# EXPRESSO

## The Risk Assessment Express


HIPAA
Survival
Guide

3Lions Publishing, Inc.

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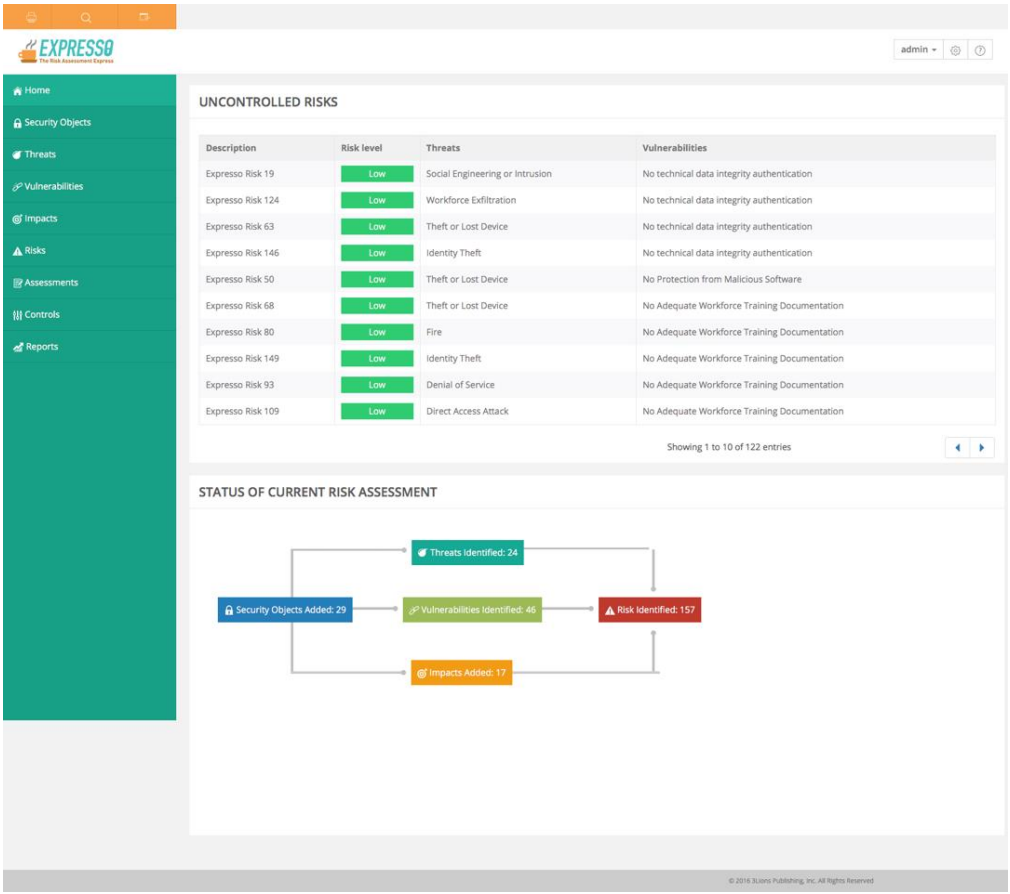
# Introduction

What is Expresso® 2.5? Expresso® 2.5 is a software-as-a-service ("SaaS") that embodies the National Institute of Standards and Technology (NIST) seven (7) step process for performing Risk Assessments. Expresso® builds on the NIST foundation to facilitate performing Risk Assessments by rationalizing the NIST methodology in a manner that makes it accessible to lay persons. What QuickBooks Online ("QBO") did for accounting Expresso® 2.5 does for Risk Assessments and Breach Notification. QBO did not eliminate all the work associated with accounting, but transformed accounting from a necessary evil, something to be avoided at all costs and/or handed over to a third party, to something that a businessperson could master at some basic to intermediate level.

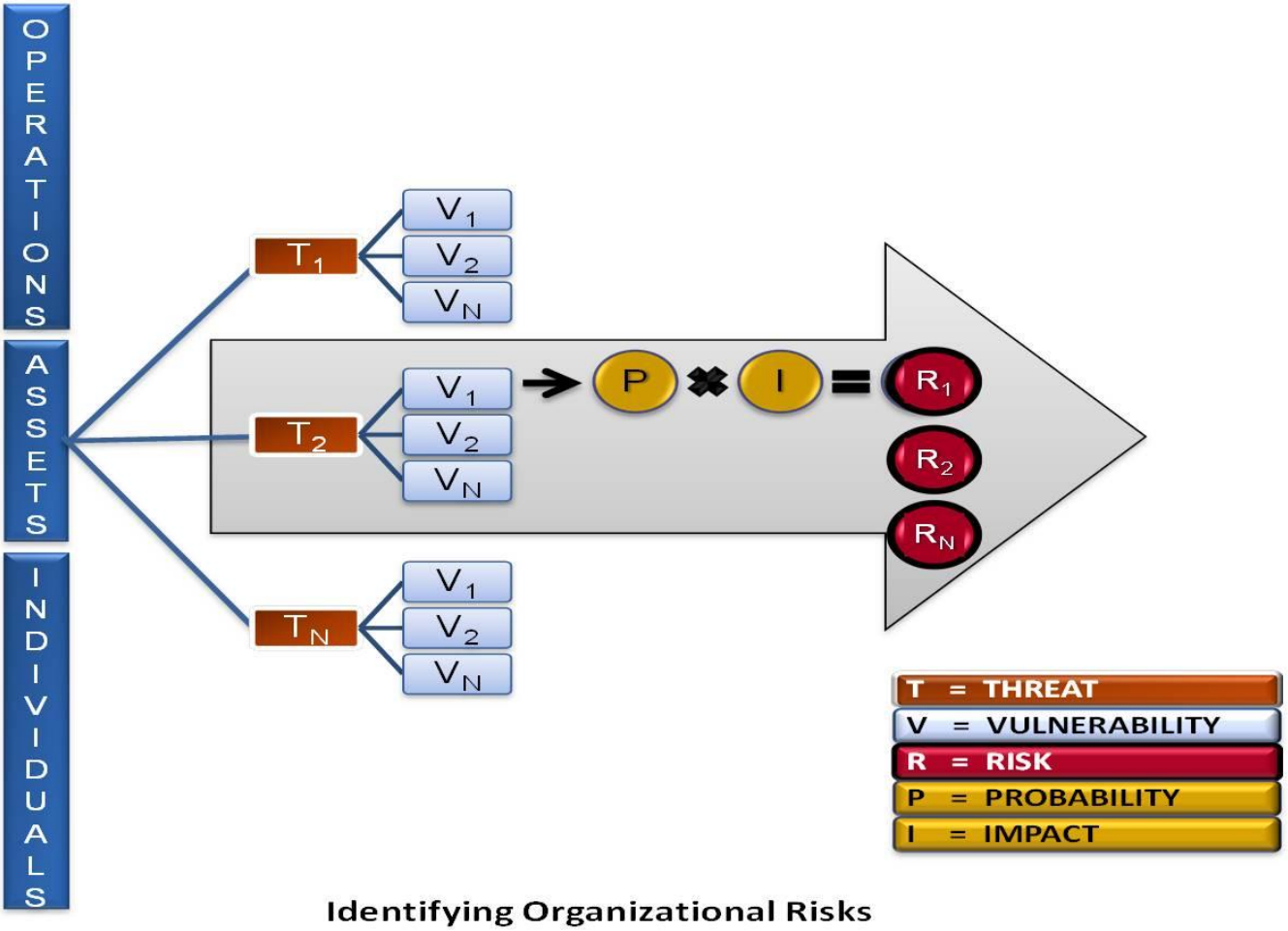



# Risk Assessments

Expresso® comes pre-populated with (T)hreats, (V)ulnerabilities, and potential business (I)mpacts to your organization—making the calculation of (R)isks easier than the tedious process that our competitors offer. In addition to pre-populating Threats, Vulnerabilities and Impacts, Expresso® comes pre-populated with Controls the cover all Security Rule implementation specifications. Expresso® also allows you to modify all pre-populated data in a manner that best fits your organization. The following list summarizes Expresso®'s principal features. Expresso®:

- allows you to bulk import Security Objects (people, places, assets, processes and other things that Security Controls are applied to);
- comes pre-populated with known threats and vulnerabilities to allow for easier pairing of the two;
- allows Security Objects to be categorized via a user defined taxonomy so that Controls can be applied at various levels of classification;
- allows you to retain instances of past Risk Assessments for reporting purposes;
- allows for tracking the results of the Controls applied in the remediation step; and
- is based on an authoritative methodology (e.g. NIST SP 800-30) to meet regulatory compliance objectives.

Expresso® "productizes" the equation and the process that emerges from the NIST methodology as depicted in the graphic below. It is sold as part of the HIPAA Survival Guide's Subscription Plan.




**Identifying Organizational Risks**

## Docs

Release 2.5 also includes DOCS[1], an online access to HIPAA Survival Guide products and a personal Compliance Reporting set of folders. "How To" videos are located on the Expresso page on Customer Hub[2]. User Manuals are

[1] DOCS first became available in Expresso® 2.0.

located in the Expresso Help System. Only Admin users can add or modify documents in the Compliance Repository. Other users may create their own folders. All users can download products from the Products folder.

Documents in the Compliance Repository ("Repository") are limited to approximately 15 Gb without an additional fee. Documents may be dragged and dropped from one Repository to another. Just click on the file and drag it to the desired location. Obviously, documents can be uploaded from a staging area on your network as well. This is where you maintain a *single version of the truth* pursuant to your visible, demonstrable evidence of compliance.

Compliance Repository Menus are shown below.

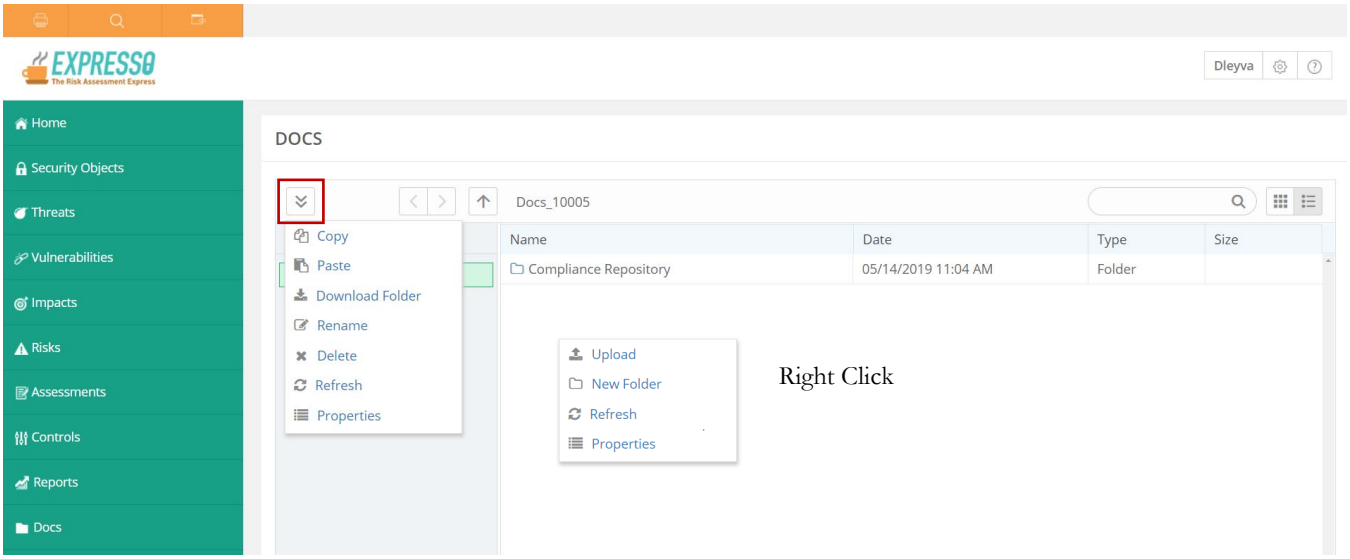



*Figure 1 DOCS Menus*

No additional files can be saved or deleted in the Products folder. Only download is available.
The following graphic illustrates menus for the Products folder.

[2] Customer Hub is where you access all our checklists, training modules, policies & procedures, etc. (i.e. ALL products except for Expresso®).

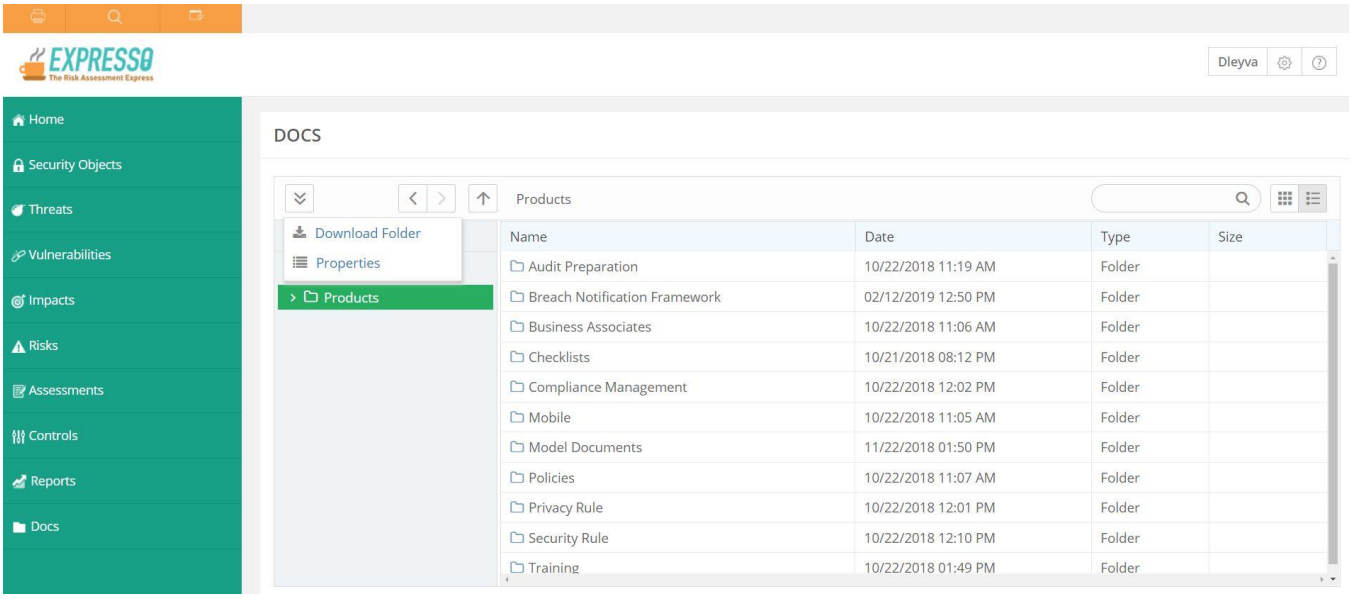



*Figure 2 Access to Products*

# Breach Notification Wizard

The objective of the Wizard is to teach Users how to use our Breach Notification Framework (i.e. how to legally determine whether a Breach has occurred) and to facilitate creating the required documentation in a systematic fashion. It allows you to analyze Incidents that required special attention.

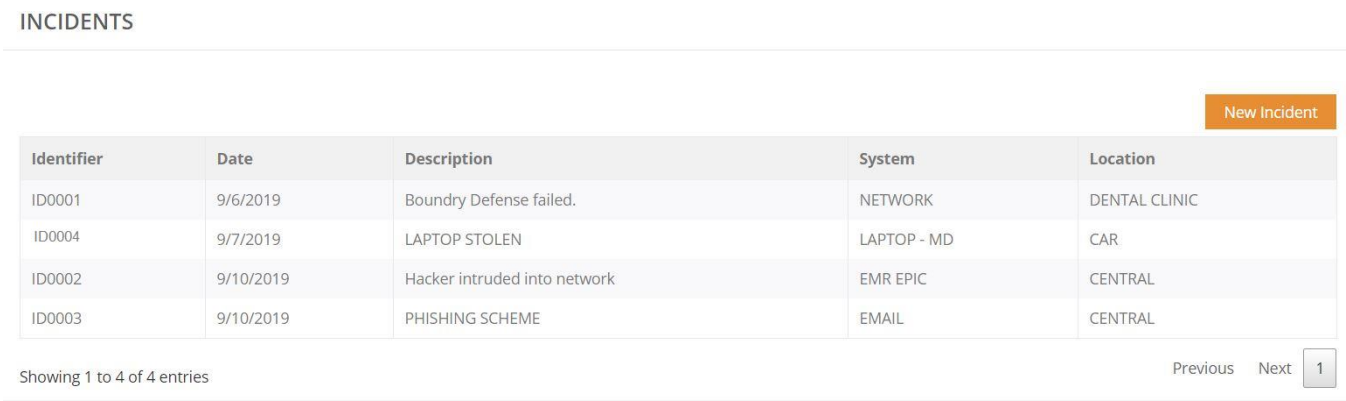
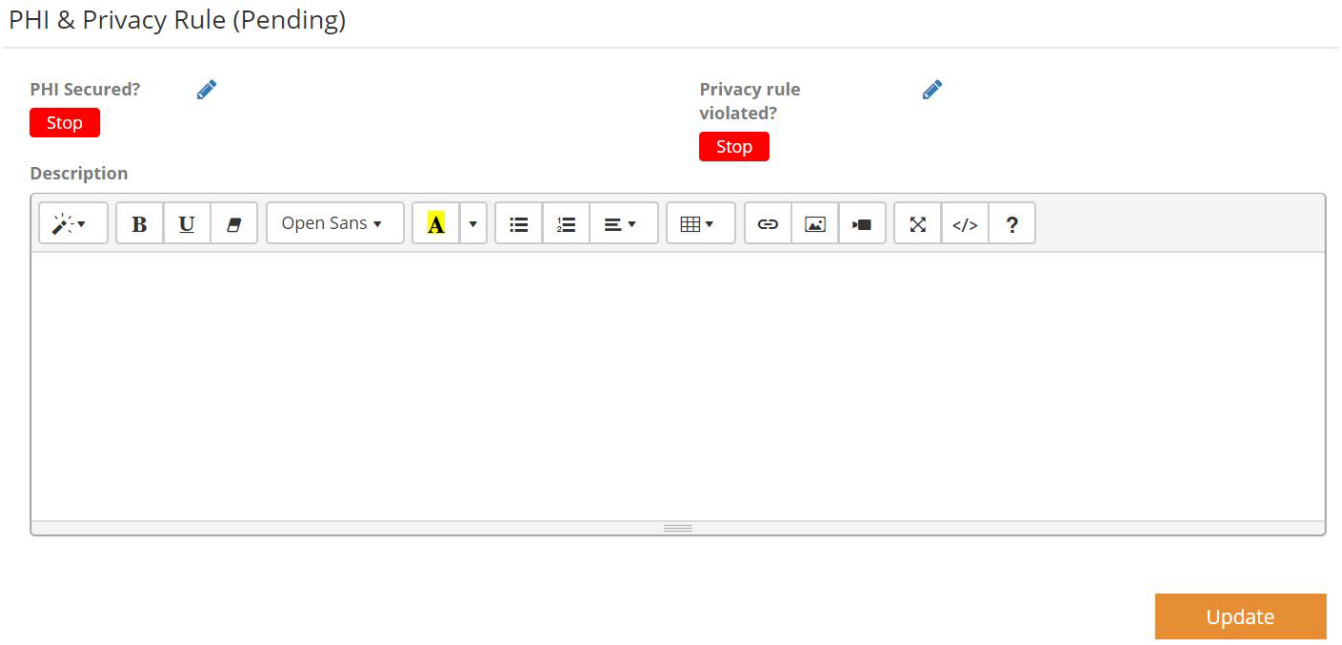



*Figure 39 Incident Home Page*

The Wizard is broken down into a series of Sections each of which is described in detail in Expresso® 2.5's User's guide. Each time the User presses on the "pencil button"  a "wizard" appears that helps the User make a decision that is critical to determining whether Breach Notification is triggered. The current state (i.e. what is selected) of the wizard is saved each time you hit "UPDATE," which implies that the Incident Document is also saved at this time. The reasons for the incremental saves are many-fold but include the following: (1) to document the decision that a User made during this step in the Framework; and (2) to allow the User to complete the Incident Document over time as information will be required from various parts of the Organization.

The ***purpose*** of each wizard is to provide the ability to make decisions regarding associated data that will be documented in the "description control" field of its respective Section. An example of a "wizard screen" follows:




## GDPR

If you purchase our Subscription Plan for HIPAA, you can add a "GDPR Module" that will allow you to perform a Data Protection Impact Assessment for the EU's GDPR. Because the NIST methodology is compliance regime agnostic, Expresso® can support any compliance regime with the appropriate "load file."

## Other Compliance Regimes

As discussed above, future use of Expresso® may support additional compliance regimes as market demands warrant (e.g. PCIDSS, SOX, etc.).

## Benefits

1. Pre-populated (T)hreats, (V)ulnerabilities, (I)mpacts, (R)isks, and (C)ontrols ("TVRCs"): that allows you to perform a Risk Assessment in hours, instead of weeks or months;
2. The ability to capture an unlimited number of Risk Assessments over time in order to show visible, demonstrable evidence of past compliance;

3. The ability to import Security Objects (e.g. people, processes, PCs, servers, networks, applications, databases, physical plant, etc.) from your existing systems thereby minimizing the amount of data entry required;
4. Tracking mechanism(s) for capturing Risk Assessment process results in the form of predefined reports: the measurement;
5. The ability to import (T)hreats and (V)ulnerabilities from authenticated sources: leveraging industry data where available;
6. The ability to directly link to the full source code of Security Rule Controls on the HIPAA Survival Guide website;
7. Scalability, reliability, and availability built-in out-of-the-box using Microsoft's cloud platform Azure; and
8. Much, much more, including a UI that was built for ease of use and clarity that increases your Risk Assessment productivity on day one.
9. The ability to maintain a single version of the truth in your Compliance Repository.
10. The ability to get access to our entire product suite directly from Expresso®.
11. The ability to save hundreds of person hours when analyzing an Incident that your organization has determined requires closer scrutiny because it may trigger Notification.
12. The ability to use Expresso® and a single methodology across compliance regimes.

## Approach & Methodology

Expresso® adopts an agile compliance methodology that allows a customer to eat the Risk Assessment elephant one bite at a time. There is no regulatory requirement that dictates the comprehensiveness of a Risk Assessment each time one is required. In fact, NIST has the following to say pursuant to this topic:

> There are no specific requirements with regard to: (i) the formality, rigor, or level of detail that characterizes any particular risk assessment; (ii) the methodologies, tools, and techniques used to conduct such risk assessments; or (iii) the format and content of assessment results and any associated reporting mechanisms. Organizations have maximum flexibility on how risk assessments are conducted and are encouraged to apply the guidance in this document so that the various needs of organizations can be addressed and the risk assessment activities can be integrated into broader organizational risk management processes.[3]

Therefore, the most important thing you can do with Expresso® is to get started—which means as a practical matter, that you likely won't have all your Security Objects loaded nor every potential threat/vulnerability pair identified. The requirement is that you make a "good faith" effort to perform a Risk Assessment and that you continue to improve on the rigor and quality of your assessments going forward.

[3] *See* NIST SP 800-30 Rev. 1 p. 9.

## Build a Risk Assessment Presence

It's critical that all stakeholders, from the C-Suite to the most recent addition to your Workforce, recognize the importance of performing regular assessments. The threat landscape is changing much too quickly for Risk Assessments to be seen as merely an Information Technology issue. In fact, the consensus is that such a narrow view of Risk Assessments is likely to fail.

## Analyze Results

You can't manage what you don't measure—at least not in a competent and professional manner. A Risk Assessment is an analysis step where you identify Security Controls to be implemented in order to reduce Risks levels to those that are "reasonable and appropriate" for an organization of your size, complexity, etc. It stands to reason that once you have identified the required Controls you must implement them as part of your Risk Management program and subsequently track their effectiveness. Expresso® allows you to update the status of a Risk once the implemented Controls have yielded results.

# Summary

To summarize, Expresso® dramatically reduces the pain associated with performing Risk Assessments and Breach Notification. It provides the internal and external reports necessary to show visible demonstrable evidence of both regulatory compliance and a commitment to protecting unauthorized access to your information.