05	Decrypt_Critical_Data53
0.00088	0.01	8.80E-06	Decrypt_Critical_Data35
0.00088	0.01	8.80E-06	Decrypt_Critical_Data40
0.00088	0.01	8.80E-06	Decrypt_Critical_Data54
1.02E-05	0.75	7.67E-06	Thumb_Drive40
1.02E-05	0.75	7.67E-06	Thumb_Drive
1.02E-05	0.75	7.67E-06	Thumb_Drive54

0.000716	0.01	7.16E-06	Blue_Tooth_Access
7.16E-05	0.1	7.16E-06	Critical_Data_residue_on_Mobile_device2
7.16E-05	0.1	7.16E-06	Gain_Access_to_the_Backup_System1
0.000716	0.01	7.16E-06	Decrypt_Backup_Data_at_Rest21
0.000716	0.01	7.16E-06	Blue_Tooth_Access454
7.16E-05	0.1	7.16E-06	Backup_data_Captured1
7.16E-05	0.1	7.16E-06	Critical_Data_residue_on_Mobile_device454
7.16E-05	0.1	7.16E-06	Gain_Access_to_the_Backup_System54
0.000716	0.01	7.16E-06	Decrypt_Data20
7.16E-05	0.1	7.16E-06	Backup_data_Captured54
0.000716	0.01	7.16E-06	Decrypt_Data54
0.000716	0.01	7.16E-06	Decrypt_Backup_Data_at_Rest54
0.000674	0.01	6.74E-06	Remote_Access_to_the_MDM1
0.000674	0.01	6.74E-06	Physical_Access_to_the_MDM1
0.000674	0.01	6.74E-06	Remote_Access_to_the_MDM54
0.000674	0.01	6.74E-06	Physical_Access_to_the_MDM54
6.70E-05	0.1	6.70E-06	Access_to_Health_IT_OpenEMR339
6.70E-05	0.1	6.70E-06	Access_to_Health_IT_OpenEMR38
6.70E-05	0.1	6.70E-06	Access_to_Health_IT_OpenEMR53
6.70E-05	0.1	6.70E-06	Access_to_Health_IT_OpenEMR52
6.70E-05	0.1	6.70E-06	Access_to_Health_IT_OpenEMR5
6.70E-05	0.1	6.70E-06	Access_to_Health_IT_OpenEMR9
7.16E-06	0.9	6.44E-06	WiFi_Data_Capture2
6.44E-05	0.1	6.44E-06	Decrypt_WiFi_Data_Transfer3
0.000644	0.01	6.44E-06	Decrypt_Critical_Data14
0.000644	0.01	6.44E-06	Decrypt_Critical_Data544
6.44E-05	0.1	6.44E-06	Decrypt_WiFi_Data_Transfer54
7.16E-06	0.9	6.44E-06	WiFi_Data_Capture54
7.13E-06	0.9	6.42E-06	Image_Disk_with_Forensic_Tool1
7.13E-06	0.9	6.42E-06	Image_Disk_with_Forensic_Tool54
0.000625	0.01	6.25E-06	Decrypt_Critical_Data31
0.000625	0.01	6.25E-06	Decrypt_Critical_Data51

0.000625	0.01	6.25E-06	Decrypt_Critical_Data37
5.19E-05	0.1	5.19E-06	Access_to_Health_IT_OpenEMR40
5.19E-05	0.1	5.19E-06	Access_to_Health_IT_OpenEMR45
5.19E-05	0.1	5.19E-06	Access_to_Health_IT_OpenEMR54
1.02E-05	0.5	5.11E-06	Buying_Malware
1.02E-05	0.5	5.11E-06	Buying_Malware37
1.02E-05	0.5	5.11E-06	Buying_Malware51
4.20E-05	0.1	4.20E-06	Access_to_Health_IT_OpenEMR7
4.20E-05	0.1	4.20E-06	Access_to_Health_IT_OpenEMR11
4.20E-05	0.1	4.20E-06	Access_to_Health_IT_OpenEMR39
4.20E-05	0.1	4.20E-06	Access_to_Health_IT_OpenEMR338
4.20E-05	0.1	4.20E-06	Access_to_Health_IT_OpenEMR552
4.20E-05	0.1	4.20E-06	Access_to_Health_IT_OpenEMR553
3.68E-05	0.1	3.68E-06	Access_to_Health_IT_OpenEMR2
3.68E-05	0.1	3.68E-06	Access_to_Health_IT_OpenEMR337
3.68E-05	0.1	3.68E-06	Access_to_Health_IT_OpenEMR51
3.60E-05	0.1	3.60E-06	Access_the_Backup_system_on_site1
3.60E-05	0.1	3.60E-06	Access_the_Backup_system_on_site54
3.25E-05	0.1	3.25E-06	Access_to_Health_IT_OpenEMR35
3.25E-05	0.1	3.25E-06	Access_to_Health_IT_OpenEMR440
3.25E-05	0.1	3.25E-06	Access_to_Health_IT_OpenEMR554
5.80E-06	0.5	2.90E-06	Mobile_Device_User_Does_Not_Notice38
0.00029	0.01	2.90E-06	Decrypt_Critical_Data52
0.00029	0.01	2.90E-06	Decrypt_Critical_Data38
2.90E-05	0.1	2.90E-06	Connect_as_OpenEMR38
5.80E-06	0.5	2.90E-06	Mobile_Device_User_Does_Not_Notice52
3.22E-06	0.9	2.90E-06	Ask_Receives_Critical_Data_from_the_User38
3.22E-06	0.9	2.90E-06	Disconnect_OpenEMR38
3.22E-06	0.9	2.90E-06	Disconnect_OpenEMR52
2.90E-05	0.1	2.90E-06	Connect_as_OpenEMR52
3.22E-06	0.9	2.90E-06	Ask_Receives_Critical_Data_from_the_User52
3.58E-06	0.75	2.68E-06	Malicious_Access_Point1

2.68E-05	0.1	2.68E-06	Critical_data_is_resident_on_Mobile_device1
0.000268	0.01	2.68E-06	Access_from_AP_to_Mobile_Device1
5.37E-06	0.5	2.68E-06	Mobile_Device_Attaches_to_Malicious_Access_Point1
0.000268	0.01	2.68E-06	Access_from_AP_to_Mobile_Device54
3.58E-06	0.75	2.68E-06	Malicious_Access_Point54
2.68E-05	0.1	2.68E-06	Critical_data_is_resident_on_Mobile_device54
5.37E-06	0.5	2.68E-06	Mobile_Device_Attaches_to_Malicious_Access_Point54
2.31E-05	0.1	2.31E-06	Access_to_Health_IT_OpenEMR4
2.31E-05	0.1	2.31E-06	Access_to_Health_IT_OpenEMR37
2.31E-05	0.1	2.31E-06	Access_to_Health_IT_OpenEMR551
1.87E-05	0.1	1.87E-06	Blue_Tooth_Egress442
1.87E-05	0.1	1.87E-06	Blue_Tooth_Egress54
0.000148	0.01	1.48E-06	Access_from_AP_to_Mobile_Device443
1.97E-06	0.75	1.48E-06	Malicious_Access_Point443
2.95E-06	0.5	1.48E-06	Mobile_Device_Attaches_to_Malicious_Access_Point443
1.48E-05	0.1	1.48E-06	Install_File_Copying_Malware443
2.41E-06	0.5	1.21E-06	WiFi_Egress443
1.13E-05	0.1	1.13E-06	Access_thru_HIT_Server_Room_Firewall
0.000113	0.01	1.13E-06	Decrypt_Critical_Data
1.13E-05	0.1	1.13E-06	Access_thru_HIT_Server_Room_Firewall50
0.000113	0.01	1.13E-06	Decrypt_Critical_Data36
1.13E-05	0.1	1.13E-06	Access_thru_HIT_Server_Room_Firewall36
0.000113	0.01	1.13E-06	Decrypt_Critical_Data50
1.43E-06	0.5	7.13E-07	Obtain_OS_Authentication1
1.43E-06	0.5	7.13E-07	Obtain_OS_Authentication54
6.69E-06	0.1	6.69E-07	Access_to_Health_IT_OpenEMR
6.69E-06	0.1	6.69E-07	Access_to_Health_IT_OpenEMR36
6.69E-06	0.1	6.69E-07	Access_to_Health_IT_OpenEMR50
7.15E-07	0.9	6.44E-07	Capture_Critical_Data54
6.44E-05	0.01	6.44E-07	Breach_Firewall54
6.44E-05	0.01	6.44E-07	Decrypt_Critical_Data154

5.68E-06	0.1	5.68E-07	Coding_Malware
5.68E-06	0.1	5.68E-07	Coding_Malware37
5.68E-06	0.1	5.68E-07	Coding_Malware51
4.19E-06	0.1	4.19E-07	Access_to_Health_IT_OpenEMR30
4.19E-06	0.1	4.19E-07	Access_to_Health_IT_OpenEMR366
4.19E-06	0.1	4.19E-07	Access_to_Health_IT_OpenEMR550
7.15E-07	0.5	3.58E-07	Capture_Critical_Data3
3.58E-05	0.01	3.58E-07	Breach_Firewall
3.58E-05	0.01	3.58E-07	Decrypt_Critical_Data15
2.84E-06	0.1	2.84E-07	Egress_Data_Thru_Firewall40
2.84E-06	0.1	2.84E-07	Egress_Data_Thru_Firewall2
2.84E-06	0.1	2.84E-07	Egress_Data_Thru_Firewall54
2.50E-06	0.1	2.50E-07	Health_IT_Configuration_Management34
2.50E-06	0.1	2.50E-07	VPN_Server32
2.50E-06	0.1	2.50E-07	Risk_Manager32
2.50E-06	0.1	2.50E-07	Vulnerability_Scanners32
2.50E-06	0.1	2.50E-07	Health_IT_CA_Root2
2.50E-06	0.1	2.50E-07	DNS_Server_Ext34
2.50E-06	0.1	2.50E-07	Health_IT_DNS34
2.50E-06	0.1	2.50E-07	Intrusion_Detection_System_IDS_34
2.50E-06	0.1	2.50E-07	Health_IT_DNS32
2.50E-06	0.1	2.50E-07	DNS_Server_Ext32
2.50E-06	0.1	2.50E-07	Health_IT_CA_Root32
2.50E-06	0.1	2.50E-07	Intrusion_Detection_System_IDS_32
2.50E-06	0.1	2.50E-07	Health_IT_Configuration_Management32
2.50E-06	0.1	2.50E-07	Virus_Malware32
2.50E-06	0.1	2.50E-07	Mobile_Network_Access_Control_NAC_32
2.50E-06	0.1	2.50E-07	Risk_Manager34
2.50E-06	0.1	2.50E-07	Vulnerability_Scanners34
2.50E-06	0.1	2.50E-07	Virus_Malware34
2.50E-06	0.1	2.50E-07	Mobile_Network_Access_Control_NAC_34
2.50E-06	0.1	2.50E-07	VPN_Server34

2.50E-06	0.1	2.50E-07	Mobile_Network_Access_Control__NAC_38
2.50E-06	0.1	2.50E-07	Intrusion_Detection_System__IDS_38
2.50E-06	0.1	2.50E-07	Virus_Malware38
2.50E-06	0.1	2.50E-07	Health_IT_Configuration_Management38
2.50E-06	0.1	2.50E-07	Vulnerability_Scanners38
2.50E-06	0.1	2.50E-07	Health_IT_CA_Root38
2.50E-06	0.1	2.50E-07	DNS_Server_Ext38
2.50E-06	0.1	2.50E-07	Health_IT_DNS38
2.50E-06	0.1	2.50E-07	Intrusion_Detection_System__IDS_39
2.50E-06	0.1	2.50E-07	VPN_Server38
2.50E-06	0.1	2.50E-07	VPN_Server39
2.50E-06	0.1	2.50E-07	Risk_Manager39
2.50E-06	0.1	2.50E-07	Vulnerability_Scanners39
2.50E-06	0.1	2.50E-07	Virus_Malware39
2.50E-06	0.1	2.50E-07	Mobile_Network_Access_Control__NAC_39
2.50E-06	0.1	2.50E-07	Risk_Manager38
2.50E-06	0.1	2.50E-07	Health_IT_Configuration_Management39
2.50E-06	0.1	2.50E-07	Health_IT_CA_Root39
2.50E-06	0.1	2.50E-07	Health_IT_DNS39
2.50E-06	0.1	2.50E-07	DNS_Server_Ext39
2.50E-06	0.1	2.50E-07	VPN_Server53
2.50E-06	0.1	2.50E-07	Risk_Manager53
2.50E-06	0.1	2.50E-07	Vulnerability_Scanners53
2.50E-06	0.1	2.50E-07	Virus_Malware53
2.50E-06	0.1	2.50E-07	Health_IT_DNS53
2.50E-06	0.1	2.50E-07	Intrusion_Detection_System__IDS_53
2.50E-06	0.1	2.50E-07	VPN_Server52
2.50E-06	0.1	2.50E-07	DNS_Server_Ext53
2.50E-06	0.1	2.50E-07	Vulnerability_Scanners52
2.50E-06	0.1	2.50E-07	Health_IT_Configuration_Management53
2.50E-06	0.1	2.50E-07	Health_IT_CA_Root53
2.50E-06	0.1	2.50E-07	Mobile_Network_Access_Control__NAC_53

2.50E-06	0.1	2.50E-07	Risk_Manager52
2.50E-06	0.1	2.50E-07	Health_IT_CA_Root52
2.50E-06	0.1	2.50E-07	Mobile_Network_Access_Control__NAC_52
2.50E-06	0.1	2.50E-07	DNS_Server_Ext52
2.50E-06	0.1	2.50E-07	Health_IT_Configuration_Management52
2.50E-06	0.1	2.50E-07	Virus_Malware52
2.50E-06	0.1	2.50E-07	Health_IT_DNS52
2.50E-06	0.1	2.50E-07	Intrusion_Detection_System__IDS_52
1.94E-06	0.1	1.94E-07	Health_IT_CA_Root40
1.94E-06	0.1	1.94E-07	Intrusion_Detection_System__IDS_40
1.94E-06	0.1	1.94E-07	DNS_Server_Ext40
1.94E-06	0.1	1.94E-07	Mobile_Network_Access_Control__NAC_40
1.94E-06	0.1	1.94E-07	Vulnerability_Scanners40
1.94E-06	0.1	1.94E-07	Health_IT_Configuration_Management40
1.94E-06	0.1	1.94E-07	Health_IT_DNS40
1.94E-06	0.1	1.94E-07	VPN_Server40
1.94E-06	0.1	1.94E-07	Virus_Malware40
1.94E-06	0.1	1.94E-07	Risk_Manager40
1.94E-06	0.1	1.94E-07	Health_IT_Configuration_Management54
1.94E-06	0.1	1.94E-07	Health_IT_CA_Root54
1.94E-06	0.1	1.94E-07	Vulnerability_Scanners54
1.94E-06	0.1	1.94E-07	Intrusion_Detection_System__IDS_54
1.94E-06	0.1	1.94E-07	Health_IT_DNS54
1.94E-06	0.1	1.94E-07	DNS_Server_Ext54
1.94E-06	0.1	1.94E-07	Health_IT_CA_Root35
1.94E-06	0.1	1.94E-07	Mobile_Network_Access_Control__NAC_54
1.94E-06	0.1	1.94E-07	DNS_Server_Ext35
1.94E-06	0.1	1.94E-07	Health_IT_Configuration_Management35
1.94E-06	0.1	1.94E-07	Health_IT_DNS35
1.94E-06	0.1	1.94E-07	Intrusion_Detection_System__IDS_35
1.94E-06	0.1	1.94E-07	Risk_Manager54
1.94E-06	0.1	1.94E-07	Virus_Malware54

1.94E-06	0.1	1.94E-07	Vulnerability_Scanners35
1.94E-06	0.1	1.94E-07	Risk_Manager35
1.94E-06	0.1	1.94E-07	VPN_Server35
1.94E-06	0.1	1.94E-07	VPN_Server54
1.94E-06	0.1	1.94E-07	Mobile_Network_Access_Control__NAC_35
1.94E-06	0.1	1.94E-07	Virus_Malware35
3.25E-07	0.5	1.62E-07	Mobile_Device_User_Does_Not_Notice443
3.25E-07	0.5	1.62E-07	Ask_Receives_Critical_Data_from_the_User443
1.62E-06	0.1	1.62E-07	Connect_as_OpenEMR443
1.62E-06	0.1	1.62E-07	Connect_as_OpenEMR54
3.25E-07	0.5	1.62E-07	Ask_Receives_Critical_Data_from_the_User54
3.25E-07	0.5	1.62E-07	Mobile_Device_User_Does_Not_Notice54
1.37E-06	0.1	1.37E-07	Virus_Malware37
1.37E-06	0.1	1.37E-07	Health_IT_CA_Root37
1.37E-06	0.1	1.37E-07	Mobile_Network_Access_Control__NAC_37
1.37E-06	0.1	1.37E-07	Health_IT_Configuration_Management37
1.37E-06	0.1	1.37E-07	Vulnerability_Scanners37
1.37E-06	0.1	1.37E-07	Risk_Manager37
1.37E-06	0.1	1.37E-07	VPN_Server37
1.37E-06	0.1	1.37E-07	Health_IT_DNS37
1.37E-06	0.1	1.37E-07	Intrusion_Detection_System__IDS_37
1.37E-06	0.1	1.37E-07	Risk_Manager12
1.37E-06	0.1	1.37E-07	Health_IT_CA_Root3
1.37E-06	0.1	1.37E-07	DNS_Server_Ext11
1.37E-06	0.1	1.37E-07	DNS_Server_Ext37
1.37E-06	0.1	1.37E-07	Health_IT_DNS5
1.37E-06	0.1	1.37E-07	Intrusion_Detection_System__IDS_6
1.37E-06	0.1	1.37E-07	VPN_Server13
1.37E-06	0.1	1.37E-07	Virus_Malware9
1.37E-06	0.1	1.37E-07	Vulnerability_Scanners8
1.37E-06	0.1	1.37E-07	Health_IT_Configuration_Management4
1.37E-06	0.1	1.37E-07	Mobile_Network_Access_Control__NAC_7

1.37E-06	0.1	1.37E-07	Health_IT_Configuration_Management51
1.37E-06	0.1	1.37E-07	Health_IT_DNS51
1.37E-06	0.1	1.37E-07	Intrusion_Detection_System__IDS_51
1.37E-06	0.1	1.37E-07	DNS_Server_Ext51
1.37E-06	0.1	1.37E-07	Vulnerability_Scanners51
1.37E-06	0.1	1.37E-07	Risk_Manager51
1.37E-06	0.1	1.37E-07	VPN_Server51
1.37E-06	0.1	1.37E-07	Health_IT_CA_Root51
1.37E-06	0.1	1.37E-07	Mobile_Network_Access_Control__NAC_51
1.37E-06	0.1	1.37E-07	Virus_Malware51
1.34E-06	0.1	1.34E-07	Blue_Tooth_Egress443
2.49E-07	0.1	2.49E-08	Health_IT_Configuration_Management
2.49E-07	0.1	2.49E-08	Health_IT_CA_Root
2.49E-07	0.1	2.49E-08	VPN_Server
2.49E-07	0.1	2.49E-08	Vulnerability_Scanners
2.49E-07	0.1	2.49E-08	Virus_Malware
2.49E-07	0.1	2.49E-08	Risk_Manager
2.49E-07	0.1	2.49E-08	DNS_Server_Ext
2.49E-07	0.1	2.49E-08	Health_IT_DNS
2.49E-07	0.1	2.49E-08	Intrusion_Detection_System__IDS__
2.49E-07	0.1	2.49E-08	Mobile_Network_Access_Control__NAC__
2.49E-07	0.1	2.49E-08	Health_IT_DNS36
2.49E-07	0.1	2.49E-08	DNS_Server_Ext36
2.49E-07	0.1	2.49E-08	Health_IT_CA_Root36
2.49E-07	0.1	2.49E-08	Health_IT_Configuration_Management36
2.49E-07	0.1	2.49E-08	Intrusion_Detection_System__IDS_36
2.49E-07	0.1	2.49E-08	Vulnerability_Scanners36
2.49E-07	0.1	2.49E-08	Virus_Malware36
2.49E-07	0.1	2.49E-08	Risk_Manager36
2.49E-07	0.1	2.49E-08	VPN_Server36
2.49E-07	0.1	2.49E-08	Mobile_Network_Access_Control__NAC_36
2.49E-07	0.1	2.49E-08	Vulnerability_Scanners50

2.49E-07	0.1	2.49E-08	Virus_Malware50
2.49E-07	0.1	2.49E-08	DNS_Server_Ext50
2.49E-07	0.1	2.49E-08	Risk_Manager50
2.49E-07	0.1	2.49E-08	Health_IT_Configuration_Management50
2.49E-07	0.1	2.49E-08	Health_IT_DNS50
2.49E-07	0.1	2.49E-08	Intrusion_Detection_System_IDS_50
2.49E-07	0.1	2.49E-08	VPN_Server50
2.49E-07	0.1	2.49E-08	Mobile_Network_Access_Control_NAC_50
2.49E-07	0.1	2.49E-08	Health_IT_CA_Root50
1.97E-08	0.75	1.48E-08	Malicious_Access_Point554
2.95E-08	0.5	1.48E-08	Mobile_Device_Attaches_to_Malicious_Access_Point554
1.48E-06	0.01	1.48E-08	Access_from_AP_to_Mobile_Device554
1.48E-06	0.01	1.48E-08	Blue_Tooth_Access554
1.48E-07	0.1	1.48E-08	Install_File_Copying_Malware554
2.41E-08	0.5	1.21E-08	WiFi_Egress554
1.34E-08	0.1	1.34E-09	Blue_Tooth_Egress554

427

428 *Table 14: Fault-Tree Results Based on Integrity*

Partial Derivative	Probability	Maximum Impact	Event
0.815	0.9	0.733	Physical_Access__User_walks_away_from_logged_on_Mobile_Device1
0.0855	0.1	0.00855	Install_File_Modifying_Malware
0.0855	0.1	0.00855	Install_File_Modifying_Malware123
0.0045	0.9	0.00405	User_walks_away_from_logged_on_Mobile_Device4433
0.0045	0.9	0.00405	User_walks_away_from_logged_on_Mobile_Device443
0.0009	0.5	0.00045	Obtain_OS_Athenication4433
0.0009	0.5	0.00045	Obtain_OS_Athenication443
0.0307	0.01	0.000307	Access_from_AP_to_Mobile_Device1
0.000613	0.5	0.000307	Mobile_Device_Attaches_to_Malicious_Access_Point1

0.000409	0.75	0.000307	Malicious_Access_Point1
0.0033	0.01	3.30E-05	Changing_Crtical_Data4122
0.0033	0.01	3.30E-05	Changing_Crtical_Data4
6.60E-05	0.5	3.30E-05	Mobile_Device_User_Does_Not_Notice
3.67E-05	0.9	3.30E-05	Ask_Receive Critical_Data_from_the_User1
0.00033	0.1	3.30E-05	Connect_as_OpenEMR2
6.60E-05	0.5	3.30E-05	Mobile_Device_User_Does_Not_Notice1221
3.67E-05	0.9	3.30E-05	Ask_Receive Critical_Data_from_the_User1211
3.67E-05	0.9	3.30E-05	Disconnect_OpenEMR1222
3.67E-05	0.9	3.30E-05	Disconnect_OpenEMR
0.00033	0.1	3.30E-05	Connect_as_OpenEMR2122
0.00306	0.01	3.06E-05	Access_from_AP_to_Mobile_Device554
0.00306	0.01	3.06E-05	Access_from_AP_to_Mobile_Device443
4.07E-05	0.75	3.06E-05	Malicious_Access_Point554
4.07E-05	0.75	3.06E-05	Malicious_Access_Point443
0.000306	0.1	3.06E-05	Install_File_Modifying_Malware554
6.11E-05	0.5	3.06E-05	Mobile_Device_Attaches_to_Malicious_Access_Point554
6.11E-05	0.5	3.06E-05	Mobile_Device_Attaches_to_Malicious_Access_Point443
0.000306	0.1	3.06E-05	Install_File_Modifying_Malware443
0.000204	0.01	2.04E-06	Force_Backup_Online__Critical_System_Failure274
0.000204	0.01	2.04E-06	Decrypt_the_Back_up54
0.000204	0.01	2.04E-06	Force_Backup_Online__Critical_System_Failure27
4.07E-06	0.5	2.04E-06	Replace_with_Modified_Backup1
0.000204	0.01	2.04E-06	Decrypt_the_Back_up4
4.07E-06	0.5	2.04E-06	During_Physical_Transfer_Obtain_Copy1
4.07E-06	0.5	2.04E-06	During_Physical_Transfer_Obtain_Copy54
4.07E-06	0.5	2.04E-06	Replace_with_Modified_Backup14
6.60E-07	0.5	3.30E-07	Mobile_Device_User_Does_Not_Notice32
3.30E-05	0.01	3.30E-07	Changing_Crtical_Data3212
3.30E-05	0.01	3.30E-07	Decrypt_Critical_Data52

3.30E-06	0.1	3.30E-07	Connect_as_OpenEMR52
3.67E-07	0.9	3.30E-07	Disconnect_OpenEMR52
3.67E-07	0.9	3.30E-07	Ask_Receive_Critical_Data_from_the_User52
6.62E-06	0.01	6.62E-08	Re_Encrypt_Modified_Critical_Data2644
6.62E-06	0.01	6.62E-08	Decrypt_Critical_Data534
6.62E-06	0.01	6.62E-08	Changing_Critical_Data2644
7.35E-08	0.9	6.62E-08	PluginHub
7.35E-08	0.9	6.62E-08	PluginHub54
6.62E-06	0.01	6.62E-08	Decrypt_Critical_Data443
6.62E-06	0.01	6.62E-08	Changing_Critical_Data264
6.62E-06	0.01	6.62E-08	Re_Encrypt_Modified_Critical_Data264
7.15E-08	0.9	6.43E-08	Laptop_Wireshark54
7.15E-08	0.9	6.43E-08	Laptop_Wireshark2
2.04E-08	0.9	1.83E-08	Capture_Critical_Data554
3.67E-08	0.5	1.83E-08	Acquire_Password54
3.67E-08	0.5	1.83E-08	Send_Data_to_New_GW54
1.83E-06	0.01	1.83E-08	Re_Encrypt_Modified_Critical_Data2654
2.04E-08	0.9	1.83E-08	Capture_Critical_Data2
1.83E-06	0.01	1.83E-08	Changing_Critical_Data2654
1.83E-06	0.01	1.83E-08	Decrypt_Critical_Data1554
3.67E-08	0.5	1.83E-08	Acquire_Password2
3.67E-08	0.5	1.83E-08	Send_Data_to_New_GW
1.83E-06	0.01	1.83E-08	Changing_Critical_Data265
1.83E-06	0.01	1.83E-08	Decrypt_Critical_Data16
1.83E-06	0.01	1.83E-08	Re_Encrypt_Modified_Critical_Data265
1.29E-06	0.01	1.29E-08	Changing_Critical_Data6
1.29E-06	0.01	1.29E-08	Decrypt_Critical_Data35
1.29E-06	0.01	1.29E-08	Re_Encrypt_Modified_Critical_Data6
1.29E-06	0.01	1.29E-08	Decrypt_Critical_Data53
1.29E-06	0.01	1.29E-08	Decrypt_Critical_Data552
1.29E-06	0.01	1.29E-08	Re_Encrypt_Modified_Critical_Data233
1.29E-06	0.01	1.29E-08	Re_Encrypt_Modified_Critical_Data323

1.29E-06	0.01	1.29E-08	Changing_Crtical_Data323
1.29E-06	0.01	1.29E-08	Changing_Crtical_Data233
1.29E-06	0.01	1.29E-08	Changing_Crtical_Data333
1.29E-06	0.01	1.29E-08	Decrypt_Critical_Data7
1.29E-06	0.01	1.29E-08	Changing_Crtical_Data3
1.29E-06	0.01	1.29E-08	Re_Encrypt_Modified_Critical_Data31
1.29E-06	0.01	1.29E-08	Re_Encrypt_Modified_Critical_Data333
1.29E-06	0.01	1.29E-08	Decrypt_Critical_Data5
1.29E-06	0.01	1.29E-08	Decrypt_Critical_Data338
1.29E-06	0.01	1.29E-08	Re_Encrypt_Modified_Critical_Data23
1.29E-06	0.01	1.29E-08	Decrypt_Critical_Data339
1.29E-06	0.01	1.29E-08	Changing_Crtical_Data32
1.29E-06	0.01	1.29E-08	Changing_Crtical_Data23
1.29E-06	0.01	1.29E-08	Re_Encrypt_Modified_Critical_Data32
1.00E-06	0.01	1.00E-08	Re_Encrypt_Modified_Critical_Data2633
1.00E-06	0.01	1.00E-08	Changing_Crtical_Data26
1.00E-06	0.01	1.00E-08	Re_Encrypt_Modified_Critical_Data26
1.00E-06	0.01	1.00E-08	Decrypt_Critical_Data54
1.00E-06	0.01	1.00E-08	Changing_Crtical_Data2633
1.00E-06	0.01	1.00E-08	Decrypt_Critical_Data40
1.16E-08	0.75	8.72E-09	Thumb_Drive40
1.16E-08	0.75	8.72E-09	Thumb_Drive54
7.62E-08	0.1	7.62E-09	Access_to_Health_IT_OpenEMR339
7.62E-08	0.1	7.62E-09	Access_to_Health_IT_OpenEMR53
7.62E-08	0.1	7.62E-09	Access_to_Health_IT_OpenEMR52
7.62E-08	0.1	7.62E-09	Access_to_Health_IT_OpenEMR45
7.62E-08	0.1	7.62E-09	Access_to_Health_IT_OpenEMR38
7.62E-08	0.1	7.62E-09	Access_to_Health_IT_OpenEMR9
7.62E-08	0.1	7.62E-09	Access_to_Health_IT_OpenEMR5
7.33E-07	0.01	7.33E-09	Re_Encrypt_Modified_Critical_Data2623
7.33E-07	0.01	7.33E-09	Changing_Crtical_Data2623
7.33E-07	0.01	7.33E-09	Decrypt_Critical_Data544

7.33E-08	0.1	7.33E-09	Decrypt_WiFi_Data_Transfer3
8.15E-09	0.9	7.33E-09	WiFi_Data_Capture54
7.33E-08	0.1	7.33E-09	Decrypt_WiFi_Data_Transfer54
8.15E-09	0.9	7.33E-09	WiFi_Data_Capture2
7.33E-07	0.01	7.33E-09	Decrypt_Critical_Data14
7.33E-07	0.01	7.33E-09	Re_Encrypt_Modified_Critical_Data262
7.33E-07	0.01	7.33E-09	Changing_Critical_Data262
7.11E-07	0.01	7.11E-09	Decrypt_Critical_Data31
7.11E-07	0.01	7.11E-09	Decrypt_Critical_Data51
7.11E-07	0.01	7.11E-09	Re_Encrypt_Modified_Critical_Data223
7.11E-07	0.01	7.11E-09	Re_Encrypt_Modified_Critical_Data2
7.11E-07	0.01	7.11E-09	Changing_Critical_Data223
7.11E-07	0.01	7.11E-09	Changing_Critical_Data2
7.11E-07	0.01	7.11E-09	Decrypt_Critical_Data37
7.11E-07	0.01	7.11E-09	Re_Encrypt_Modified_Critical_Data22
7.11E-07	0.01	7.11E-09	Changing_Critical_Data22
5.90E-08	0.1	5.90E-09	Access_to_Health_IT_OpenEMR40
5.90E-08	0.1	5.90E-09	Access_to_Health_IT_OpenEMR54
1.16E-08	0.5	5.81E-09	Buying_Malware
1.16E-08	0.5	5.81E-09	Buying_Malware51
1.16E-08	0.5	5.81E-09	Buying_Malware37
4.78E-08	0.1	4.78E-09	Access_to_Health_IT_OpenEMR35
4.78E-08	0.1	4.78E-09	Access_to_Health_IT_OpenEMR7
4.78E-08	0.1	4.78E-09	Access_to_Health_IT_OpenEMR11
4.78E-08	0.1	4.78E-09	Access_to_Health_IT_OpenEMR338
4.78E-08	0.1	4.78E-09	Access_to_Health_IT_OpenEMR39
4.78E-08	0.1	4.78E-09	Access_to_Health_IT_OpenEMR552
4.78E-08	0.1	4.78E-09	Access_to_Health_IT_OpenEMR553
4.19E-08	0.1	4.19E-09	Access_to_Health_IT_OpenEMR337
4.19E-08	0.1	4.19E-09	Access_to_Health_IT_OpenEMR2
4.19E-08	0.1	4.19E-09	Access_to_Health_IT_OpenEMR51
3.70E-08	0.1	3.70E-09	Access_to_Health_IT_OpenEMR554

3.70E-08	0.1	3.70E-09	Access_to_Health_IT_OpenEMR440
2.63E-08	0.1	2.63E-09	Access_to_Health_IT_OpenEMR37
2.63E-08	0.1	2.63E-09	Access_to_Health_IT_OpenEMR551
2.63E-08	0.1	2.63E-09	Access_to_Health_IT_OpenEMR4
1.29E-08	0.1	1.29E-09	Access_thru_HIT_Server_Room_Firewall
1.29E-08	0.1	1.29E-09	Access_thru_HIT_Server_Room_Firewall36
1.29E-08	0.1	1.29E-09	Access_thru_HIT_Server_Room_Firewall50
1.29E-07	0.01	1.29E-09	Decrypt_Critical_Data50
1.29E-07	0.01	1.29E-09	Re_Encrypt_Modified_Critical_Data3
1.29E-07	0.01	1.29E-09	Changing_Critical_Data1
1.29E-07	0.01	1.29E-09	Changing_Critical_Data2211
1.29E-07	0.01	1.29E-09	Re_Encrypt_Modified_Critical_Data2211
1.29E-07	0.01	1.29E-09	Decrypt_Critical_Data36
1.29E-07	0.01	1.29E-09	Changing_Critical_Data221
1.29E-07	0.01	1.29E-09	Re_Encrypt_Modified_Critical_Data221
1.29E-07	0.01	1.29E-09	Decrypt_Critical_Data
7.62E-09	0.1	7.62E-10	Access_to_Health_IT_OpenEMR
7.62E-09	0.1	7.62E-10	Access_to_Health_IT_OpenEMR50
7.62E-09	0.1	7.62E-10	Access_to_Health_IT_OpenEMR36
8.15E-10	0.9	7.33E-10	Capture_Critical_Data54
7.33E-08	0.01	7.33E-10	Changing_Critical_Data2634
7.33E-08	0.01	7.33E-10	Re_Encrypt_Modified_Critical_Data2634
7.33E-08	0.01	7.33E-10	Breach_Firewall54
7.33E-08	0.01	7.33E-10	Decrypt_Critical_Data154
6.46E-09	0.1	6.46E-10	Coding_Malware
6.46E-09	0.1	6.46E-10	Coding_Malware51
6.46E-09	0.1	6.46E-10	Coding_Malware37
4.78E-09	0.1	4.78E-10	Access_to_Health_IT_OpenEMR30
4.78E-09	0.1	4.78E-10	Access_to_Health_IT_OpenEMR550
4.78E-09	0.1	4.78E-10	Access_to_Health_IT_OpenEMR366
4.07E-08	0.01	4.07E-10	Changing_Critical_Data263
4.07E-08	0.01	4.07E-10	Re_Encrypt_Modified_Critical_Data263

4.07E-08	0.01	4.07E-10	Breach_Firewall
4.07E-08	0.01	4.07E-10	Decrypt_Critical_Data15
8.15E-10	0.5	4.07E-10	Capture_Critical_Data3
3.23E-09	0.1	3.23E-10	Egress_Data_Thru_Firewall54
3.23E-09	0.1	3.23E-10	Egress_Data_Thru_Firewall40
2.84E-09	0.1	2.84E-10	Health_IT_Configuration_Management35
2.84E-09	0.1	2.84E-10	DNS_Server_Ext35
2.84E-09	0.1	2.84E-10	Intrusion_Detection_System_IDS_52
2.84E-09	0.1	2.84E-10	Health_IT_DNS52
2.84E-09	0.1	2.84E-10	Health_IT_CA_Root38
2.84E-09	0.1	2.84E-10	Health_IT_Configuration_Management53
2.84E-09	0.1	2.84E-10	Mobile_Network_Access_Control_NAC_52
2.84E-09	0.1	2.84E-10	VPN_Server34
2.84E-09	0.1	2.84E-10	Vulnerability_Scanners52
2.84E-09	0.1	2.84E-10	DNS_Server_Ext53
2.84E-09	0.1	2.84E-10	Risk_Manager52
2.84E-09	0.1	2.84E-10	Health_IT_CA_Root35
2.84E-09	0.1	2.84E-10	Health_IT_CA_Root53
2.84E-09	0.1	2.84E-10	Mobile_Network_Access_Control_NAC_32
2.84E-09	0.1	2.84E-10	Health_IT_Configuration_Management52
2.84E-09	0.1	2.84E-10	VPN_Server52
2.84E-09	0.1	2.84E-10	Virus_Malware52
2.84E-09	0.1	2.84E-10	Health_IT_DNS53
2.84E-09	0.1	2.84E-10	Health_IT_Configuration_Management38
2.84E-09	0.1	2.84E-10	Intrusion_Detection_System_IDS_35
2.84E-09	0.1	2.84E-10	Health_IT_CA_Root32
2.84E-09	0.1	2.84E-10	Vulnerability_Scanners53
2.84E-09	0.1	2.84E-10	Health_IT_Configuration_Management32
2.84E-09	0.1	2.84E-10	Intrusion_Detection_System_IDS_32
2.84E-09	0.1	2.84E-10	Risk_Manager53
2.84E-09	0.1	2.84E-10	DNS_Server_Ext32
2.84E-09	0.1	2.84E-10	Health_IT_DNS32

2.84E-09	0.1	2.84E-10	Mobile_Network_Access_Control__NAC_53
2.84E-09	0.1	2.84E-10	Health_IT_DNS35
2.84E-09	0.1	2.84E-10	DNS_Server_Ext38
2.84E-09	0.1	2.84E-10	Mobile_Network_Access_Control__NAC_35
2.84E-09	0.1	2.84E-10	Virus_Malware53
2.84E-09	0.1	2.84E-10	Vulnerability_Scanners35
2.84E-09	0.1	2.84E-10	Intrusion_Detection_System__IDS_53
2.84E-09	0.1	2.84E-10	VPN_Server35
2.84E-09	0.1	2.84E-10	Virus_Malware35
2.84E-09	0.1	2.84E-10	Risk_Manager35
2.84E-09	0.1	2.84E-10	Vulnerability_Scanners38
2.84E-09	0.1	2.84E-10	Intrusion_Detection_System__IDS_38
2.84E-09	0.1	2.84E-10	VPN_Server39
2.84E-09	0.1	2.84E-10	Mobile_Network_Access_Control__NAC_34
2.84E-09	0.1	2.84E-10	Vulnerability_Scanners39
2.84E-09	0.1	2.84E-10	Intrusion_Detection_System__IDS_39
2.84E-09	0.1	2.84E-10	Mobile_Network_Access_Control__NAC_39
2.84E-09	0.1	2.84E-10	Risk_Manager39
2.84E-09	0.1	2.84E-10	Virus_Malware39
2.84E-09	0.1	2.84E-10	Health_IT_DNS39
2.84E-09	0.1	2.84E-10	DNS_Server_Ext34
2.84E-09	0.1	2.84E-10	Virus_Malware32
2.84E-09	0.1	2.84E-10	Intrusion_Detection_System__IDS_34
2.84E-09	0.1	2.84E-10	Risk_Manager32
2.84E-09	0.1	2.84E-10	Health_IT_DNS34
2.84E-09	0.1	2.84E-10	Health_IT_CA_Root2
2.84E-09	0.1	2.84E-10	Vulnerability_Scanners32
2.84E-09	0.1	2.84E-10	VPN_Server32
2.84E-09	0.1	2.84E-10	Health_IT_DNS38
2.84E-09	0.1	2.84E-10	Risk_Manager34
2.84E-09	0.1	2.84E-10	DNS_Server_Ext52
2.84E-09	0.1	2.84E-10	Risk_Manager38

2.84E-09	0.1	2.84E-10	Health_IT_CA_Root52
2.84E-09	0.1	2.84E-10	Health_IT_Configuration_Management34
2.84E-09	0.1	2.84E-10	Vulnerability_Scanners34
2.84E-09	0.1	2.84E-10	VPN_Server38
2.84E-09	0.1	2.84E-10	Virus_Malware34
2.84E-09	0.1	2.84E-10	DNS_Server_Ext39
2.84E-09	0.1	2.84E-10	Health_IT_Configuration_Management39
2.84E-09	0.1	2.84E-10	VPN_Server53
2.84E-09	0.1	2.84E-10	Virus_Malware38
2.84E-09	0.1	2.84E-10	Mobile_Network_Access_Control__NAC_38
2.84E-09	0.1	2.84E-10	Health_IT_CA_Root39
2.20E-09	0.1	2.20E-10	Vulnerability_Scanners54
2.20E-09	0.1	2.20E-10	DNS_Server_Ext54
2.20E-09	0.1	2.20E-10	VPN_Server54
2.20E-09	0.1	2.20E-10	Health_IT_Configuration_Management54
2.20E-09	0.1	2.20E-10	Risk_Manager54
2.20E-09	0.1	2.20E-10	Health_IT_DNS54
2.20E-09	0.1	2.20E-10	Intrusion_Detection_System__IDS_54
2.20E-09	0.1	2.20E-10	Mobile_Network_Access_Control__NAC_54
2.20E-09	0.1	2.20E-10	Virus_Malware54
2.20E-09	0.1	2.20E-10	Health_IT_CA_Root54
2.20E-09	0.1	2.20E-10	Health_IT_DNS40
2.20E-09	0.1	2.20E-10	DNS_Server_Ext40
2.20E-09	0.1	2.20E-10	Health_IT_Configuration_Management40
2.20E-09	0.1	2.20E-10	Intrusion_Detection_System__IDS_40
2.20E-09	0.1	2.20E-10	Vulnerability_Scanners40
2.20E-09	0.1	2.20E-10	Mobile_Network_Access_Control__NAC_40
2.20E-09	0.1	2.20E-10	VPN_Server40
2.20E-09	0.1	2.20E-10	Virus_Malware40
2.20E-09	0.1	2.20E-10	Risk_Manager40
2.20E-09	0.1	2.20E-10	Health_IT_CA_Root40
1.83E-09	0.1	1.83E-10	Connect_as_OpenEMR54

3.67E-10	0.5	1.83E-10	Ask_Receive Critical Data from the User54
1.83E-09	0.1	1.83E-10	Connect as OpenEMR443
3.67E-10	0.5	1.83E-10	Mobile Device User Does Not Notice54
3.67E-10	0.5	1.83E-10	Mobile Device User Does Not Notice443
3.67E-10	0.5	1.83E-10	Ask_Receive Critical Data from the User443
1.56E-09	0.1	1.56E-10	VPN_Server37
1.56E-09	0.1	1.56E-10	Risk_Manager37
1.56E-09	0.1	1.56E-10	Mobile_Network_Access_Control__NAC_37
1.56E-09	0.1	1.56E-10	Virus_Malware37
1.56E-09	0.1	1.56E-10	Intrusion_Detection_System__IDS_37
1.56E-09	0.1	1.56E-10	DNS_Server_Ext11
1.56E-09	0.1	1.56E-10	Health_IT_DNS37
1.56E-09	0.1	1.56E-10	Health_IT_DNS5
1.56E-09	0.1	1.56E-10	Health_IT_Configuration_Management4
1.56E-09	0.1	1.56E-10	Vulnerability_Scanners37
1.56E-09	0.1	1.56E-10	Intrusion_Detection_System__IDS_6
1.56E-09	0.1	1.56E-10	Health_IT_CA_Root3
1.56E-09	0.1	1.56E-10	DNS_Server_Ext37
1.56E-09	0.1	1.56E-10	VPN_Server13
1.56E-09	0.1	1.56E-10	Risk_Manager12
1.56E-09	0.1	1.56E-10	Vulnerability_Scanners8
1.56E-09	0.1	1.56E-10	Health_IT_Configuration_Management37
1.56E-09	0.1	1.56E-10	Virus_Malware9
1.56E-09	0.1	1.56E-10	Health_IT_CA_Root37
1.56E-09	0.1	1.56E-10	Mobile_Network_Access_Control__NAC_7
1.56E-09	0.1	1.56E-10	Health_IT_CA_Root51
1.56E-09	0.1	1.56E-10	DNS_Server_Ext51
1.56E-09	0.1	1.56E-10	Intrusion_Detection_System__IDS_51
1.56E-09	0.1	1.56E-10	Health_IT_DNS51
1.56E-09	0.1	1.56E-10	VPN_Server51
1.56E-09	0.1	1.56E-10	Mobile_Network_Access_Control__NAC_51
1.56E-09	0.1	1.56E-10	Virus_Malware51

1.56E-09	0.1	1.56E-10	Risk_Manager51
1.56E-09	0.1	1.56E-10	Health_IT_Configuration_Management51
1.56E-09	0.1	1.56E-10	Vulnerability_Scanners51
8.15E-09	0.01	8.15E-11	Force_Backup_Online__Critical_System_Failure264
8.15E-10	0.1	8.15E-11	Backup_data_Captured1
8.15E-09	0.01	8.15E-11	Re_Encrypt_Modified_Critical_Data284
8.15E-09	0.01	8.15E-11	Decrypt_Data54
8.15E-09	0.01	8.15E-11	Changing_Crtical_Data284
8.15E-10	0.1	8.15E-11	Backup_data_Captured54
8.15E-09	0.01	8.15E-11	Decrypt_Data20
8.15E-09	0.01	8.15E-11	Changing_Crtical_Data28
8.15E-10	0.1	8.15E-11	Gain_Access_to_the_Backup_System1
8.15E-09	0.01	8.15E-11	Re_Encrypt_Modified_Critical_Data28
8.15E-09	0.01	8.15E-11	Force_Backup_Online__Critical_System_Failure26
8.15E-10	0.1	8.15E-11	Access_the_Backup_system_on_site1
8.15E-09	0.01	8.15E-11	Force_Backup_Online__Critical_System_Failure25
8.15E-09	0.01	8.15E-11	Re_Encrypt_Modified_Critical_Data25
8.15E-09	0.01	8.15E-11	Changing_Crtical_Data25
8.15E-09	0.01	8.15E-11	Decrypt_Backup_Data_at_Rest21
8.15E-09	0.01	8.15E-11	Force_Backup_Online__Critical_System_Failure1
8.15E-09	0.01	8.15E-11	Changing_Crtical_Data8
8.15E-09	0.01	8.15E-11	Re_Encrypt_Modified_Critical_Data8
8.15E-09	0.01	8.15E-11	Decrypt_Backup_Data_at_Rest25
2.84E-10	0.1	2.84E-11	Health_IT_DNS36
2.84E-10	0.1	2.84E-11	VPN_Server
2.84E-10	0.1	2.84E-11	Risk_Manager
2.84E-10	0.1	2.84E-11	Vulnerability_Scanners
2.84E-10	0.1	2.84E-11	Virus_Malware
2.84E-10	0.1	2.84E-11	Health_IT_CA_Root36
2.84E-10	0.1	2.84E-11	DNS_Server_Ext36
2.84E-10	0.1	2.84E-11	Health_IT_DNS

2.84E-10	0.1	2.84E-11	Health_IT_Configuration_Management
2.84E-10	0.1	2.84E-11	DNS_Server_Ext
2.84E-10	0.1	2.84E-11	Health_IT_CA_Root
2.84E-10	0.1	2.84E-11	Mobile_Network_Access_Control__NAC__
2.84E-10	0.1	2.84E-11	Intrusion_Detection_System__IDS__
2.84E-10	0.1	2.84E-11	Health_IT_Configuration_Management36
2.84E-10	0.1	2.84E-11	Risk_Manager36
2.84E-10	0.1	2.84E-11	Mobile_Network_Access_Control__NAC__36
2.84E-10	0.1	2.84E-11	Virus_Malware36
2.84E-10	0.1	2.84E-11	Vulnerability_Scanners36
2.84E-10	0.1	2.84E-11	VPN_Server36
2.84E-10	0.1	2.84E-11	Intrusion_Detection_System__IDS__36
2.84E-10	0.1	2.84E-11	Health_IT_CA_Root50
2.84E-10	0.1	2.84E-11	DNS_Server_Ext50
2.84E-10	0.1	2.84E-11	Virus_Malware50
2.84E-10	0.1	2.84E-11	Vulnerability_Scanners50
2.84E-10	0.1	2.84E-11	Mobile_Network_Access_Control__NAC__50
2.84E-10	0.1	2.84E-11	Intrusion_Detection_System__IDS__50
2.84E-10	0.1	2.84E-11	Health_IT_DNS50
2.84E-10	0.1	2.84E-11	Health_IT_Configuration_Management50
2.84E-10	0.1	2.84E-11	VPN_Server50
2.84E-10	0.1	2.84E-11	Risk_Manager50

429

430 *Table 15: Fault-Tree Results Based on Availability*

Partial Derivative	Probability	Maximum Impact	Event
0.377	0.9	0.339	Degrade_the_Back_up4
0.678	0.5	0.339	During_Physical_Transfer_Obtain_Copy1
0.0455	0.9	0.041	Degrade_the_Back_Up_Media
0.0455	0.9	0.041	Degrade_Back_Up2
0.41	0.1	0.041	Gain_Access_to_the_Backup_System1
0.41	0.1	0.041	Backup_data_Accessed1

0.41	0.1	0.041	Access_the_Backup_system_on_site1
0.0455	0.9	0.041	Degrade_Back_Up
1.56E-12	0.9	1.40E-12	Unplug_Ethernet_Cables_from_Access_Points3
1.56E-12	0.9	1.40E-12	Unplug_Ethernet_Cables_from_Access_Points1
1.56E-12	0.9	1.40E-12	Traffic___High_Volumes_Sent177
1.56E-12	0.9	1.40E-12	Traffic___High_Volumes_Sent111
1.56E-12	0.9	1.40E-12	Physically_Destroy_Any_Critically_Functional_Devices3
1.56E-12	0.9	1.40E-12	Physically_Destroy_Any_Critically_Functional_Devices1
1.56E-12	0.9	1.40E-12	Traffic___High_Volumes_Sent1
1.56E-12	0.9	1.40E-12	Physically_Destroy_Any_Critically_Functional_Devices66
1.02E-12	0.9	9.17E-13	Install_Device_Degrading_Malware411
1.02E-12	0.9	9.17E-13	Install_Device_Degrading_Malware413
4.83E-13	0.9	4.34E-13	User_walks_away_from_logged_on_Mobile_Device4431
4.83E-13	0.9	4.34E-13	User_walks_away_from_logged_on_Mobile_Device4433
3.11E-13	0.5	1.56E-13	WiFi_RF_Jamming_Device_Data_Transfer1
3.11E-13	0.5	1.56E-13	WiFi_RF_Jamming_Device_Data_Transfer3
2.12E-13	0.5	1.06E-13	Acquire_Password21
1.18E-13	0.9	1.06E-13	PluginHub1
1.18E-13	0.9	1.06E-13	Send_Data_to_New_GW_or_Reconfigure1
1.18E-13	0.9	1.06E-13	PluginHub3
2.12E-13	0.5	1.06E-13	Acquire_Password23
1.18E-13	0.9	1.06E-13	Send_Data_to_New_GW_or_Reconfigure3
9.66E-14	0.5	4.83E-14	Obtain_OS_Athenication4433
9.66E-14	0.5	4.83E-14	Obtain_OS_Athenication4431
8.03E-14	0.5	4.01E-14	Buying_Malware22
8.03E-14	0.5	4.01E-14	Buying_Malware9
8.03E-14	0.5	4.01E-14	Buying_Malware
1.73E-13	0.1	1.73E-14	Access_to_HIT_Server_Room_Firewall77
1.73E-13	0.1	1.73E-14	Access_to_HIT_Server_Room_Firewall11

1.73E-13	0.1	1.73E-14	Access_to_HIT_Server_Room_Firewall
1.73E-13	0.1	1.73E-14	Login_3
1.73E-13	0.1	1.73E-14	Connect_as_New_Device0
1.73E-13	0.1	1.73E-14	Login11
1.73E-13	0.1	1.73E-14	Connect_as_New_Device3
1.73E-13	0.1	1.73E-14	Login_66
1.73E-13	0.1	1.73E-14	Connect_as_New_Device55
1.56E-13	0.1	1.56E-14	Access_thru_HIT_Server_Room_Firewall777
1.56E-13	0.1	1.56E-14	Access_thru_HIT_Server_Room_Firewall677
1.56E-13	0.1	1.56E-14	Access_thru_HIT_Server_Room_Firewall277
1.56E-13	0.1	1.56E-14	Access_thru_HIT_Server_Room_Firewall477
1.56E-13	0.1	1.56E-14	Access_thru_HIT_Server_Room_Firewall377
1.56E-13	0.1	1.56E-14	Access_thru_HIT_Server_Room_Firewall311
1.56E-13	0.1	1.56E-14	Access_thru_HIT_Server_Room_Firewall411
1.56E-13	0.1	1.56E-14	Access_thru_HIT_Server_Room_Firewall611
1.56E-13	0.1	1.56E-14	Access_thru_HIT_Server_Room_Firewall711
1.56E-13	0.1	1.56E-14	Access_thru_HIT_Server_Room_Firewall811
1.56E-13	0.1	1.56E-14	Access_thru_HIT_Server_Room_Firewall877
1.56E-13	0.1	1.56E-14	Access_thru_HIT_Server_Room_Firewall211
1.56E-13	0.1	1.56E-14	Access_thru_HIT_Server_Room_Firewall8
1.56E-13	0.1	1.56E-14	Access_thru_HIT_Server_Room_Firewall7
1.56E-13	0.1	1.56E-14	Access_thru_HIT_Server_Room_Firewall2
1.56E-13	0.1	1.56E-14	Access_thru_HIT_Server_Room_Firewall3
1.56E-13	0.1	1.56E-14	Access_thru_HIT_Server_Room_Firewall6
1.56E-13	0.1	1.56E-14	Access_thru_HIT_Server_Room_Firewall4
1.71E-14	0.9	1.54E-14	Degrade_Access_Point11
1.71E-14	0.9	1.54E-14	Degrade_Access_Point3
1.54E-13	0.1	1.54E-14	Gain_Access_to_Access_Point13
1.54E-13	0.1	1.54E-14	Gain_Access_to_Access_Point11
1.71E-14	0.9	1.54E-14	DisconnectDevice00
1.71E-14	0.9	1.54E-14	Disconnect_OpenEMR3333
1.71E-14	0.9	1.54E-14	Disconnect_OpenEMR000

1.71E-14	0.9	1.54E-14	DisconnectDevice3333
1.54E-13	0.1	1.54E-14	Connect_as_OpenEMR23333
1.54E-13	0.1	1.54E-14	Connect_as_Device00
1.54E-13	0.1	1.54E-14	Connect_as_OpenEMR2000
1.54E-13	0.1	1.54E-14	Connect_as_Device3333
1.54E-13	0.1	1.54E-14	Connect_as_OpenEMR2
1.54E-13	0.1	1.54E-14	Connect_as_Device
1.71E-14	0.9	1.54E-14	Disconnect_OpenEMR
1.71E-14	0.9	1.54E-14	DisconnectDevice
1.54E-14	0.9	1.39E-14	Traffic__High_Volumes_Sent311
1.54E-14	0.9	1.39E-14	Traffic__High_Volumes_Sent777
1.54E-14	0.9	1.39E-14	Traffic__High_Volumes_Sent877
1.54E-14	0.9	1.39E-14	Traffic__High_Volumes_Sent711
1.54E-14	0.9	1.39E-14	Traffic__High_Volumes_Sent477
1.54E-14	0.9	1.39E-14	Traffic__High_Volumes_Sent377
1.54E-14	0.9	1.39E-14	Traffic__High_Volumes_Sent677
1.54E-14	0.9	1.39E-14	Traffic__High_Volumes_Sent611
1.54E-14	0.9	1.39E-14	Traffic__High_Volumes_Sent411
1.54E-14	0.9	1.39E-14	Traffic__High_Volumes_Sent811
1.54E-14	0.9	1.39E-14	Traffic__High_Volumes_Sent211
1.54E-14	0.9	1.39E-14	Traffic__High_Volumes_Sent277
1.54E-14	0.9	1.39E-14	Traffic__High_Volumes_Sent3
1.54E-14	0.9	1.39E-14	Traffic__High_Volumes_Sent7
1.54E-14	0.9	1.39E-14	Traffic__High_Volumes_Sent6
1.54E-14	0.9	1.39E-14	Traffic__High_Volumes_Sent4
1.54E-14	0.9	1.39E-14	Traffic__High_Volumes_Sent8
1.54E-14	0.9	1.39E-14	Traffic__High_Volumes_Sent2
6.36E-14	0.1	6.36E-15	Access_thru_HIT_Server_Room_Firewall79
6.36E-14	0.1	6.36E-15	Access_thru_HIT_Server_Room_Firewall822
6.36E-14	0.1	6.36E-15	Access_thru_HIT_Server_Room_Firewall39
6.36E-14	0.1	6.36E-15	Access_thru_HIT_Server_Room_Firewall722
6.36E-14	0.1	6.36E-15	Access_thru_HIT_Server_Room_Firewall322

6.36E-14	0.1	6.36E-15	Access_thru_HIT_Server_Room_Firewall89
6.36E-14	0.1	6.36E-15	Access_thru_HIT_Server_Room_Firewall422
6.36E-14	0.1	6.36E-15	Access_thru_HIT_Server_Room_Firewall69
6.36E-14	0.1	6.36E-15	Access_thru_HIT_Server_Room_Firewall622
6.36E-14	0.1	6.36E-15	Access_thru_HIT_Server_Room_Firewall49
6.36E-14	0.1	6.36E-15	Access_thru_HIT_Server_Room_Firewall29
6.36E-14	0.1	6.36E-15	Access_thru_HIT_Server_Room_Firewall222
6.36E-14	0.1	6.36E-15	Access_thru_HIT_Server_Room_Firewall72
6.36E-14	0.1	6.36E-15	Access_thru_HIT_Server_Room_Firewall62
6.36E-14	0.1	6.36E-15	Access_thru_HIT_Server_Room_Firewall82
6.36E-14	0.1	6.36E-15	Access_thru_HIT_Server_Room_Firewall42
6.36E-14	0.1	6.36E-15	Access_thru_HIT_Server_Room_Firewall32
6.36E-14	0.1	6.36E-15	Access_thru_HIT_Server_Room_Firewall22
6.29E-15	0.9	5.66E-15	Traffic__High_Volumes_Sent422
6.29E-15	0.9	5.66E-15	Traffic__High_Volumes_Sent322
6.29E-15	0.9	5.66E-15	Traffic__High_Volumes_Sent622
6.29E-15	0.9	5.66E-15	Traffic__High_Volumes_Sent89
6.29E-15	0.9	5.66E-15	Traffic__High_Volumes_Sent29
6.29E-15	0.9	5.66E-15	Traffic__High_Volumes_Sent39
6.29E-15	0.9	5.66E-15	Traffic__High_Volumes_Sent222
6.29E-15	0.9	5.66E-15	Traffic__High_Volumes_Sent69
6.29E-15	0.9	5.66E-15	Traffic__High_Volumes_Sent822
6.29E-15	0.9	5.66E-15	Traffic__High_Volumes_Sent79
6.29E-15	0.9	5.66E-15	Traffic__High_Volumes_Sent49
6.29E-15	0.9	5.66E-15	Traffic__High_Volumes_Sent722
6.29E-15	0.9	5.66E-15	Traffic__High_Volumes_Sent62
6.29E-15	0.9	5.66E-15	Traffic__High_Volumes_Sent82
6.29E-15	0.9	5.66E-15	Traffic__High_Volumes_Sent72
6.29E-15	0.9	5.66E-15	Traffic__High_Volumes_Sent32
6.29E-15	0.9	5.66E-15	Traffic__High_Volumes_Sent42
6.29E-15	0.9	5.66E-15	Traffic__High_Volumes_Sent22
4.46E-14	0.1	4.46E-15	Coding_Malware9

4.46E-14	0.1	4.46E-15	Coding_Malware22
4.46E-14	0.1	4.46E-15	Coding_Malware
5.27E-14	0.01	5.27E-16	Access_from_AP_to_Mobile_Device4433
5.27E-14	0.01	5.27E-16	Access_from_AP_to_Mobile_Device4431
7.02E-16	0.75	5.27E-16	Malicious_Access_Point4431
5.85E-16	0.9	5.27E-16	Install_Device_Degrading_Malware4433
5.85E-16	0.9	5.27E-16	Install_Device_Degrading_Malware4431
7.02E-16	0.75	5.27E-16	Malicious_Access_Point4433
1.05E-15	0.5	5.27E-16	Mobile_Device_Attaches_to_Malicious_Access_Point4433
1.05E-15	0.5	5.27E-16	Mobile_Device_Attaches_to_Malicious_Access_Point4431
1.71E-15	0.1	1.71E-16	Access_to_Health_IT_OpenEMR411
1.71E-15	0.1	1.71E-16	Access_to_Health_IT_OpenEMR877
1.71E-15	0.1	1.71E-16	Access_to_Health_IT_OpenEMR777
1.71E-15	0.1	1.71E-16	Access_to_Health_IT_OpenEMR811
1.71E-15	0.1	1.71E-16	Access_to_Health_IT_OpenEMR611
1.71E-15	0.1	1.71E-16	Access_to_Health_IT_OpenEMR711
1.71E-15	0.1	1.71E-16	Access_to_Health_IT_OpenEMR111
1.71E-15	0.1	1.71E-16	Access_to_Health_IT_OpenEMR477
1.71E-15	0.1	1.71E-16	Access_to_Health_IT_OpenEMR377
1.71E-15	0.1	1.71E-16	Access_to_Health_IT_OpenEMR311
1.71E-15	0.1	1.71E-16	Access_to_Health_IT_OpenEMR677
1.71E-15	0.1	1.71E-16	Access_to_Health_IT_OpenEMR177
1.71E-15	0.1	1.71E-16	Access_to_Health_IT_OpenEMR3
1.71E-15	0.1	1.71E-16	Access_to_Health_IT_OpenEMR1
1.71E-15	0.1	1.71E-16	Access_to_Health_IT_OpenEMR8
1.71E-15	0.1	1.71E-16	Access_to_Health_IT_OpenEMR4
1.71E-15	0.1	1.71E-16	Access_to_Health_IT_OpenEMR7
1.71E-15	0.1	1.71E-16	Access_to_Health_IT_OpenEMR6
6.98E-16	0.1	6.98E-17	Access_to_Health_IT_OpenEMR622
6.98E-16	0.1	6.98E-17	Access_to_Health_IT_OpenEMR822
6.98E-16	0.1	6.98E-17	Access_to_Health_IT_OpenEMR69

6.98E-16	0.1	6.98E-17	Access_to_Health_IT_OpenEMR422
6.98E-16	0.1	6.98E-17	Access_to_Health_IT_OpenEMR322
6.98E-16	0.1	6.98E-17	Access_to_Health_IT_OpenEMR79
6.98E-16	0.1	6.98E-17	Access_to_Health_IT_OpenEMR89
6.98E-16	0.1	6.98E-17	Access_to_Health_IT_OpenEMR39
6.98E-16	0.1	6.98E-17	Access_to_Health_IT_OpenEMR49
6.98E-16	0.1	6.98E-17	Access_to_Health_IT_OpenEMR722
6.98E-16	0.1	6.98E-17	Access_to_Health_IT_OpenEMR19
6.98E-16	0.1	6.98E-17	Access_to_Health_IT_OpenEMR122
6.98E-16	0.1	6.98E-17	Access_to_Health_IT_OpenEMR32
6.98E-16	0.1	6.98E-17	Access_to_Health_IT_OpenEMR82
6.98E-16	0.1	6.98E-17	Access_to_Health_IT_OpenEMR62
6.98E-16	0.1	6.98E-17	Access_to_Health_IT_OpenEMR72
6.98E-16	0.1	6.98E-17	Access_to_Health_IT_OpenEMR42
6.98E-16	0.1	6.98E-17	Access_to_Health_IT_OpenEMR12
9.19E-20	0.9	8.27E-20	Traffic__High_Volumes_Sent833
9.19E-20	0.9	8.27E-20	Traffic__High_Volumes_Sent81
9.19E-20	0.9	8.27E-20	Traffic__High_Volumes_Sent30
9.19E-20	0.9	8.27E-20	Traffic__High_Volumes_Sent40
9.19E-20	0.9	8.27E-20	Traffic__High_Volumes_Sent60
9.19E-20	0.9	8.27E-20	Traffic__High_Volumes_Sent61
9.19E-20	0.9	8.27E-20	Traffic__High_Volumes_Sent80
9.19E-20	0.9	8.27E-20	Traffic__High_Volumes_Sent333
9.19E-20	0.9	8.27E-20	Traffic__High_Volumes_Sent73
9.19E-20	0.9	8.27E-20	Traffic__High_Volumes_Sent41
9.19E-20	0.9	8.27E-20	Traffic__High_Volumes_Sent83
9.19E-20	0.9	8.27E-20	Traffic__High_Volumes_Sent70
9.19E-20	0.9	8.27E-20	Traffic__High_Volumes_Sent31
9.19E-20	0.9	8.27E-20	Traffic__High_Volumes_Sent71
9.19E-20	0.9	8.27E-20	Traffic__High_Volumes_Sent63
9.19E-20	0.9	8.27E-20	Traffic__High_Volumes_Sent43
9.19E-20	0.9	8.27E-20	Traffic__High_Volumes_Sent433

9.19E-20	0.9	8.27E-20	Traffic__High_Volumes_Sent33
9.19E-20	0.9	8.27E-20	Traffic__High_Volumes_Sent733
9.19E-20	0.9	8.27E-20	Traffic__High_Volumes_Sent633
9.19E-20	0.9	8.27E-20	Traffic__High_Volumes_Sent766
9.19E-20	0.9	8.27E-20	Traffic__High_Volumes_Sent46
9.19E-20	0.9	8.27E-20	Traffic__High_Volumes_Sent355
9.19E-20	0.9	8.27E-20	Traffic__High_Volumes_Sent66
9.19E-20	0.9	8.27E-20	Traffic__High_Volumes_Sent866
9.19E-20	0.9	8.27E-20	Traffic__High_Volumes_Sent655
9.19E-20	0.9	8.27E-20	Traffic__High_Volumes_Sent855
9.19E-20	0.9	8.27E-20	Traffic__High_Volumes_Sent36
9.19E-20	0.9	8.27E-20	Traffic__High_Volumes_Sent755
9.19E-20	0.9	8.27E-20	Traffic__High_Volumes_Sent455
9.19E-20	0.9	8.27E-20	Traffic__High_Volumes_Sent21
9.19E-20	0.9	8.27E-20	Traffic__High_Volumes_Sent233
9.19E-20	0.9	8.27E-20	Traffic__High_Volumes_Sent20
9.19E-20	0.9	8.27E-20	Traffic__High_Volumes_Sent23
9.19E-20	0.9	8.27E-20	Traffic__High_Volumes_Sent26
9.19E-20	0.9	8.27E-20	Traffic__High_Volumes_Sent255
8.18E-20	0.9	7.36E-20	Traffic__High_Volumes_Sent63333
8.18E-20	0.9	7.36E-20	Traffic__High_Volumes_Sent43333
8.18E-20	0.9	7.36E-20	Traffic__High_Volumes_Sent83333
8.18E-20	0.9	7.36E-20	Traffic__High_Volumes_Sent4000
8.18E-20	0.9	7.36E-20	Traffic__High_Volumes_Sent3333
8.18E-20	0.9	7.36E-20	Traffic__High_Volumes_Sent73333
8.18E-20	0.9	7.36E-20	Traffic__High_Volumes_Sent4333
8.18E-20	0.9	7.36E-20	Traffic__High_Volumes_Sent33333
8.18E-20	0.9	7.36E-20	Traffic__High_Volumes_Sent700
8.18E-20	0.9	7.36E-20	Traffic__High_Volumes_Sent8333
8.18E-20	0.9	7.36E-20	Traffic__High_Volumes_Sent8000
8.18E-20	0.9	7.36E-20	Traffic__High_Volumes_Sent800
8.18E-20	0.9	7.36E-20	Traffic__High_Volumes_Sent600

8.18E-20	0.9	7.36E-20	Traffic__High_Volumes_Sent300
8.18E-20	0.9	7.36E-20	Traffic__High_Volumes_Sent3000
8.18E-20	0.9	7.36E-20	Traffic__High_Volumes_Sent7333
8.18E-20	0.9	7.36E-20	Traffic__High_Volumes_Sent7000
8.18E-20	0.9	7.36E-20	Traffic__High_Volumes_Sent6000
8.18E-20	0.9	7.36E-20	Traffic__High_Volumes_Sent400
8.18E-20	0.9	7.36E-20	Traffic__High_Volumes_Sent6333
8.18E-20	0.9	7.36E-20	Traffic__High_Volumes_Sent8444
8.18E-20	0.9	7.36E-20	Traffic__High_Volumes_Sent6444
8.18E-20	0.9	7.36E-20	Traffic__High_Volumes_Sent7444
8.18E-20	0.9	7.36E-20	Traffic__High_Volumes_Sent3111
8.18E-20	0.9	7.36E-20	Traffic__High_Volumes_Sent8111
8.18E-20	0.9	7.36E-20	Traffic__High_Volumes_Sent4444
8.18E-20	0.9	7.36E-20	Traffic__High_Volumes_Sent6111
8.18E-20	0.9	7.36E-20	Traffic__High_Volumes_Sent7111
8.18E-20	0.9	7.36E-20	Traffic__High_Volumes_Sent3444
8.18E-20	0.9	7.36E-20	Traffic__High_Volumes_Sent4111
8.18E-20	0.9	7.36E-20	Traffic__High_Volumes_Sent200
8.18E-20	0.9	7.36E-20	Traffic__High_Volumes_Sent2000
8.18E-20	0.9	7.36E-20	Traffic__High_Volumes_Sent2333
8.18E-20	0.9	7.36E-20	Traffic__High_Volumes_Sent23333
8.18E-20	0.9	7.36E-20	Traffic__High_Volumes_Sent2222
8.18E-20	0.9	7.36E-20	Traffic__High_Volumes_Sent2444
1.02E-20	0.1	1.02E-21	Access_to_Health_IT_OpenEMR63
1.02E-20	0.1	1.02E-21	Access_to_Health_IT_OpenEMR833
1.02E-20	0.1	1.02E-21	Access_to_Health_IT_OpenEMR43
1.02E-20	0.1	1.02E-21	Access_to_Health_IT_OpenEMR71
1.02E-20	0.1	1.02E-21	Access_to_Health_IT_OpenEMR733
1.02E-20	0.1	1.02E-21	Access_to_Health_IT_OpenEMR61
1.02E-20	0.1	1.02E-21	Access_to_Health_IT_OpenEMR83
1.02E-20	0.1	1.02E-21	Access_to_Health_IT_OpenEMR41
1.02E-20	0.1	1.02E-21	Access_to_Health_IT_OpenEMR31

1.02E-20	0.1	1.02E-21	Access_to_Health_IT_OpenEMR80
1.02E-20	0.1	1.02E-21	Access_to_Health_IT_OpenEMR81
1.02E-20	0.1	1.02E-21	Access_to_Health_IT_OpenEMR60
1.02E-20	0.1	1.02E-21	Access_to_Health_IT_OpenEMR33
1.02E-20	0.1	1.02E-21	Access_to_Health_IT_OpenEMR30
1.02E-20	0.1	1.02E-21	Access_to_Health_IT_OpenEMR73
1.02E-20	0.1	1.02E-21	Access_to_Health_IT_OpenEMR333
1.02E-20	0.1	1.02E-21	Access_to_Health_IT_OpenEMR433
1.02E-20	0.1	1.02E-21	Access_to_Health_IT_OpenEMR633
1.02E-20	0.1	1.02E-21	Access_to_Health_IT_OpenEMR70
1.02E-20	0.1	1.02E-21	Access_to_Health_IT_OpenEMR40
1.02E-20	0.1	1.02E-21	Access_to_Health_IT_OpenEMR355
1.02E-20	0.1	1.02E-21	Access_to_Health_IT_OpenEMR46
1.02E-20	0.1	1.02E-21	Access_to_Health_IT_OpenEMR855
1.02E-20	0.1	1.02E-21	Access_to_Health_IT_OpenEMR655
1.02E-20	0.1	1.02E-21	Access_to_Health_IT_OpenEMR66
1.02E-20	0.1	1.02E-21	Access_to_Health_IT_OpenEMR455
1.02E-20	0.1	1.02E-21	Access_to_Health_IT_OpenEMR866
1.02E-20	0.1	1.02E-21	Access_to_Health_IT_OpenEMR36
1.02E-20	0.1	1.02E-21	Access_to_Health_IT_OpenEMR766
1.02E-20	0.1	1.02E-21	Access_to_Health_IT_OpenEMR755
1.02E-20	0.1	1.02E-21	Access_to_Health_IT_OpenEMR133
1.02E-20	0.1	1.02E-21	Access_to_Health_IT_OpenEMR11
1.02E-20	0.1	1.02E-21	Access_to_Health_IT_OpenEMR10
1.02E-20	0.1	1.02E-21	Access_to_Health_IT_OpenEMR13
1.02E-20	0.1	1.02E-21	Access_to_Health_IT_OpenEMR16
1.02E-20	0.1	1.02E-21	Access_to_Health_IT_OpenEMR155
9.08E-21	0.1	9.08E-22	Access_to_Health_IT_OpenEMR6000
9.08E-21	0.1	9.08E-22	Access_to_Health_IT_OpenEMR7000
9.08E-21	0.1	9.08E-22	Access_to_Health_IT_OpenEMR83333
9.08E-21	0.1	9.08E-22	Access_to_Health_IT_OpenEMR4333
9.08E-21	0.1	9.08E-22	Access_to_Health_IT_OpenEMR4000

9.08E-21	0.1	9.08E-22	Access_to_Health_IT_OpenEMR6333
9.08E-21	0.1	9.08E-22	Access_to_Health_IT_OpenEMR3333
9.08E-21	0.1	9.08E-22	Access_to_Health_IT_OpenEMR3000
9.08E-21	0.1	9.08E-22	Access_to_Health_IT_OpenEMR8000
9.08E-21	0.1	9.08E-22	Access_to_Health_IT_OpenEMR700
9.08E-21	0.1	9.08E-22	Access_to_Health_IT_OpenEMR63333
9.08E-21	0.1	9.08E-22	Access_to_Health_IT_OpenEMR800
9.08E-21	0.1	9.08E-22	Access_to_Health_IT_OpenEMR600
9.08E-21	0.1	9.08E-22	Access_to_Health_IT_OpenEMR73333
9.08E-21	0.1	9.08E-22	Access_to_Health_IT_OpenEMR400
9.08E-21	0.1	9.08E-22	Access_to_Health_IT_OpenEMR7333
9.08E-21	0.1	9.08E-22	Access_to_Health_IT_OpenEMR43333
9.08E-21	0.1	9.08E-22	Access_to_Health_IT_OpenEMR300
9.08E-21	0.1	9.08E-22	Access_to_Health_IT_OpenEMR8333
9.08E-21	0.1	9.08E-22	Access_to_Health_IT_OpenEMR33333
9.08E-21	0.1	9.08E-22	Access_to_Health_IT_OpenEMR8111
9.08E-21	0.1	9.08E-22	Access_to_Health_IT_OpenEMR3111
9.08E-21	0.1	9.08E-22	Access_to_Health_IT_OpenEMR7111
9.08E-21	0.1	9.08E-22	Access_to_Health_IT_OpenEMR4444
9.08E-21	0.1	9.08E-22	Access_to_Health_IT_OpenEMR4111
9.08E-21	0.1	9.08E-22	Access_to_Health_IT_OpenEMR6444
9.08E-21	0.1	9.08E-22	Access_to_Health_IT_OpenEMR3444
9.08E-21	0.1	9.08E-22	Access_to_Health_IT_OpenEMR7444
9.08E-21	0.1	9.08E-22	Access_to_Health_IT_OpenEMR8444
9.08E-21	0.1	9.08E-22	Access_to_Health_IT_OpenEMR6111
9.08E-21	0.1	9.08E-22	Access_to_Health_IT_OpenEMR13333
9.08E-21	0.1	9.08E-22	Access_to_Health_IT_OpenEMR1000
9.08E-21	0.1	9.08E-22	Access_to_Health_IT_OpenEMR1333
9.08E-21	0.1	9.08E-22	Access_to_Health_IT_OpenEMR100
9.08E-21	0.1	9.08E-22	Access_to_Health_IT_OpenEMR1444
9.08E-21	0.1	9.08E-22	Access_to_Health_IT_OpenEMR3222

431 **7 TESTS PERFORMED IN SECURITY CONTROLS ASSESSMENT**

Test ID	CSF Subcategory	Related NIST 800-53 Control	Evaluation Objective	Evaluation Steps	Evidence of Conformance
1	PR.AC-1 Identities and credentials are managed for authorized devices and users	AC-2	Architecture accounts for multiple user roles the access privileges assigned to each role.	Log on to OpenEMR as an administrator to verify the account types specified that will allow the least privileged access necessary for a user to perform their job function.	The solution has the capability to allow multiple privilege and role levels.
2	PR.AC-1 Identities and credentials are managed for authorized devices and users	AC-2	Only currently authorized users are able to access the EHR data.	Test the system applies access controls: a) After verifying roles in OpenEMR, enter credentials for two users and two devices, no users for third device; b) show a user can access authorized device but not the third one; c) delete one user's credentials; d) show that user can no longer log in	- No EHR information can be accessed unless authorized credentials are used. - A mechanism exists for a privileged user to add/modify/remove access.
3	PR.AC-3 Remote access is managed	IA-3	Unknown devices are challenged when attempting to connect/unknown devices are unable to connect to the EHR system.	Test: a) attempt to access OpenEMR using a device that does not have a valid certificate.	The EHR system recognizes the device as an unknown and either deny access completely or demands additional authentication before establishing connectivity.

4	PR.AC-3 Remote access is managed	AC-17	Connection to the EHR system is permitted only through specific secure protocols.	Test: a) Using a mobile device, attempt to connect to the EHR application 1) via FTP, port 21; 2) via HTTP port 80.	The EHR system allows connections does not allow access via insecure connections. Only secured and appropriate connection protocols are used.
5	PR.AC-4 Access permissions are managed, incorporating the principles of least privilege and separation of duties.	AC-17, AC-6	System components are configured to allow only authorized access to information.	Inspect component settings (network ACLs, firewall rules, OS permissions, application settings) to verify that mechanisms exists to limit access to only authorized users and services. -Verify that those restricted settings are in place. -Verify that services have the least privileged settings necessary to perform their function and use a default deny approach.	Settings limit access to explicitly allowed systems and users.
6	PR.AC-4 Access permissions are managed, incorporating the principles of least privilege and separation of duties.	AC-6	The system will not allow a user greater access than their assigned role permits.	Test the system applies access controls: a) log in as a privileged user; logout. b) log in as a user with no special privileges, attempt to gain privileged access.	The non-privileged user does not gain additional privileges.
7	PR.AC-4 Access permissions are managed, incorporating the principles of least privilege and separation of duties.	IA-5	Application and system components contain a mechanism to allow the auditing of privileged functions.	Within the application, examine settings to identify whether the components used in the solution provide an audit capability that will indicate when privileged use has been employed.	An audit capability exists and can be employed when implemented in a production environment.

8	DE.CM-4: Malicious code is detected	SI-3	Malicious code (anti-virus software) protection is installed on mobile devices.	1) Examine mobile devices to verify that malicious code protection is installed. 2) Inspect the signature file to ensure that the code protection software is current.	Malicious code/anti-virus software is installed.
9	DE.CM-4: Malicious code is detected	SC-35	The EHR application will not permit malicious code to be uploaded.	1) Inspect the OS to ensure that malicious code protection is installed. 2) Test: Attempt to upload a European Institute for Computer Antivirus Research (EICAR) standard anti-virus test file within the application. Verify that the virus scanner responds as if it found a harmful virus. 3) Attempt to upload an EICAR test file that has been compressed. 4) Attempt to upload an EICAR test file that has been archived.	The application should detect/quarantine all attempts to upload malicious files.
10	DE.CM-5: Unauthorized mobile code is detected	SC-18	Verify that only mission appropriate content may be uploaded within the application.	Test: 1) Log in to the OpenEMR application. 2) Identify fields within the application requiring user input. 3) Attempt to upload multiple file types including those containing HTML and JavaScript that contain script code.	The application should employ functionality to restrict upload of file types to those expressly required for operations (e.g., TIFF, JPEG, and PDF).
11	PR.DS-1: Data-at-rest is protected	SC-28	Data within EHR is accessible only to authorized users and services.	Inspect: 1) Verify that encryption tools are employed by reviewing configuration settings or available logs or records to confirm that the installed encryption tools or software are operational. Document how it is implemented for the EHR data. 2) Indicate the encryption type in use and whether it is embedded in the EHR product or a separate mechanism. 3) Identify any non-cryptographic mechanisms employed to protect data (file share scanning, and integrity protection).	Data is protected during storage and processing.

12	PR.AC-3 Remote access is managed	AC-17(1)	Remote access to the EHR is monitored and controlled by access type, preventing unauthorized connections	<p>Test:</p> <ol style="list-style-type: none"> 1) Have user A (above) log in via the Internet; logout 2) Have user A try to log in via dial-up. This should fail. 3) Have user B above try to log in via the Internet; this should fail. 4) Have user B log in via dial-up from the authorized source location; logout 5) have user B try to log in via dial-up from an unauthorized source location; this should fail 6) Have users A and C above log in via Internet. Both users attempt to perform a privileged function. Only user C should be successful. 7) Have users B and C log in via dial-up from authorized source locations. Both users attempt to perform a privileged function. Only user D should be successful. 8) Have an unauthorized user X attempt to access the EHR server remotely via dial-up from an authorized location (the location from which user B above is authorized to dial in); this should fail. 	Attempted logins and use of privileged functions is successful or fails as noted in preceding column. This demonstrates that the mechanisms for restricting access based on remote access type are enforced correctly by the EHR server.
13	PR.AC-3 Remote access is managed	AC-17	Only devices with authorized MAC addresses will be granted access to the network.	<ol style="list-style-type: none"> 1) Use an authorized mobile device to log an authorized user into the EHR. 2) Configure that otherwise legitimate mobile device to have a MAC address that is not authorized to access the network and attempt to log on. 3) Verify that the log in attempt will fail. 	MAC address checking is performed.
14	PR.AC-5 Network Integrity is protected, incorporating network segregation where appropriate	AC-4	Information flow control policy is enforced to control the flow of info between the designated mobile devices and the EHR server.	<p>Test:</p> <ol style="list-style-type: none"> 1) Attempt to send EHR information from one mobile device directly to the other via the EHR application. 2) Attempt to perform IP spoofing on the server OS. Command for evaluating on Linux: <pre>ls /proc/sys/net/ipv4/conf/*/rp_filter cat /proc/sys/net/ipv4/conf/*/rp_filter grep rp_filter /etc/sysctl.conf</pre> 	<ol style="list-style-type: none"> 1) EHR information will not be accessible directly from device to device. 2) The system is protected from packets transmitted from a masquerading server.

15	PR.DS-2: Data-in-transit is protected	SC-8 SC-13	The confidentiality and integrity of EHR information is protected while in transit (SC-8) using a cryptographic mechanism	Examine transmission settings. Verify the encryption mechanisms in place when transmitting data. Test: 1) Set up Wireshark to eavesdrop on link between mobile device and EHR server and start capturing packets (A hub can be placed between the wireless access point and the wired network and Wireshark run on a computer connected to the hub.) 2) Send EHR info from mobile device to EHR server 3) Turn off packet capture 4) Examine packet capture to verify that a digital signature was sent with the EHR info transmitted. 5) Calculate what the digital signature should be for this EHR and verify that it is the same as the value that was transmitted. 6) Verify that the packets containing health information are encrypted exactly as they should be given the encryption algorithm used.	FIPS 140-2 compliant mechanism is used to secure data in transit.
16	PR.PT-4: Communication and control networks are protected	SC-7	All Wi-Fi-related products in the system conform to IEEE 802.11i and IEEE 802.1X standards.	Consult WiFi Alliance online list of Wi-Fi Certified products to verify that all mobile devices and access points used in the system are Wi-Fi Alliance certified in the three security areas of: 1) <u>WPA2™</u> (Wi-Fi Protected Access® 2) EAP (Extensible Authentication Protocol), and 3) Protected Management Frames.	Devices in use are Wi-Fi Certified.
17	PR.PT-4: Communications and control networks are protected	SC-7	Wired network is hardened (EHR server is protected by a firewall, antivirus software, and an IDS, and all patching is up-to-date)	Inspect wired network to verify presence of firewall, antivirus software, and an IDS. Confirm that all patching is up-to-date	Wired network has listed security components installed.
18	PR.PT-4: Communications and control networks are protected	SC-7	Mobile Device (wireless client) is hardened in general.	Mobile Device has a firewall, antivirus software, and an IDS installed, its patching is up-to-date, 802.11 ad hoc mode is disabled, and Bluetooth is turned off by default.	Mobile device has listed security components installed

19	PR.PT-4: Communications and control networks are protected	SC-7	The application accepts connections from only those devices hardened in compliance with security policy.	<ol style="list-style-type: none"> 1. Use a mobile device to successfully log in to OpenEMR. Log out. 2) Turn Bluetooth on that mobile device and attempt to log in to the EHR. 3) Verify that the mobile device can no longer login to the EHR server. 	Non-compliant mobile devices may not access the OpenEMR application.
20	PR.PT-4: Communications and control networks are protected	SC-7	A mobile device's configuration goes out of compliance while logged in.	<ol style="list-style-type: none"> 1) Use a mobile device to successfully log in to OpenEMR. 2) While logged in to the OpenEMR, turn on Bluetooth for that mobile device. 3) Verify that the mobile device is not visible to other devices 	Mobile devices outside of the EHR application are unable to connect to a mobile device accessing OpenEMR.

433 8 RISK QUESTIONNAIRE FOR HEALTH CARE ORGANIZATIONS SELECTING A 434 CLOUD-BASED ELECTRONIC HEALTH RECORD PROVIDER

435 8.1 Introduction

436 Health care organizations with limited resources and capital may, based on their individual
437 enterprise risk assessment, choose cloud-based services to provide health care IT for clinicians
438 and administrators. Since cloud computing resources are often shared by multiple tenants and
439 hosted outside a health care organization's perimeters, and data is transmitted through the
440 public Internet, health care organizations should become educated about the potential risks of
441 using the cloud for their health care IT needs.

442 The functionalities provided, service levels offered, and the ability to achieve compliance with
443 legal, regulatory, and security related standards and requirements might differ significantly
444 among different cloud computing vendors. The Office of the National Coordinator for Health
445 Information Technology provides a questionnaire¹³ to help health care organizations shop for a
446 cloud vendor that provides security for health care information and personal privacy along with
447 supports for technical and legal compliance.

448 The questionnaire should not be viewed as an exhaustive arbiter of security when shopping for
449 a cloud provider. Rather, it is intended to help organizations address security concerns in the
450 early stages so that potential threats and vulnerabilities can be mitigated and minimized in the
451 future. We strongly recommended that each organization perform a thoroughly risk assessment
452 before moving to cloud-based health care IT services, and make a strategic decision based on
453 their organization's financial, business operation, and legal and regulatory requirements. We
454 also recommend regular re-assessments when there are significant changes to the
455 organization's environment.

456 8.2 Security Questionnaire

457 1. Vendor Agreements

- 458 a. Is the EHR system vendor willing to sign a comprehensive business service
459 agreement?
- 460 b. Is the EHR system vendor willing to confirm compliance with HIPAA Privacy and
461 Security Rules, and willing to be audited, if requested?

462 2. Third-party Application Integration

- 463 a. Does the health care organization need to integrate the cloud-based EHR system
464 with other in-house products, such as practice management software, billing
465 systems, and email systems?

¹³ Security Risk Assessment Tool, Office of the National Coordinator for Health Information Technology, <http://www.healthit.gov/providers-professionals/security-risk-assessment> [accessed July 15, 2015].

466 b. If integration of the cloud-based EHR system to in-house applications is needed,
 467 what are the implementation procedures and techniques used? What security
 468 features protect the data communicated among different systems?

469 3. Personal or Device Authentication and Authorization

470 a. Does the EHR system vendor restrict the type of mobile devices that can access
 471 the system?

472 b. Are mobile devices subject to some kind of mobile device management control
 473 for enforcing device security compliance?

474 c. Are there any security compliance policies for using a client's own device to
 475 access the cloud-based EHR system?

476 d. If a device is lost, stolen, or found to be hacked, are there any countermeasures
 477 in place to avoid protected data from becoming compromised?

478 e. Does the cloud-based EHR system require a user to be authenticated prior to
 479 obtaining access to patient health information?

480 i. What are the authentication mechanisms used for accessing the system?

481 ii. Are user IDs uniquely identifiable?

482 iii. Is multifactor authentication used? Which factors?

483 iv. If passwords are used, does the vendor enforce strong passwords and
 484 specify the lifecycle of the password?

485 f. Does the system offer a role-based access control approach to restrict system
 486 access to authorized users to different data sources?

487 g. Is the least privilege policy used? (A user of a system has only enough rights to
 488 conduct an authorized action within a system, and all other permissions are
 489 denied by default.)

490 4. Data Protection

491 a. What measures are used to protect the data stored in the cloud?

492 b. What measures are used to protect the data from loss, theft, and hacking?

493 c. Does the system back up an exact copy of protect data? Are these backup files
 494 kept in a different location, well protected, and easily restored?

495 d. Does the system encrypt the protected data while at rest?

496 e. What happens if the EHR system vendor goes out of business? Will all clinical
 497 data and information be retrievable?

498 f. Does the EHR system vendor have security procedures and policies for
 499 decommissioning used IT equipment and storage devices which contained or
 500 processed sensitive information?

501 5. Security of Data in Transmission

502 a. How does the network provide security for data in transmission?

503 b. What capabilities are available for encrypting health information as it is
 504 transmitted from one point to another?

- 505 c. What reasonable and appropriate steps are taken to reduce the risk that patient
506 health information can be intercepted or modified when it is being sent
507 electronically?
- 508 6. Monitoring and Auditing
- 509 a. Are systems and networks monitored continuously for security events?
- 510 b. Does the EHR vendor log all the authorized and unauthorized access sessions
511 and offer auditing?
- 512 c. Does the system have audit control mechanisms that can monitor, record, and/or
513 examine information system activities that create, store, modify, and transmit
514 patient health information?
- 515 d. Does the system retain copies of its audit/access records?
- 516 e. How does the EHR system vendor identify, respond to, handle, and report
517 suspected security incidents?
- 518 7. Emergencies
- 519 a. Does the EHR system vendor offer the ability to activate emergency access to its
520 information system in the event of a disaster?
- 521 b. Does the EHR system vendor have policies and procedures to identify the role of
522 the individual responsible for accessing and activating emergency access
523 settings, when necessary?
- 524 c. Is the EHR system designed to provide recovery from an emergency and resume
525 normal operations and access to patient health information during a disaster?
- 526 8. Customer and Technical Support
- 527 a. What is included in the customer support / IT support contract and relevant
528 service level agreements?
- 529 b. Can the HER system vendor provide a written copy of their security and privacy
530 policies and procedures (including disaster recover)?
- 531 c. How often are new features released? How are they deployed?