



2011 Veriphyr Survey of Patient Privacy BreachesTop 3 most commonly reported breaches

- - Snooping into medical records of employees
 - Snooping into medical records of friends/family
 - Loss or theft of physical records
- 52% of respondents: organization does not have adequate tools for monitoring inappropriate access to patient data







Security Metrics-Driven Evaluation, Design, Development, & Deployment

Logging Mechanisms

- Mitigate repudiation attacks
- Recreate traces of user activity after a security/privacy breach
- Identify unauthorized access of sensitive data
- Forensic analysis: who, what, when, where, how?







Previous Work

- "Modifying Without a Trace" [IHI'12]
 - General events
 - "view data"
 - "create data"
 - Specific events
 - "view demographics data"
 - "create immunization data"
- Evaluating logging of specific events gives a much better picture







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Previous Work

- "Cataloging and Comparing..." [HealthTech'13]
 - Compiled catalog of data transactions, security events, and log entry content
 - 10 healthcare sources
 - 6 non-healthcare sources
 - Must consider 13 out of 16 to identify 100% of catalog
 - Should not rely on a single source document







Objective

• to observe the current state of logging mechanisms by performing an exploratory case study in which we systematically evaluate logging mechanisms by supplementing the expected results of existing functional black-box test cases to include log output







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Research Questions

- RQ1: What observations can we make to understand why the four studied EHR logging mechanisms do not capture some specific user actions?
- **RQ2:** What observations can we make about the general security of the four studied EHR logging mechanisms?
- RQ3: What principles of logging mechanism design, implementation, and testing may be proposed based on observations of the four studied EHR systems?







Supplementing Existing Black-box Test Cases

- From NIST Approved 2014 Edition Test Procedures for EHR systems
 - Randomly select 10 test criteria
 - Extract 34 individual test cases from the 10 criteria







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Supplementing Existing Black-box Test Cases

- Individual test cases
 - Identify actions taken by the tester in the system
 - Generate expected logging output
 - Toss 4 test cases that had no expected log output
- Example:

"The Tester shall enter the provided demographic test data."







Supplementing Existing Black-box Test Cases

• Expected log entry content:

Based on ASTM International E2147-01 Standard Specification for Audit and Disclosure Logs for Use in Health Information Systems

- Date and time
- Patient Identification
- User Identification
- Type of action
- Identification of the patient data accessed







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Test Cases Summary

• 30 test cases

Test Identification	Test Description	Expected Results	
DTR170.314(a)(3) - 1: Electronically Record Patient Demographics - Required Test Procedure	TE170.314(a)(3) - 1.01: Tester shall select the test data provided in TD170.314(a)(3) - 1 TE170.314(a)(3) - 1.02: Using the Vendor-identified EHR function(s) and three test patients, the Tester shall enter the provided demographic test data_selected in TE170.314.a.3 - 1.01	TE170.314(a)(3) – 1.03: Using the Inspection Test Guide, the Tester shall verify that the patient demographic data entered in TE170.314(a)(3) – 1.02 are entered correctly and without omission, and in conformance with the standards for race, ethnicity and preferred language	
		LOG: The tester shall verify that the act of entering demographic data is recorded by the logging mechanism.	







Electronic Health Record Systems Studied

- OpenEMR v4.1.2
 - Used by an estimated 15,000 physicians
 - "Certified EHR" in the USA
- OSCAR v12.1
 - Used by an estimated 2,000 clinical providers in Canada
- Tolven eCHR v2.1.3
 - Used internationally
 - "Certified EHR" in USA
- WorldVistA v2
 - Version of VistA, developed by US Department of Veterans Affairs
 - "Certified EHR" in USA



Science of Security Lablet





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Evaluation Methodology

- For a default installation of each EHR system
 - Perform each of 30 test cases
 - Use logging interface used to achieve "Certified" status
 - FAIL if expected log output is incorrect, not logged, or missing a required field
 - NA if functionality cannot be located
 - PASS if expected log output is correct with all required data fields







Results

EHR System	Pass		Fail	NA
OpenEMR	17	(62.69%)	10	3
OSCAR	8	(38.1%)	13	9
Tolven eCHR	4	(21.1%)	15	11
WorldVistA	0	(0.00%)	23	7







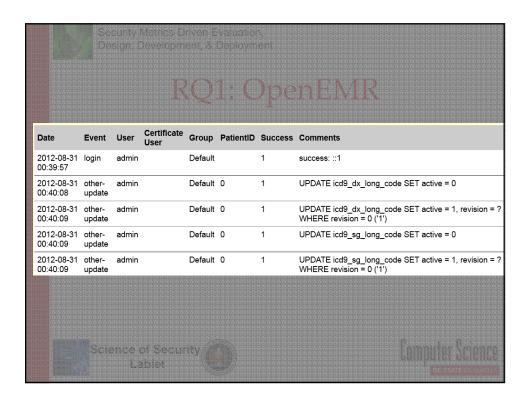
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Research Question 1

 What observations can we make to understand why the four studied EHR logging mechanisms do not capture some specific user actions?







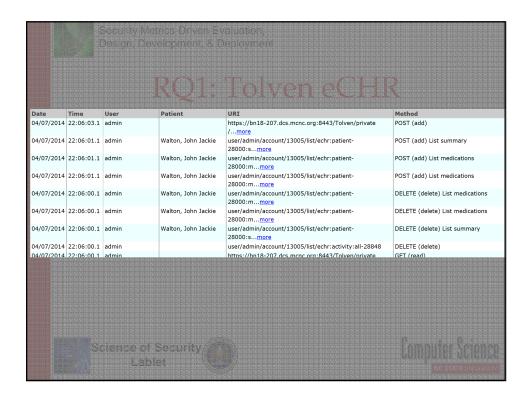


RQ1: OpenEMR

- Logs SQL queries
- Does not log SELECT queries by default
 - 7 "view" test cases fail









RQ1: Tolven eCHR

- "updates" are recorded as "additions"
 - 4 test cases fail
- Stores additional query parameters in database
 - Must have authorized access to database
 - Not viewable in a black-box evaluation





```
DEC 3,2013 19:16
AUDIT TIME USER ID
AUDIT LOG FOR MU LIST
AUDIT ID
                                             AUDIT DATE
USER NAME
ACTION INDICATION
PATIENT ID
PATIENT NAME
                                             NOV 18,2013 18:31:55 1
NOV 18,2013 18:31
 FILE2;109
WVEHR,PATCH INSTALLER
  ZZ PATIENT, TEST TWO
FILE2;110
WVEHR,PATCH INSTALLER
                                            NOV 18,2013 18:31:55 1
NOV 18,2013 18:31
                                                                                       ACCESSED
  ZZ PATIENT, TEST TWO
FILE2;111
KING,JASON
OR CPRS GUI CHART
                                             NOV 18,2013 19:16:19 80 ACCESSED
   ZZ PATIENT, TEST ONE
                                            NOV 18,2013 19:18:34
NOV 18,2013 19:18
FILE2;112
KING,JASON
OR CPRS GUI CHART
                                                                                       ACCESSED
```



RQ1: WorldVistA

- Only data accesses seem to generate log entries
 - No entries indicated "create" "modify" or "delete"
- No human-readable, clear descriptions of event that happened
- 0 passing test cases







Research Question 2

 What observations can we make about the general security of the four studied EHR logging mechanisms?







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Security of Logging Mechanisms

- Administrative users may simultaneously be physicians or other users
 - Saltzer & Schroeder's separation of privilege and least privilege
 - OpenEMR administrative users have direct read/write access to log entry database table







Security of Logging Mechanisms

- CWE532: Information Exposure through Log Files
 - OpenEMR's logged SQL queries can reveal protected information
 - Sensitivity of log content should be considered when granting/revoking access to log entries

INSERT INTO lists (date, pid, type, title) VALUES (NOW(), '1', 'allergy', 'penicillin')







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Security of Logging Mechanisms

- CWE778: Insufficient Logging
 - All 4 EHR systems do not adequately log critical events, such as viewing, by default







Security of Logging Mechanisms

- CWE779: Logging Excessive Data
 - Enabling SELECT logging generates MANY entries
 - View a patient summary record generates 80 entries within 2 seconds







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Security of Logging Mechanisms

- Tolven eCHR and WordVistA
 - Do not log authentication attempts
- All 4 EHR systems
 - Do not log when logs are accessed
 - Security events seem overlooked







Principles

- Log by Default
- Specify Logging Requirements
- Capture Adequate Context
- Support Human-readable Reporting
- Succinctly Represent User Behavior
- Enforce Immutability
- Perform Systematic Black-box Testing







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Future Work

- Extract specific events to log from requirements specifications
- Automate black-box testing of logging mechanisms
- **RQ:** What criteria should be considered when constructing an evaluation framework for evaluating the ability of logging mechanisms to hold users accountable and promote meaningful forensic analysis?
- **RQ:** What metrics can be used to represent the degree to which logging mechanisms promote user accountability?







Summary

- 61 out of 90 (67.8%) of applicable test cases fail
- 6 tests fail in all four EHR systems
 - 4 tests related to viewing protected information
- Our design principles can help guide software engineers when developing logging mechanisms for user accountability, but they are not an exhaustive list of *everything* that should be considered



