

Security from an IV&V Perspective

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***How an IV&V Approach can Help you
Achieve Security Compliance***

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Topics

- **Thoughts about Security**
- **What is IV&V?**
- **What an IV&V Visit should be like**
- **IV&V Protocols**
- **How to get IV&V Support**
- **Conclusions**

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Thoughts about Security

- **Security is not a new topic - all computer installations have security**
- **Most current security practices based on NIST and or ANSI requirements**
- **Fiscal Agent Contract will have security provisions**
- **State IT Departments may have security requirements**

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More Security Thoughts

- **HIPAA security rule contains Healthcare specific requirements**
- **HIPAA Privacy and Security require a new look at what you are doing**

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So What is IV&V?

- **Simply, an Independent look (I)**
- **To Verify and Validate (V&V)**
- **A solution to a problem**
- **IV&V looks at process, products, and progress**

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Why Bother to do IV&V

- **Assessor has different experience and knowledge**
- **Outside expert may have more credibility with management**
- **Affordable assistance**
- **Shows “Due Diligence” in case of suit**

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In other Words:

- **Someone not responsible for or a part of the solution or problem looks at the situation, and gives an assessment**
- **To be effective, the “look” must follow a defined process (protocol)**
- **The “someone” must be knowledgeable**
- **There should be a standard for judgment**
- **There must be a formal report**

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IV&V Protocol

- **Any IV&V assessment must follow a protocol**
- **Assessment based on documents, observations, and interviews**
- **Observations and interviews conducted during a site visit**
- **Protocol defines pre visit, visit, and post visit activities that make up an assessment**

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Pre-Visit Activities

- **Develop a checklist**
 - **agree on focus of visit**
 - **select criteria (HIPAA, NIST, or other Standard)**
- **Request and analyze documents**
- **Develop agenda, list of interviewees**

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On-Site Activities

- **Follow agenda:**
 - **Make Observations**
 - **Do interviews**
- **Follow up on findings**
- **Conduct an exit briefing**

Exit briefing is opportunity to communicate key findings to site management

Post-Visit Activities

- **Review new materials**
- **Document Issues (Visit team and Site Staff)**
- **Do formal report**
- **Be available to consult on report contents**

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Focus of IV&V

- **IV&V of most help during the process of changing your security system**
- **It can review risk analyses and plans**
- **IV&V can bring independent review to the question of what “reasonable” means**

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Specific IV&V Areas

- **Focus on the HIPAA Areas:**
 - **Admin procedures**
 - **Physical Safeguards**
 - **Technical Security Services**
 - **Technical Security Mechanisms**
- **Always good to take a look at physical safeguards**

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How to get IV&V Support

- **Contract with a specialist**
- **Get team from another State installation or local university**
- **Trade support with another State**
- **Look to industry sources - e.g., a big insurance company, a professional society**
- **Be inventive**

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Conclusions

- **IV&V can help find holes in security**
- **Outside expert may add credibility to your expression of needs**
- **Short (inexpensive) engagement can pay big dividends**
- **Be inventive in sources for help**