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Outline

Background / Motivation

User-centric Monitoring Agent System

Enabling Actionable Accountability

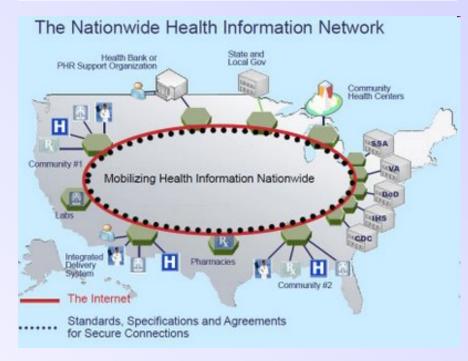
Prototype Implementation & Performance

Conclusions

Background

- Transition from paper-based records to electronic health (medical) record
 - Electronic Health Record (EHR) systems
 - Personal Health Record (PHR) systems
- "Meaningful Use" incentive program by CMS
 - HITECH Act in 2009
- Initiatives for large-scale health information exchange
 - Nationwide Health Information Network (NHIN)
 - NHIN Direct





Misuse of Health Information

In September, 2006, <u>one front desk office</u>
<u>coordinator</u> at Cleveland Clinic in Weston, FL was indicted for committing healthcare fraud. She abused her access privilege to download healthcare records of more than 1,100 patients. She then sold them to <u>her cousin</u>, who owned a medical claims company in Florida and filed false claims to <u>Medicare</u> to gain approximately \$2.8 million.



Data Breach by Insiders

- According to HHS, a large number of data breach cases are caused through lost or stolen devices used in healthcare organizations.
- Yet another possibility...

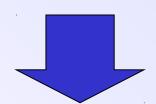




Accountability for EHR Sharing / Usage

 Assurance of knowledge about how an EHR reaches a certain health record consumer

 Providing patients with verifiable evidence about who is involved in the sharing path of a certain EHR



Provide patients with awareness and actionable information Discourage malicious / inappropriate handling by insiders

Related Work

- Information accountability
 - Weitzner et al. (2008)
 - "The use of information should be transparent so it is possible to determine whether a particular use is appropriate ... and that the system enables individuals and institutions to be held accountable for misuse."
 - Visibility, under established rules, can encourage compliance.
- Auditing in healthcare organizations
 - King et al. (2012)
 - Current EHR systems have major weakness with "user-based non-repudiation".
 - Possibility of tampering or forgery by a system administrator
- Data provenance
 - Aldeco-Perez et al. (2008), Kifor et al. (2008) etc.
 - Derivation history of each data
 - Created based on a set of assertions.
 - Centralized assertion store is not often realistic.



User-centric Monitoring Agent

- User-controlled "reference monitor" to mediate accesses to data in a distributed setting
 - Reliable mediation under assumptions reasonable in recent e-healthcare settings

 An online service deployed on an entity trusted (chosen or managed) by each patient



Scope and Assumptions

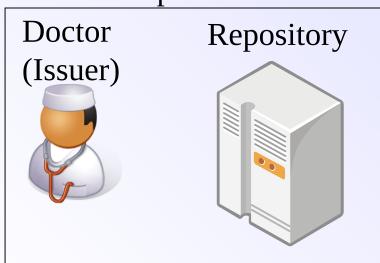
- Allows patients to be aware of by whom and when their health records are <u>meaningfully consumed</u>.
 - Meaningful usage of health records is <u>accompanied by</u> <u>integrity/authenticity verification.</u>
 - Legitimate consumers (Medicare etc.) are naturally motivated to do so.
 - Adversaries can obtain meaningful gain only by presenting health data to legitimate consumers.
 - HIPAA Section 164.520 "Notice of privacy practices"
- A repository accepts new records (or update of record) only under <u>patient's awareness</u>.
 - Justified by patient's right noted in Section 164.524 of HITECH Act.
- PKI is established and every participant is assigned a key pair by one of trust anchors.
 - Under NHIN Direct standards, PKI is required.

Architecture Overview

Monitoring Agent



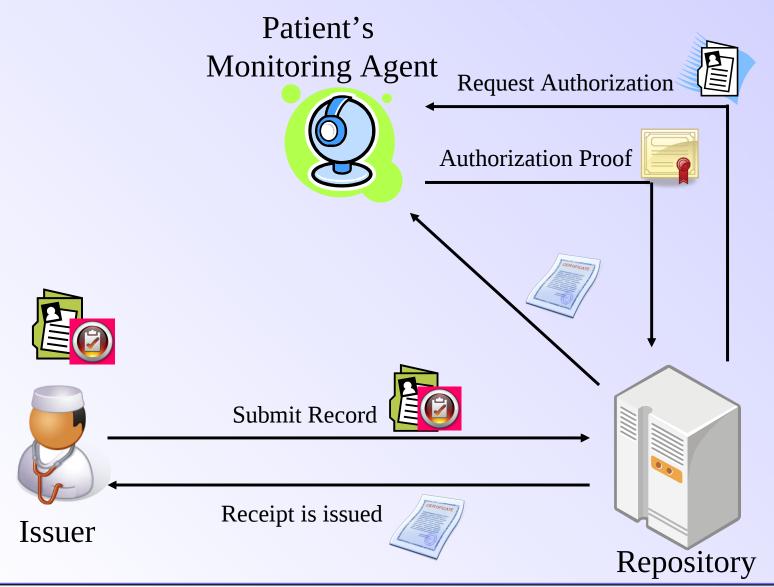
Hospital A



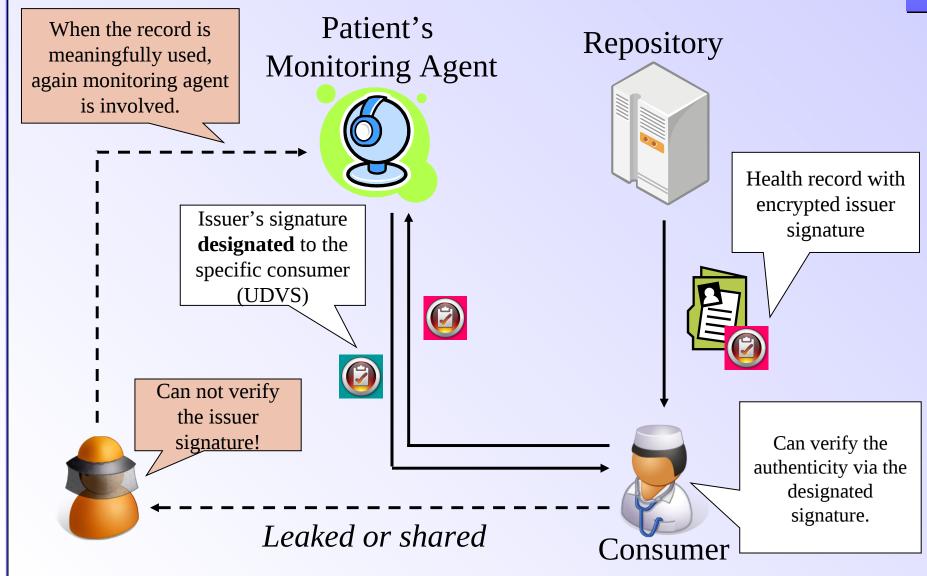
Hospital B



Update of Health Record (Accountable Update)



Usage of Health Record (Accountable Usage)



Enabling Actionable Accountability

Identifying The Source of Breach

- Awareness alone is not sufficient.
 - In case of misuse, it is often not possible to determine the responsible entities.

 Lack of actionable accountability would encourage insider threats.

Accountability Tag

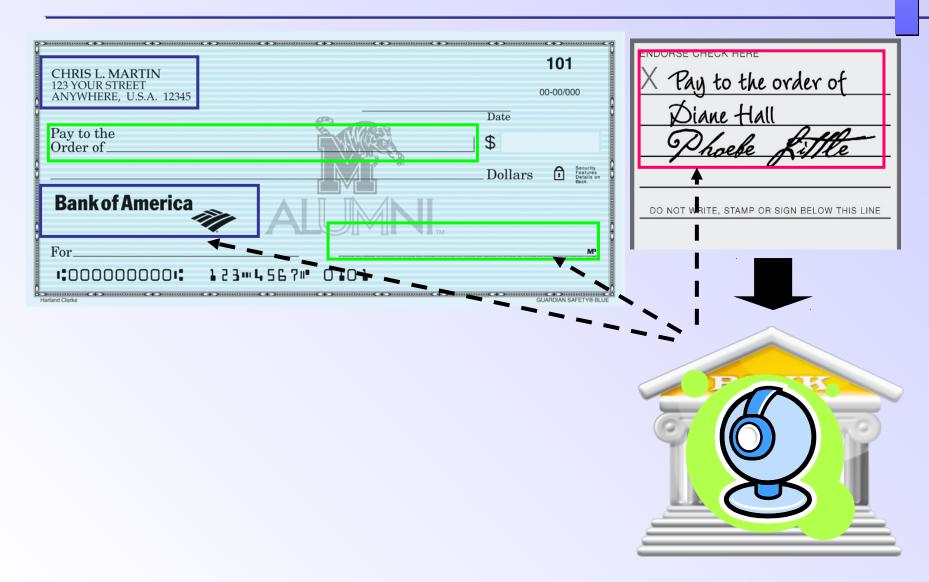
- Metadata that is attached to each copy of healthcare records.
 - Conveys information about the one-hop EHR sharing.
 - Accumulated tags enable a patient to reconstruct the complete sharing path.
- Verified and logged by a patient's monitoring agent when:
 - Accountable Usage is run.
 - A shared record is submitted via Accountable Update.

Accountability Tag

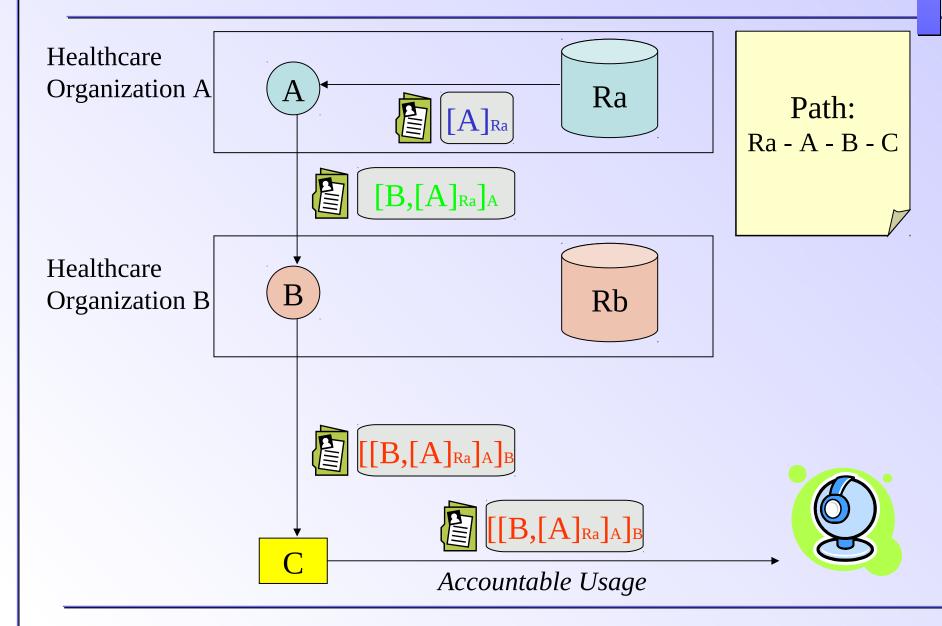
- 3 stages of accountability tags:
 - PreTag
 - Issued (signed) by <u>a repository</u> that releases a healthcare record and signed along with the downloader's (A's) identity.
 - Tag (Activated)
 - Signed by <u>a source of healthcare record sharing</u> (A) with the recipient's (B's) identity.
 - CTag (Confirmed)
 - Signed with <u>the designated recipient</u>'s (B's) private key.



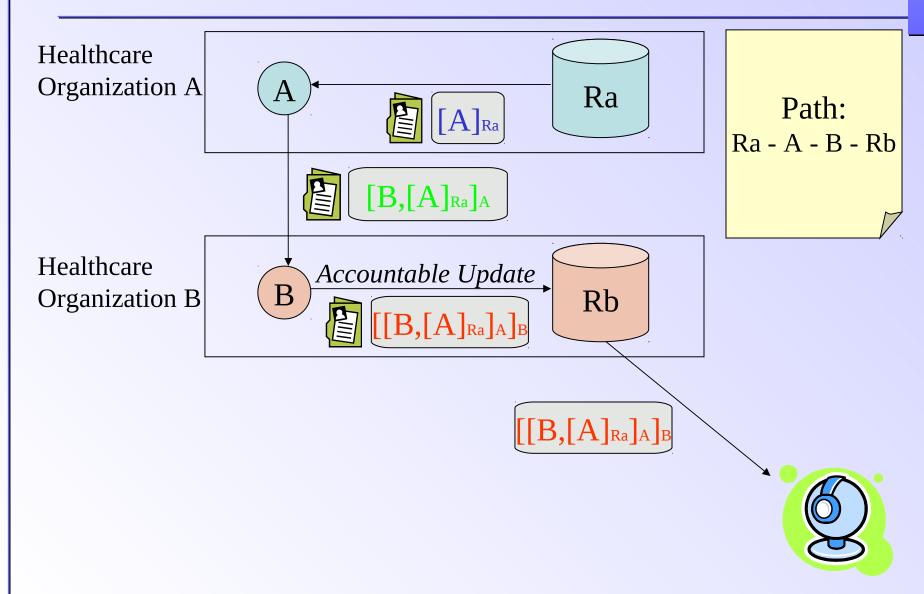
Analogy to Personal Check



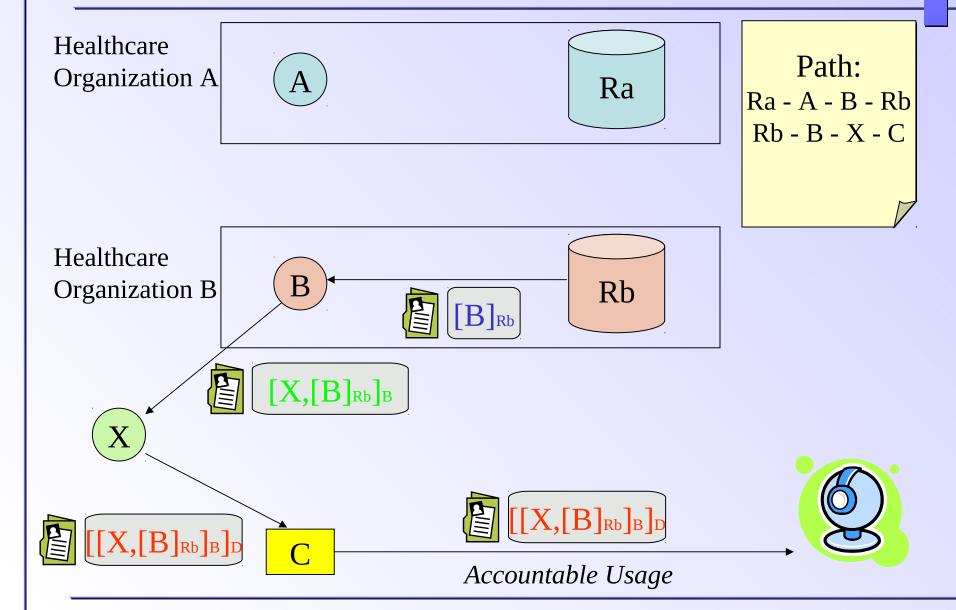
Accountability Tag System



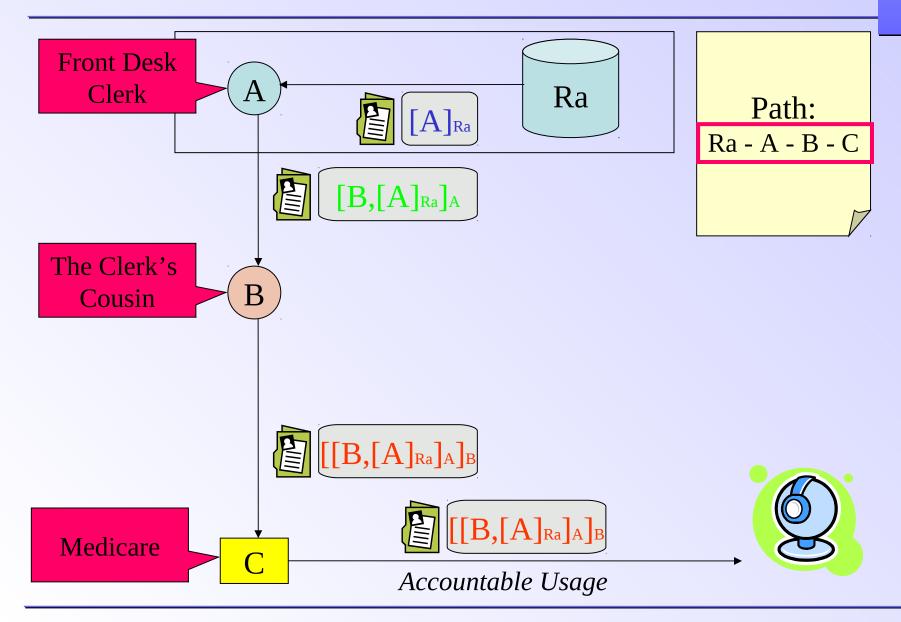
Accountability Tag System

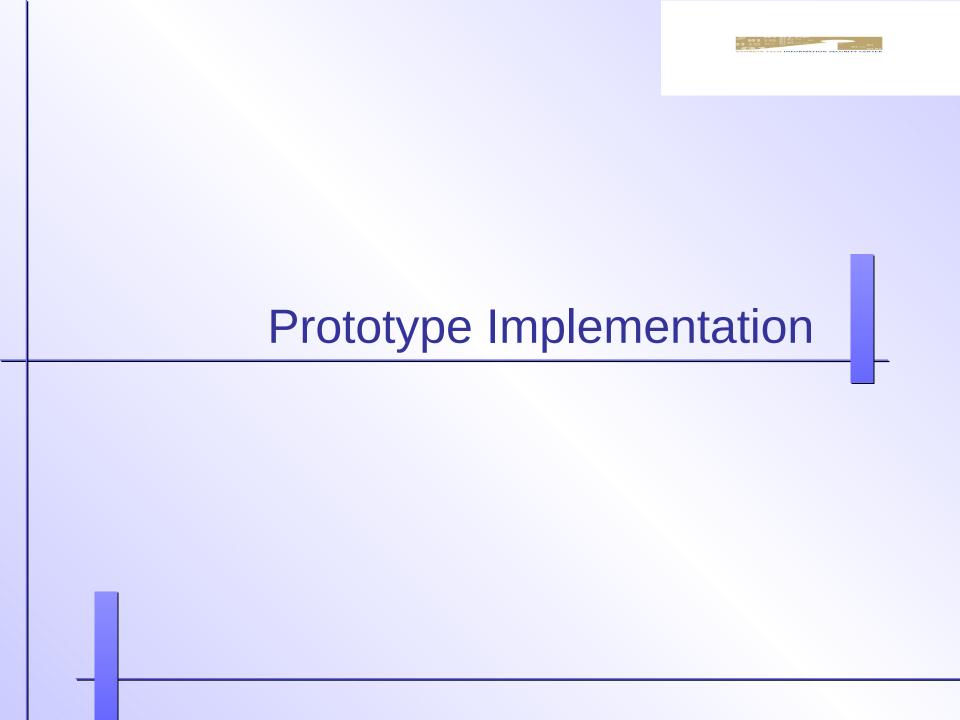


Accountability Tag System

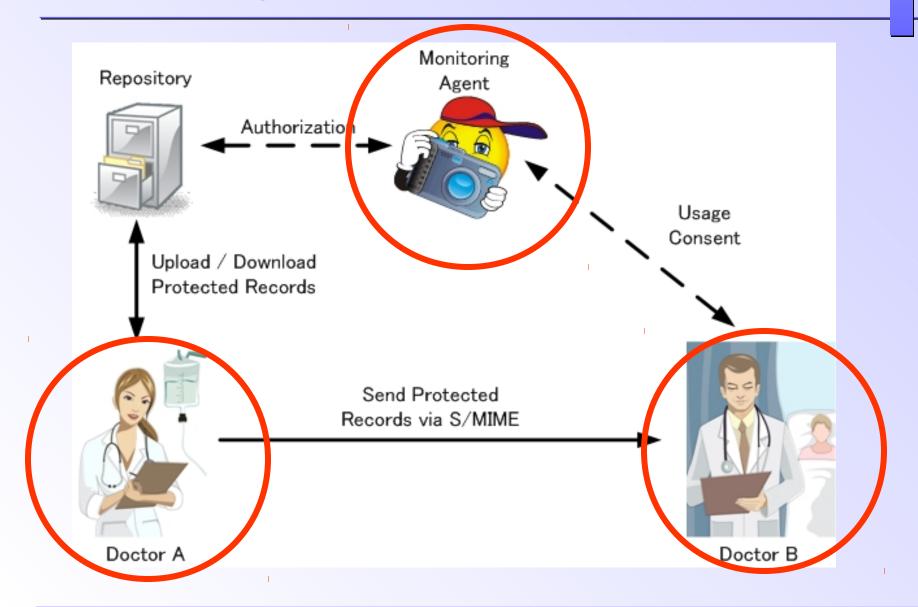


Case Study: Cleveland Clinic Case





Integration in NHIN Direct



Overhead for Robust Accountability

Task	Response Time w/o Acct. Tag [ms]	Response Time w/ Acct. Tag [ms]
Tag Activation	0	15.47 (4.08)
Tag Confirmation	0	15.18 (4.29)
Acct. Usage (3MB)	1,151.33 (113.99)	1,345.83 (106.3)
Acct. Usage (6MB)	1,792.65 (41.58)	1 560 31 (149.28)
Acct. Update (3MB)	4,957.17 (227.27)	4,530.44 (82.35)
Acct. Update (6MB)	9834.60 (62.62)	9,117.53 (123.28)

Overhead for additional accountability guarantee is far less than 1 second.

Conclusions

- Assurance of information accountability
 - A patient can know how the record reached consumers from the source repository.
 - A patient can know which organization stores copies of her records.
- Mitigation of risks owing to lost / stolen health records
 - Absence of an accountability tag does not allow healthcare records to be meaningfully consumed.
- Patient's control over EHR usage / update
 - Implemented through a "black list" on a patient's monitoring agent.

Thank you very much.



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