Immediately Address IT Access Compliance Challenges with These Techniques, Using Tools You Already Have

Active Learning on how to Deter and Detect
Patient Privacy Violations
and Data Breaches by Insiders

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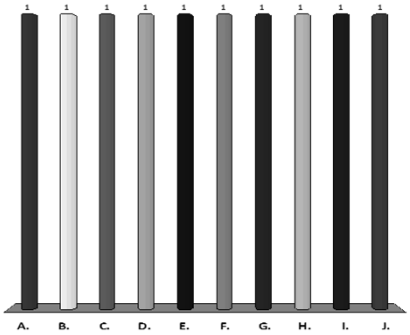
Veriphyr, Inc.

Agenda: IT Compliance Deters and Detects Insider Breaches

- What is IT Access Compliance?
- Insiders more dangerous than outside hackers
  - Insiders = Employees, Contractors, 3rd Parties, Providers
- Characteristics of insider theft and privacy violations
- Why insiders bigger legal issue than hackers or lost/stolen hardware
- How IT access compliance can do what traditional IT security can't
- Practical approaches to IT access compliance you can use immediately

Survey - Your Organization's Focus?

A. Healthcare
B. Insurance
C. Pharma
D. Medical Devices
E. Legal Services
F. Government
G. Other
H. Other/All



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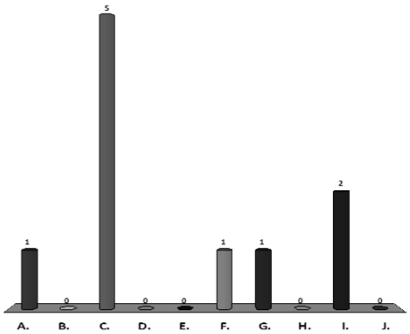
Survey - Your Functional Area?

A. Audit
B. Compliance
C. Compliance & Ethics
D. Ethics
E. Human Resources
F. Info Technology (IT)
G. Legal
H. Privacy
I. Risk Management
J. Other/All



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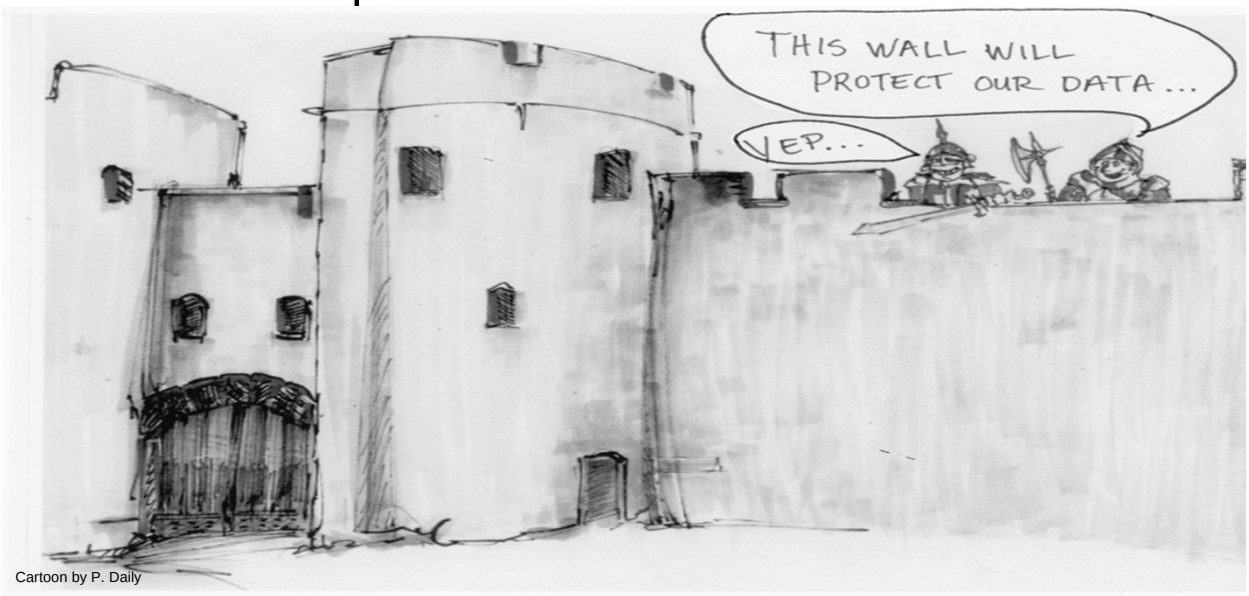
IT Access Compliance

- Only have access rights as required to achieve job objectives
  - user access to systems and applications is reviewed on a periodic basis.
- Only act on data as required to achieve job objectives
  - regularly review records of information system activity

Insider = Employee, Contractor, Provider, 3rd Party or Anyone with Valid Credentials (Username and Password) including hackers with stolen credentials

You Can Keep Out the Hackers…



Cartoon by P. Daily

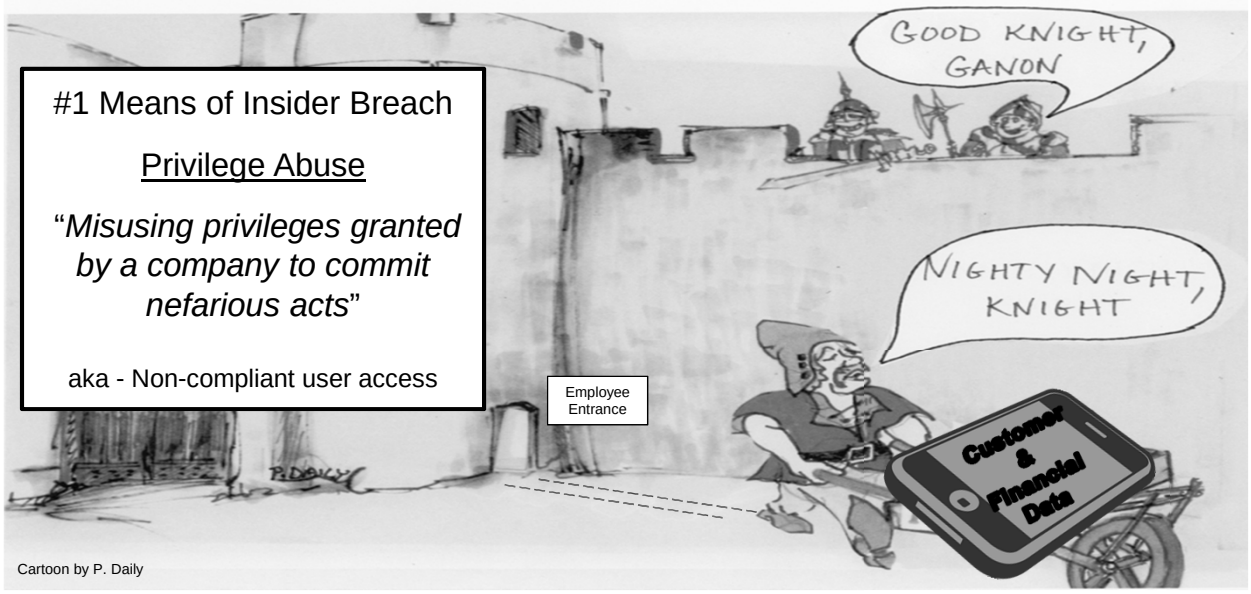
But Not Employees, Contractors, Providers, etc.

#1 Means of Insider Breach

Privilege Abuse

"*Misusing privileges granted by a company to commit nefarious acts*"

aka - Non-compliant user access



Cartoon by P. Daily

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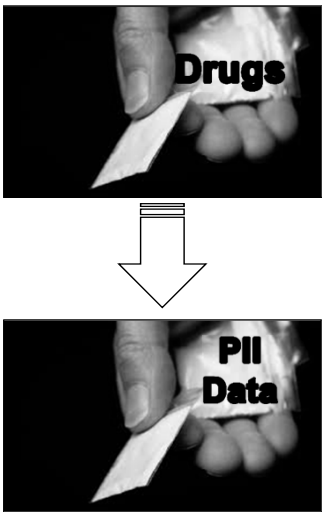
Selling Data Instead of Drugs?

Quotes from FBI Press Release

- "A confidential source (CS) initially approached [criminal] and inquired about purchasing narcotics.
- [Criminal] told the CS that he did not have any narcotics but that he did have personal identity information (PII) that he was willing to sell to the CS….
- [Criminal] provided the CS with specific instructions on what information to enter into the web pages of the Internet-based tax services to obtain a tax refund.
- An examination of the PII revealed that it was from a medical services provider."



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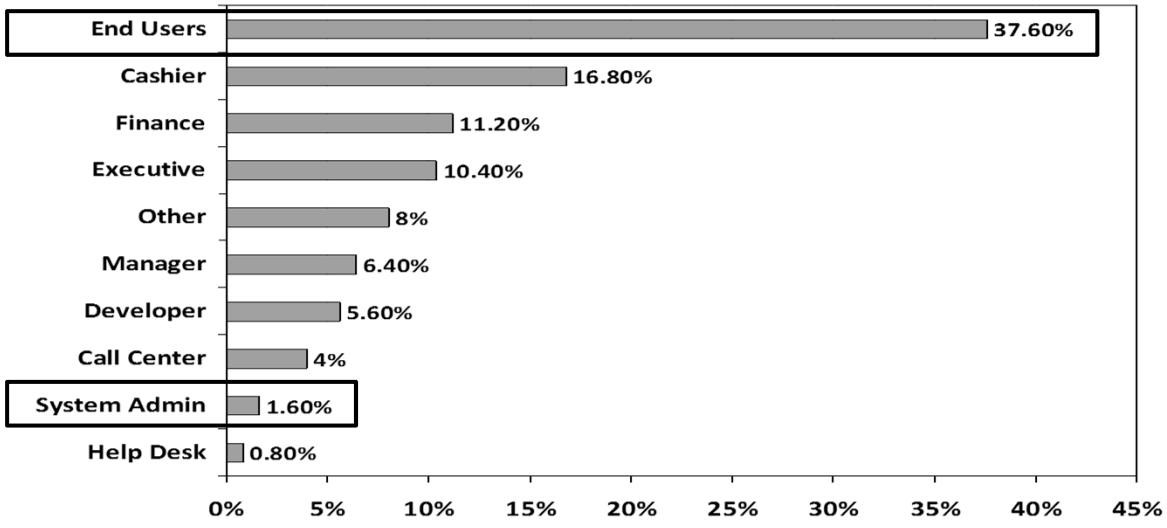
Who Commits Insider Thefts via Privileged Abuse

(Verizon 2015)



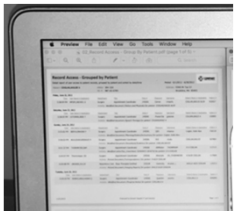
Data Theft via Privilege Abuse by Insiders

- Months and Years Before Discovered
  - 31.25% - stole for months
  - 18.75% - stole for years (source: Verizon)
- No Technical Skills Required
  - Already issued logins and passwords

- Walk Out of Your Organization with Stolen Data on Phone
  - No need to email or upload data to the cloud
  - Just take a photo on smart phone and walk out of the building
  - Print out or e-mail stolen data from home

Hackers vs. Privilege Abuse by Insiders – "Injury in Fact"

- Hacker Steals Patient Data
  - Did customer suffer "injury in fact"?
  - Cases dismissed due to lack of "injury in fact"
    - No clear connection between data theft and identity theft



- Employee Steals Data via Privilege Abuse
  - Local Law Enforcement Bust Local Identify Theft Ring

    "*Among the paperwork were **computer screen-shot** printouts displaying patients' personal information from a **local hospital***" – indictment
  - Did patient suffer "injury in fact"?

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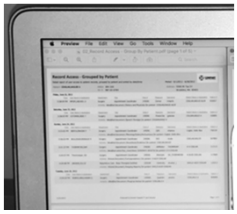
Stolen/Lost Computer vs Insider Theft - "Injury in Fact"

- $4 Billion Lawsuit against Healthcare Org.
  - Computer with PHI stolen
  - Dismissed due to lack of "injury in fact"

    "No proof unauthorized person accessed stolen material."
- Lawsuit - Insider Theft for Identity Theft Ring
  - Police find hospital data and credit statements
  - Would this be "proof unauthorized person accessed stolen material"?
  - Would suit be dismissed?

Patient Hospital Screenshots



Fraudulent Credit Card Statement

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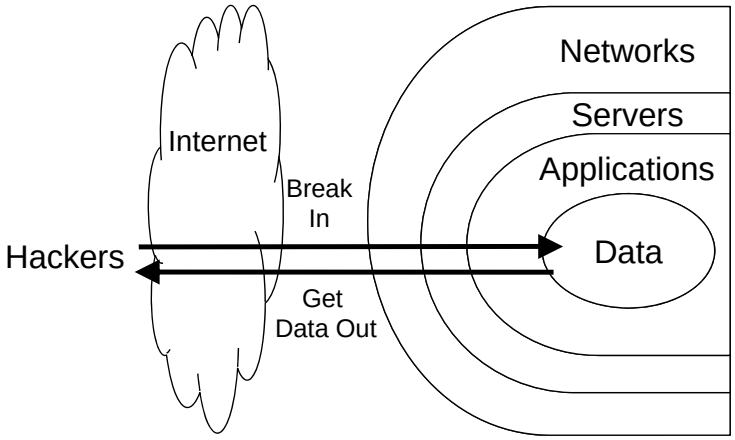
Traditional IT Security is for Outsiders/Hackers

- Focus on the network and not designed for insider privilege abuse

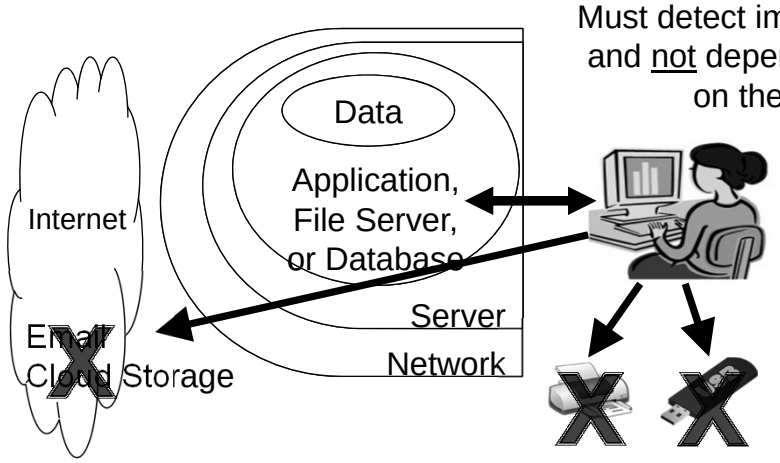


IT Security Technology

- Data Loss Protection (DLP)
- Security Event Mgmt (SEM/SIEM)
- Firewalls
- Intrusion Prevention (IDS/IPS)
- Security Intelligence
- Anti-Phishing
- Anti-Virus
- Anti-Malware

Focusing on Exfiltration is Insufficient

Must detect impermissible use <u>at the source</u> and <u>not</u> depend on infiltration or exfiltration on the network or computer?

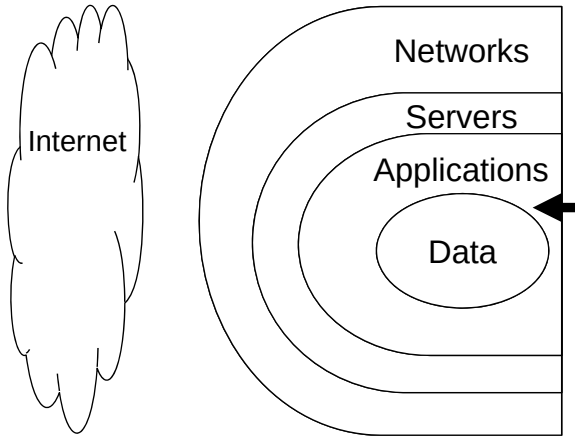


Insider Privilege Abuse
<u>+ Phone w/ Camera</u>
= **Information Compromise**

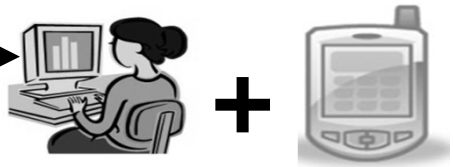
- Just Viewing is a problem
  - Geological survey results
  - M&A insider information
- Just Creating is a problem
  - Fraudulent vendors
- Just Altering is a problem
  - Company financials

Access Compliance is for Data Breach by Insiders

- Addresses privilege abuse of applications and data



Insider Privilege Abuse
+ Smartphone w/ Camera
= **Data Theft**



Answer: Access Compliance

- Restrict access rights to job objectives
- Monitor access activity vs. job objectives

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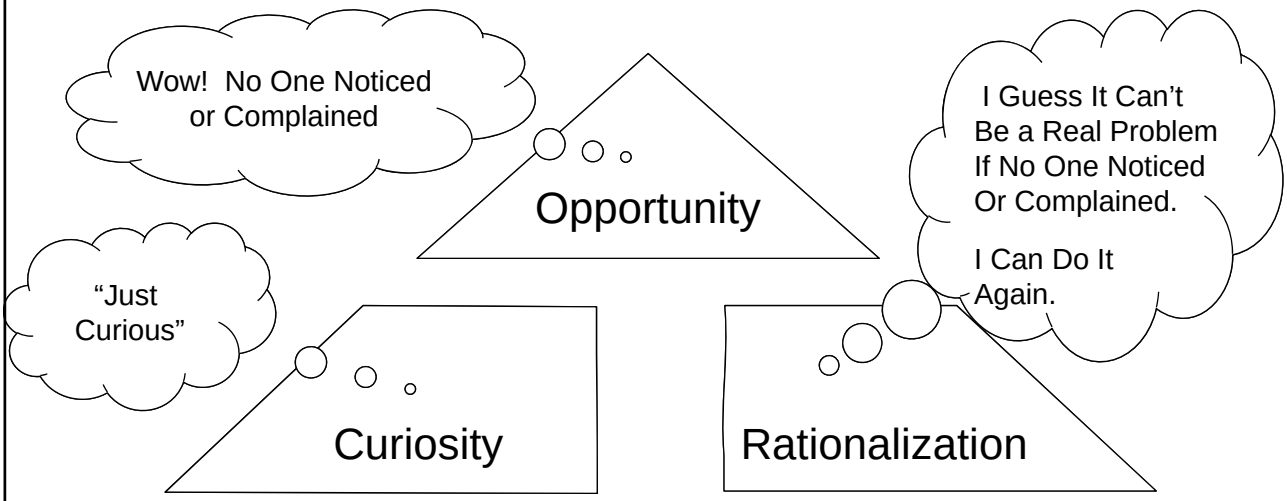
Fraud Triangle, Privacy Breach & Access Non-Compliance



Not Being Caught for Privacy Breach Emboldens Employee Identity Theft

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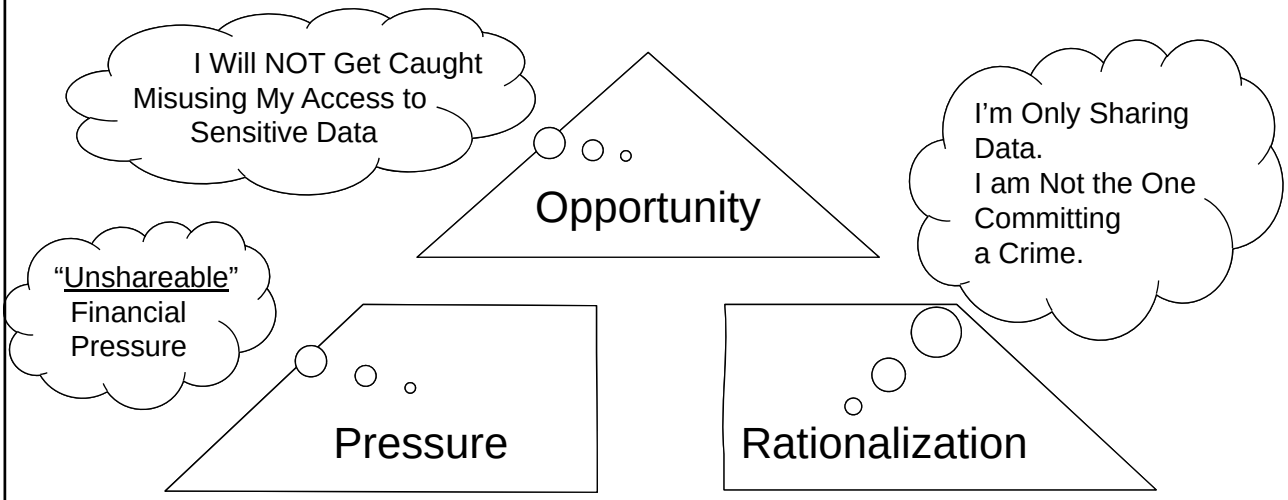
Fraud Triangle, Insider Breaches & Access Non-Compliance



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Detect Malicious Insiders by Understanding Compliant Use

To Detect **Malicious Access & Use**		Understand **Compliant Access & Use**
Access Data or Take Actions **OUTSIDE job objectives**	=!	Access ONLY the Data and Take ONLY the Action **required for job objectives**

Key - Use true peer groups of workers with similar job objectives
- Can't use peer groups based on title and departments or other static label

Group workers by "job"

If workers access or activities are anomalous for the "job"

Then anomalous actions are impermissible use

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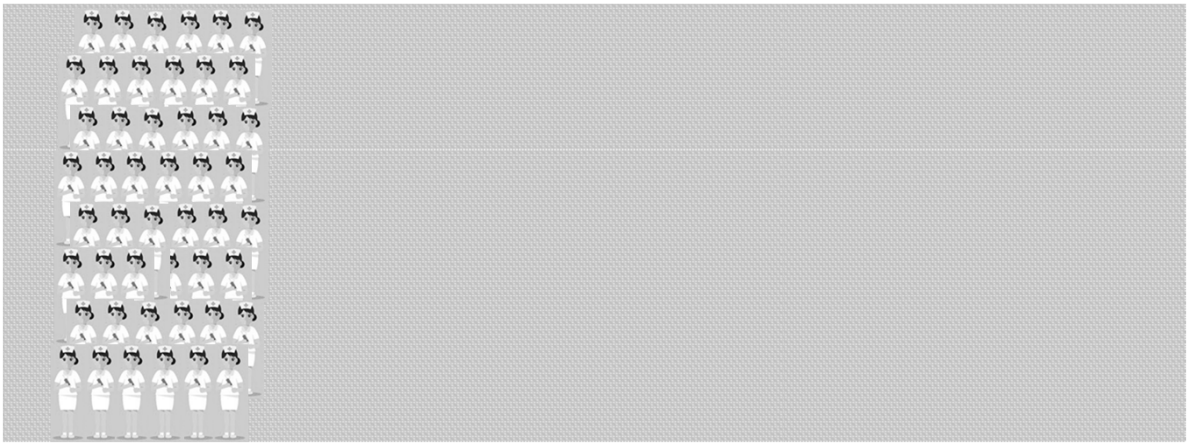
Worker Jobs – Not Titles and Departments

All Outpatient Nurses are NOT All the Same!



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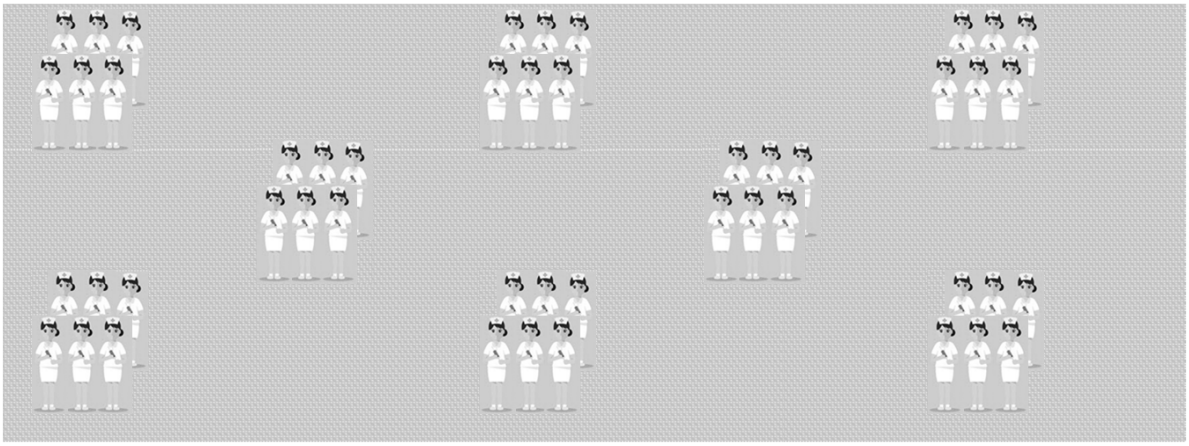
Worker Jobs – Not Titles and Departments

All Outpatient Nurses are NOT All the Same!

Different Jobs Reflected in Differences in What Activities are Permissible Use

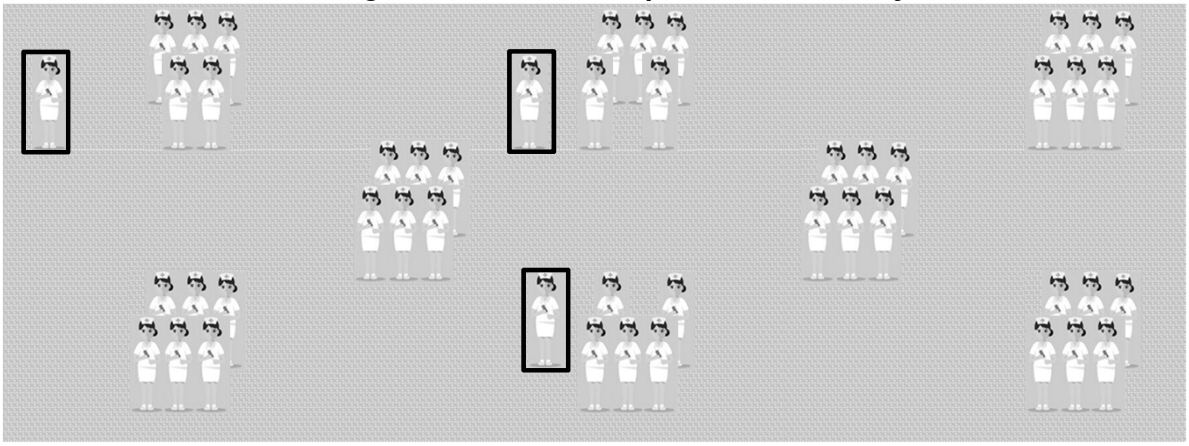


Worker Jobs – Not Titles and Departments

All Outpatient Nurses are NOT All the Same!

Different Jobs Reflected in Differences in What Activities are Permissible Use

Understanding "Jobs" Reveals Impermissible Use by Nurses



IT Compliance to Proactively Detect Privacy Violations and Data Theft

- Employees Doing Similar Jobs Behave Similarly
  - Compare Employee Access Rights to Job Peers to Find Anomalies
  - Compare Employee Activity to Job Peers to Find Anomalies
    - Uses Existing Application Logs of Employee Access to Identity Data
- Investigate Anomalies with Managers and Employee
  - Employees Know They are Being Effectively Monitored
  - Deters Identity Theft (Reducing “Opportunity" in Triangle)
  - Detect Identity Theft in Early Stages
    - Intervene Before Employee Breaks the Law

Walk through examples, then hands on

Attestation of User Access Rights

Manager ZEBRA,ZACKARY

Keep	Drop	Worker	Department	Title	Application	Access Level
		ALFA ALICE	Inpatient	RN	BILLING	2
					Data Warehouse	1
					EHR	2
					FINANCE	4
					HR	4
					Imaging	1
					Pediatrics	1
					Scheduling	3
		ALPHA,ALPHA	Inpatient	RN	EHR	4
					Imaging	5
					Pediatrics	6
					Scheduling	4
		BETA,BETA	Inpatient	RN	EHR	4
					Imaging	5
					Pediatrics	6
					Scheduling	4
		BRAVO, BETTY	Inpatient	RN	BILLING	3
					EHR	3
					FINANCE	5
					HR	5
					Imaging	1
					Pediatrics	2
					Scheduling	4
		CHARLIE, CHARLIE	Inpatient	RN	EHR	4
					Imaging	5
					Pediatrics	6
					Scheduling	4

Access Rights Grouped by User

- What Rights are Inappropriate?
- Insufficient context for manager to make an informed decision

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Attestation of User Access Rights

Manager ZEBRA,ZACKARY
JO Peer Group JOPG-01

Keep	Drop	Application	Worker	Department	Title	Access Level
		BILLING	ALFA ALICE	Inpatient	RN	2
			BRAVO, BETTY	Inpatient	RN	3
			DELTA,DEBBIE	Inpatient	RN	3
			ECHO, EDWARD	Inpatient	RN	3
			FOXTROT, FRANK	Inpatient	RN	3
			GAMMA, GEORGE	Inpatient	RN	3
			KILO, KAREN	Inpatient	RN	3
		Data Warehouse	ALFA ALICE	Inpatient	RN	1
		EHR	ALFA ALICE	Inpatient	RN	2
			BRAVO, BETTY	Inpatient	RN	3
			DELTA,DEBBIE	Inpatient	RN	3
			ECHO, EDWARD	Inpatient	RN	3
			FOXTROT, FRANK	Inpatient	RN	3
			GAMMA, GEORGE	Inpatient	RN	3
			KILO, KAREN	Inpatient	RN	3
		FINANCE	ALFA ALICE	Inpatient	RN	4
			BRAVO, BETTY	Inpatient	RN	5
			DELTA,DEBBIE	Inpatient	RN	5
			ECHO, EDWARD	Inpatient	RN	5
			FOXTROT, FRANK	Inpatient	RN	5
			GAMMA, GEORGE	Inpatient	RN	5
			KILO, KAREN	Inpatient	RN	5
		HR	ALFA ALICE	Inpatient	RN	4
			BRAVO, BETTY	Inpatient	RN	5
			DELTA,DEBBIE	Inpatient	RN	5
			ECHO, EDWARD	Inpatient	RN	5

Access Rights Grouped by Job Objective Peer Groups and by Application

Groups of workers who have the same job objective

Truly similar as opposed to grouping by title or department

- What Rights are Inappropriate?

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User Access Rights Review

Access Rights Grouped by User

Manager	ZEBRA,ZACKARY
Application	(All)
JOPG	(All)

Are they all true peers? What is inappropriate?

Access Level				Applications							
Blank	Worker	Department	Title	Scheduling	Pediatrics	Imaging	HR	FINANCE	EHR	Data Warehouse	BILLING
(blank)	ALFA ALICE	Inpatient	RN	3	1	1	4	4	2	1	2
	ALPHA,ALPHA	Inpatient	RN	4	6	5			4		
	BETA,BETA	Inpatient	RN	4	6	5			4		
	BRAVO, BETTY	Inpatient	RN	4	2	1	5	5	3		3
	CHARLIE, CHARLIE	Inpatient	RN	4	6	5			4		
	DELTA,DEBBIE	Inpatient	RN	4	2	2	5	5	3		3
	DELTA,DELTA	Inpatient	RN	4	6	5			4		
	ECHO, EDWARD	Inpatient	RN	4	2	2	5	5	3		3
	ECHO,ECHO	Inpatient	RN	4	6	5			4		
	FOXTROT, FRANK	Inpatient	RN	4	2	2	5	5	3		3
	FOXTROT,FOXTROT	Inpatient	RN	4	6	4			3		
	GAMMA, GEORGE	Inpatient	RN	4	2	2	5	5	3		3
	GOLF,GOLF	Inpatient	RN		6	5			4		
	KILO, KAREN	Inpatient	RN	4	2	2	4	5	3		3

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User Access Rights Review

Access Rights Grouped by Job Objective Peer Groups

Manager	ZEBRA,ZACKARY
Application	(All)
JOPG	(All)

With true peers the inappropriate access is obvious

Access Level				Applications							
JOPG	Worker	Department	Title	Scheduling	Pediatrics	Imaging	HR	FINANCE	EHR	Data Warehouse	BILLING
JOPG-01	ALFA ALICE	Inpatient	RN	3	1	1	4	4	2	1	2
	BRAVO, BETTY	Inpatient	RN	4	2	1	5	5	3		3
	DELTA,DEBBIE	Inpatient	RN	4	2	2	5	5	3		3
	ECHO, EDWARD	Inpatient	RN	4	2	2	5	5	3		3
	FOXTROT, FRANK	Inpatient	RN	4	2	2	5	5	3		3
	GAMMA, GEORGE	Inpatient	RN	4	2	2	5	5	3		3
	KILO, KAREN	Inpatient	RN	4	2	2	4	5	3		3
JOPG-02	ALPHA,ALPHA	Inpatient	RN	4	6	5			4		
	BETA,BETA	Inpatient	RN	4	6	5			4		
	CHARLIE, CHARLIE	Inpatient	RN	4	6	5			4		
	DELTA,DELTA	Inpatient	RN	4	6	5			4		
	ECHO,ECHO	Inpatient	RN	4	6	5			4		
	FOXTROT,FOXTROT	Inpatient	RN	4	6	4			3		
	GOLF,GOLF	Inpatient	RN		6	5			4		

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Employee, Contractor, and Provider Access to Patient Data

Manager	Delta, Charlie
Department	Inpatient
Title	RN
JOPG	(All)

Anomaly Key: Unique, Rare, Common, Core

User Activity by Title and Department

Is Adam Boy Acting Anomalously?

Worker	Department	Title	Activity-A-10	Activity-A-11	Activity-A-12	Activity-A-13	Activity-A-14	Activity-A-15	Activity-A-16	Activity-A-17	Activity-A-18	Activity-A-19	Activity-A-20	Activity-A-21	Activity-A-22	Activity-A-23	Activity-A-24	Activity-A-25	Activity-A-26	Activity-A-27	Activity-A-28	Activity-A-29	Activity-A-30	Activity-A-31	Activity-A-32	Activity-A-33	Activity-A-34	Activity-A-35	Activity-A-36	Activity-A-37	Activity-A-38	Activity-A-39	Activity-A-40	Activity-A-41	Activity-A-42	Activity-A-43	Activity-A-44	Activity-A-45	Activity-A-46	Activity-A-47
(blank)																																								
Adam,Boy	Inpatient	RN	461	286	5	6			3				21				47		57		28		34					25		39			39		40		36			27
Alpha,Alpha	Inpatient	RN	432	208	17		36	29		29	21		48	42		22	33		24	16		18	30		24	13		20			56	34		40	58		20	20		30
Baker,Baker	Inpatient	RN				16	23			11	16		49	44	32			46	21	11		63		29		29	19	49	31		32	52	51		70	41	37		48	30
Charlie,Charlie	Inpatient	RN	467	290			23		14	9		32	30		34		83	27		36	28		40		21	47			17		59		38	45		16	52		78	
Charlie,David	Inpatient	RN	484	254													61		54		36		22			32		39		37			43		15		20			20
Delta,Delta	Inpatient	RN	400	214	31		33	30		29	5		43	61		15	36		37	23		29			19	15		2	21		51	54		55	69		36	39		30
Echo,Echo	Inpatient	RN	440	330		15				27	3		30	47	10	26		55	22	6		53	45	27		9	27	23	20		41	59	56		70	60	17		51	52
Edward,Frank	Inpatient	RN	450											28			43		57		40		32			46		37		23			51		19		19			22
Foxtrot,Foxtrot	Inpatient	RN	488	271			34		15	27		35	33		59		75	28		54	37		32		3	57		31	37		42		35			24	62		80	
Gamma,Gamma	Inpatient	RN	408	198	19		22	4		9	17		57	44		24	28		42	37		7	47		9	20		18			41	43		58	66		31	49		41
George,Henry	Inpatient	RN	472	291								18					41				49		42			57		33		10			49		19		25			37
Hotel,Hotel	Inpatient	RN	457	294		24	23		10	29	29		44	56		30		55	25	16		46	49	47		15		45	25		39	40	37		62	62	32		69	59
Ida,John	Inpatient	RN	478	257								18		28					71		41									14			53		35		36			23
India,India	Inpatient	RN	454	254			13		36	21		43	30		34		83	37		39	20		46		11	50			15		39		24	24		24	65		63	
Juliett,Juliett	Inpatient	RN	402	188	6		32			22	28		60	54		30	39		34	38		7	47		7	15		8	50		30	35			55		21	32		37
Kilo,Kilo	Inpatient	RN	422	331		13	19		25	29	27		36	51	21	38				1		46	40	42		13	40	31	32		50	38	44		56	52	28		66	46
Kink,Lincoln	Inpatient	RN	925	541								12		67			57		123		70		46			98		88		44			82		64		54			45
Lima,Lima	Inpatient	RN					10		22	17		31	50		36		80	18		50	29		34		23	59		27	45		52		42	29		39	58		68	
Mary,Nancy	Inpatient	RN	451	288													48		75				23					37		18			46		31		19			38
Mike,Mike	Inpatient	RN	414	190	24		32	21		7	14		45	64			40		32	11		29	42		19	27		5	29		55	39		39	70		29	45		36
November,Novem	Inpatient	RN	429	328		30	28		6	14	26		28	30		24		69	25	8		49	31	27		14	18	28	30		47	38	59			57	13		56	56
Oscar,Oscar	Inpatient	RN					30		17			46	48		50		68	33			37		31		26	56		49	41		52		42	42		19	43		59	
Papa,Papa	Inpatient	RN	423	188	17		32	30			11		59	54		21	35		47	18		25	49		22	17		25	20		51	46		55	62		23	41		22
Quebec,Quebec	Inpatient	RN	419	324		22	21		18	14	18		31	30		13		40	10	30		60	20	53		14	11	20	33		29	56			76	52	33		54	54
Sierra,Sierra	Inpatient	RN	429	216	31		34			13	4		44	55		30	14		49	20		12	41		5	13		12	24		45	32		55	54		22	48		47

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Manager	Delta, Charlie
Department	Inpatient
Title	RN
JOPG	(All)

Anomaly Key: Unique, Rare, Common, Core

User Activity by Job Objective Peer Groups

There are clear differences between JOPG

Worker	Department	Title	Activity-A-10	Activity-A-11	Activity-A-12	Activity-A-13	Activity-A-14	Activity-A-15	Activity-A-16	Activity-A-17	Activity-A-18	Activity-A-19	Activity-A-20	Activity-A-21	Activity-A-22	Activity-A-23	Activity-A-24	Activity-A-25	Activity-A-26	Activity-A-27	Activity-A-28	Activity-A-29	Activity-A-30	Activity-A-31	Activity-A-32	Activity-A-33	Activity-A-34	Activity-A-35	Activity-A-36	Activity-A-37	Activity-A-38	Activity-A-39	Activity-A-40	Activity-A-41	Activity-A-42	Activity-A-43	Activity-A-44	Activity-A-45	Activity-A-46	Activity-A-47
JOPG-01																																								
Alpha,Alpha	Inpatient	RN	432	208	17		36	29		29	21		48	42		22	33		24	16		18	30		24	13		20			56	34		40	58		20	20		30
Delta,Delta	Inpatient	RN	400	214	31		33	30		29	5		43	61		15	36		37	23		29			19	15		2	21		51	54		55	69		36	39		30
Gamma,Gamma	Inpatient	RN	408	198	19		22	4		9	17		57	44		24	28		42	37		7	47		9	20		18			41	43		58	66		31	49		41
Juliett,Juliett	Inpatient	RN	402	188	6		32			22	28		60	54		30	39		34	38		7	47		7	15		8	50		30	35			55		21	32		37
Mike,Mike	Inpatient	RN	414	190	24		32	21		7	14		45	64			40		32	11		29	42		19	27		5	29		55	39		39	70		29	45		36
Papa,Papa	Inpatient	RN	423	188	17		32	30			11		59	54		21	35		47	18		25	49		22	17		25	20		51	46		55	62		23	41		22
Sierra,Sierra	Inpatient	RN	429	216	31		34			13	4		44	55		30	14		49	20		12	41		5	13		12	24		45	32		55	54		22	48		47
JOPG-02																																								
Baker,Baker	Inpatient	RN				16	23			11	16		49	44	32			46	21	11		63		29		29	19	49	31		32	52	51		70	41	37		48	30
Echo,Echo	Inpatient	RN	440	330		15				27	3		30	47	10	26		55	22	6		53	45	27		9	27	23	20		41	59	56		70	60	17		51	52
Hotel,Hotel	Inpatient	RN	457	294		24	23		10	29	29		44	56		30		55	25	16		46	49	47		15		45	25		39	40	37		62	62	32		69	59
Kilo,Kilo	Inpatient	RN	422	331		13	19		25	29	27		36	51	21	38				1		46	40	42		13	40	31	32		50	38	44		56	52	28		66	46
November,Novem	Inpatient	RN	429	328		30	28		6	14	26		28	30		24		69	25	8		49	31	27		14	18	28	30		47	38	59			57	13		56	56
Quebec,Quebec	Inpatient	RN	419	324		22	21		18	14	18		31	30		13		40	10	30		60	20	53		14	11	20	33		29	56			76	52	33		54	54
JOPG-03																																								
Charlie,Charlie	Inpatient	RN	467	290			23		14	9		32	30		34		83	27		36	28		40		21	47			17		59		38	45		16	52		78	
Foxtrot,Foxtrot	Inpatient	RN	488	271			34		15	27		35	33		59		75	28		54	37		32		3	57		31	37		42		35			24	62		80	
India,India	Inpatient	RN	454	254			13		36	21		43	30		34		83	37		39	20		46		11	50			15		39		24	24		24	65		63	
Lima,Lima	Inpatient	RN					10		22	17		31	50		36		80	18		50	29		34		23	59		27	45		52		42	29		39	58		68	
Oscar,Oscar	Inpatient	RN					30		17			46	48		50		68	33			37		31		26	56		49	41		52		42	42		19	43		59	
JOPG-04																																								
Adam,Boy	Inpatient	RN	461	286	5		6			3				21			47		57		28		34					25		39			39		40		36			27
Charlie,David	Inpatient	RN	484	254													61		54		36		22			32		39		37			43		15		20			20
Edward,Frank	Inpatient	RN	450											28			43		57		40		32			46		37		23			51		19		19			22
George,Henry	Inpatient	RN	472	291								18					41				49		42			57		33		10			49		19		25			37
Ida,John	Inpatient	RN	478	257								18		28					71		41									14			53		35		36			23
Kink,Lincoln	Inpatient	RN	925	541								12		67			57		123		70		46			98		88		44			82		64		54			45
Mary,Nancy	Inpatient	RN	451	288													48		75				23					37		18			46		31		19			38

Employee, Contractor, and Provider Access to Patient Data

Manager	Delta, Charlie
Department	Inpatient
Title	RN
JOPG	JOPG-04

Anomaly Key: Unique, Rare, Common, Core

Activity for Single Job Objective Peer Groups

Is Adam Boy Acting Anomalously?

Worker	Department	Title	Activity-A-10	Activity-A-11	Activity-A-12	Activity-A-14	Activity-A-17	Activity-A-19	Activity-A-21	Activity-A-24	Activity-A-26	Activity-A-28	Activity-A-30	Activity-A-33	Activity-A-35	Activity-A-37	Activity-A-40	Activity-A-42	Activity-A-44	Activity-A-47	Activity-A-49	Activity-A-51	Activity-A-53	Activity-A-56	Activity-A-58	Activity-A-60	Activity-A-63	Activity-A-65	Activity-A-67	Activity-A-70	Activity-A-72	Activity-A-74	Activity-A-76
JOPG-04																																
Adam,Boy	Inpatient	RN	461	286	5	6	3		21	47	57	28	34		25	39	39	40	36	27	31	42	62	63	80	35	58	44	42	53	41	15	62
Charlie,David	Inpatient	RN	484	254						61	54	36	22	32	39	37	43	15	20	20	36	55	62	40	61		53	52		34	34	14	58
Edward,Frank	Inpatient	RN	450						28	43	57	40	32	46	37	23	51	19	19	22	57	49		70	71	49	41	47	36	35	29	10	51
George,Henry	Inpatient	RN	472	291				18		41		49	42	57	33	10	49	19	25	37	40	42	45	69	64	38			50	34	25	10	49
Ida,John	Inpatient	RN	478	257				18	28		71	41				14	53	35	36	23	52	61	63	44	51	25	41	54	27	60	33	28	47
Kink,Lincoln	Inpatient	RN	925	541				12	67	57	123	70	46	98	88	44	82	64	54	45	116	125	117	96	55	28	82	84	74	105	64	43	92
Mary,Nancy	Inpatient	RN	451	288						48	75		23		37	18	46	31	19	38	57	43	70	44		45	33	39	43	57	38	18	63

Live, Step-by-Step Tutorial of Techniques!

- Using Tools You Probably Already Know and Have
- Using Activity Logs and Identity Data Your Systems Already Produce
- Instructions and Examples
- Discover Identity Theft and Privacy Breach Activity

Hands-on Workshop

- Time for participants to use their own PC and Excel
- Work through real access compliance challenges
  - Identify inappropriate access rights
  - Identify patient privacy violations by insiders
  - Identify data thefts by insiders

Immediately Address IT Access Compliance Challenges with These Techniques, Using Tools You Already Have

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