

Independent health system, \$150M annual revenue, 1,200 employees, 150 active medical staff members, 20+ locations including a multi-site, multi-specialty physician practice, two diagnostics centers, cancer center, and two wellness centers, anchored by a 68-bed full service community hospital





Our Time Together • Pre-Incident Conditions • The Incident • The Response • The Legal Analysis • Preparing for an Incident • Lessening the likelihood of an incident

Pre-Incident Conditions



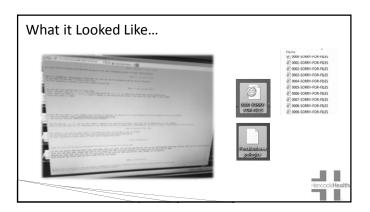
- Most Wired x 3
- Comprehensive HIPAA privacy and security program
- Board and C-Suite support for privacy and security
- Area ERs on diversion due to high census of flu patients
- Heading into a holiday weekend
- Inclement weather approaching

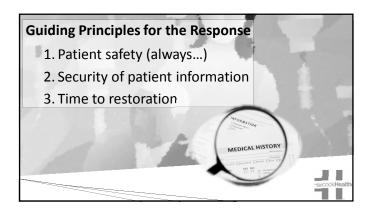


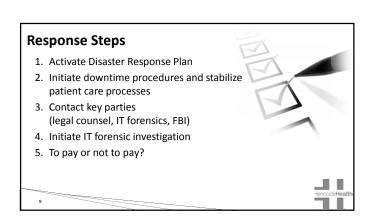
The Incident

- Thursday at 9:30 PM: Messages began appearing on PC screens in the hospital indicating that the system was encrypted with SamSam ransomware and that decryption keys could be purchased with four Bitcoin.
 - One week deadline or data would be encrypted permanently
 - Message included step-by-step instructions for obtaining the decryption keys









1. Activate Disaster Response Plan

- Immediate shut down of all network and desktop systems
 - Manual process involving more than 1,200 units
 - Signs posted at all facilities noting all computers to remain off
- Incident command center established by executive leadership
 - Non-essential staff called-off
 - Communications by cell phone, text and non-system email







Hancock**Heal**t

2. Downtime Procedures and Patient Care

- Ensured patient-facing equipment unaffected
- Patient care staff moved to paper documentation
- ER diversion only until processes established and stabilized
- Patient care continued throughout the incident:
 - Babies were born, surgeries were completed, patients were treated in ER and admitted, imaging and lab testing was performed...we did what a hospital does every day...





3. Contact Key Parties

- Very early Friday morning: Leadership contacted legal counsel
- Legal counsel engaged an experienced IT forensics firm

 Will you be able to use your preferred firms?
- Established schedule of calls to occur every two hours
 - Initial call cadence should be frequent, but can become less frequent as needs dictate.
- FBI contacted and included on calls
 - FBI role is advisory and investigative

Hancock **Health**

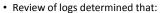
4. Initiate Forensic Investigation

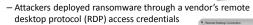
- Four stages:
 - 1. Identification
 - 2. Containment
 - 3. Eradication
 - 4. Remediation
- Failure to follow this process could result in incomplete resolution and continuing incident.



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Forensic Investigation (cont.)





- Limited amount of access time
- No additional accounts created on network
- No lateral movement within network
- No evidence of ePHI exfiltration
- Ransomware was SamSam variant, which intelligence indicated seeks ransom payment only, not data acquisition



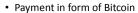
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5. To Pay or not to Pay?• FBI recommends not paying as a

- FBI recommends not paying, as a deterrent
- Fact-sensitive determination
 - Do reliable backups of critical data exist?
 - How long will it take to restore from backups?
 - What is the value of time for the affected provider?
- Risks of payment:
 - Make yourself a future target
 - Don't get data back
 - The attackers ask for more money
- · Success of business model relies on "integrity" of attacke



To Pay or not to Pay? (cont.)





- Once Bitcoin is acquired, must go on the dark web to make payment to attackers.
 - · Must follow instructions precisely
 - Use a secure device to conduct transaction
 - Bitcoin transactions are not instantaneous and can take an hour or more.
 - Then you wait for the attackers to provide the decryption keys





To Pay or not to Pay? (cont.)

- · Decryption keys
 - Could be one key or many keys
 - Decryption process takes time
- Restoring data and bringing systems back online is a slow and deliberate process (much slower???)
- We will show a video of our Bitcoin transaction this evening



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Legal Considerations

- State and federal laws potentially apply
- State laws often focus on risk of identity theft
- HIPAA presumes a breach when Privacy Rule is violated
 - Is all ransomware an unauthorized access/disclosure?
 - Can overcome presumption if able to document that there is a low probability that PHI has been compromised
- Key Factors for ransomware incident:
 - Was ePHI or PII acquired or viewed?
 - Was data availability compromised?



Preparing for an Incident

- Develop incident response plan
- Characteristics of an effective Incident Response Team:
 - Availability
 - Requires complete dedication to the task at hand
 - Selflessness
 - It's not about you, it is about getting it right. No egos allowed.
 - Delegation
 - Trust your team. You can't do it by yourself.
 - Honesty
 - Truth is integral to this process.



Preparing for an Incident (cont.)

- Practice implementing the response plan (table top exercise).
- Obtain cyberliability insurance.
 - Be sure you can utilize your preferred vendors for legal, forensics, credit monitoring, and mailing
 - Ensure coverage is adequate
- Ensure appropriate liability protections in vendor contracts.
- Enable detailed system and application logging.
- Strong day-to-day organizational dynamics and relationships are fundamental to success (marginal performance in good times means implosion during a crisis...)



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Lessening the Likelihood of an Incident

- Conduct enterprise-wide risk analysis
- Develop and implement remediation plan
- Regularly update and patch software and systems
- Implement multi-factor authentication
- Implement a vendor management program



Lessening Incident Likelihood (cont.)

- · Conduct regular workforce training
- · Obtain independent third-party penetration testing
- Implement managed security services to monitor IT activity, vulnerabilities and risks



Resolution*

- Thursday
 - 9:30 PM Cyber-Attack
 - 11:00 PM all systems shut down,
 - Midnight Incident Response Team in place
- Friday
 - Early AM attorneys, IT forensics team in progress
 - Mid-day Cylance installation in progress
 - Afternoon Ransom decision made
 - Evening Bitcoin procured
- Saturday
 - Early AM decryption keys acquired (i.e. ransom paid 4 Bitcoin ~\$55,000)
 - Mid-morning file decryption begins

Sunday

- Morning
 - Servers & PCs operational
- Early evening Critical Systems on line

Monday

- Most systems operational
- Within a few weeks all systems operational
 - Some Outlook calendar files unrecoverable...



Expect the Unexpected... \$20,000,000!!!

