Auditing EMR System Usage

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However, HIPAA's shortcomings and lack of clarity have fed the public's concern about the potential risks to privacy associated with having the most personal data imaginable stored in electronic format. Add to this, the nearly constant barrage of news stories about health data being accessed by hackers, lost with laptop computers, or simply read by curious employees, and it is little wonder consumers are concerned about privacy.



Search • Browse... | About Us | Contact Us | Privacy Policy | Terms of use | **EMTALA Resources** EMS and Air Medical [In HIPAA / State Privacy Regulations] Jul 15, 2010 **Emergency Preparedness** New HIPAA/HITECH Rules Announced: Drugs / Pharmacy Fraud & Abuse California Hospitals Fined \$675,000 For Privacy Hospital Issues Violations: Jun 11, 2010 Medical Malpractice Medical Records Privacy & What Every Risk Manager Needs To Know About Copy Security Machines: May 8, 2010 CBS exposes the risks to healthcare CMS / OSHA / CDC and other entities for possible data breach violations, financial Product Liability privacy laws violations, HIPAA violations, and makes them Professional Rights vulnerable to being targeted by criminals for theft or other How We Can Help crimes. The video also shows an example of how they can be News and Updates exploited by terrorists. Of course, that is in addition to the MedLaw Links (A-M) risks posed by improper use and distribution of copies MedLaw Links -- (N-S) themselves. View Here. Publisher's Opinions Contact Us Be Prepared To Deal With Exploding Medical ID Theft And About Us Privacy Issues In Healthcare: May 3, 2010 Medical ID Theft is Privacy Policy hitting the headlines as organized crime and ID thieves grab Terms Of Use millions in false claims and leave innocent patients and healthcare providers with the bills. By Stephen A. Frew JD. Hospital Employee Gets Jail Time For HIPAA Violation: Apr 29, 2010 Hospital employee sentenced to rederal prison for 3week long medical records spree. UCLA Employee Indicted For Celebrity Privacy Violations: May 8, 2008 Hospital employee sells celebrity Subscribe now: RSS news medical info to tabloids. feeds provide instant undates without the email

Current HIPAA Security Rules are not enough

\$675,000 for Privacy Violation

Jail Time for Malicious Accesses

HIPAA Security Rules

- Administrative Safeguards
 - Administrative actions, and policies and procedures, to manage the selection, development, implementation, and maintenance of security measures to protect electronic protected health information (PHI)
- Physical Safeguards
 - Physical measures, policies and procedures to protect a covered entity's electronic information systems and related buildings and equipment, from natural and environmental hazards, and unauthorized intrusion
- Technical Safeguards
 - The technology and the policy and procedures for its use that protect electronic protected health information [PHI] and control access to it

Current State



Monitor VIPs (the Clooney effectfinding more attractive man)



Monitor employee-employee access



Follow-up on external suspicion



Spot checks

Technical Safeguards

- Access Control
- Audit controls: Implement systems to record and audit access to protected health information within information systems
 - Track & audit employees access to patient records
 - Store logs for ≥ 6 years

Access Control?

- "We have *-Based Access Control."
- "We have a mathematically rigorous access policy logic!"
- "We can specify {context, team, temporal} policies!"
 (Georgiadis et al, 2001; Park et al. 2001;)
- "We can control your access at a fine-grained level!"
- "Isn't that enough?"

C. Georgiadis, I. Mavridis, G. Pangalos, and R. Thomas. Flexible team-based access control using contexts. *Proceedings of ACM Symposium on Access Control Model and Technology*. 2001: 21-27.

J. Park, R. Sandhu, and G. Ahn. Role-based access control on the web. *ACM Transactions on Information and System Security*. 2001; 4(1): 37-71.

Why is the Problem So Hard?

Hospital system is inherently dynamic

Roles

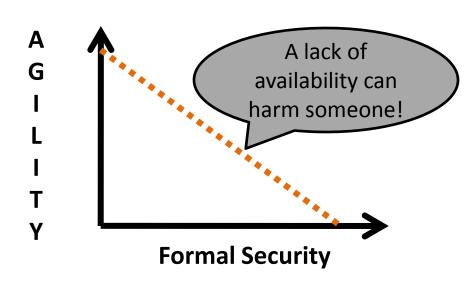
- Multiple responsibilities
- Fuzzy
- Changing

Teams

- Situation dependent
- -Constrained by availability "Can you work today?"

Reason

- Who defines the policies?
- Often Vague
- Cluttered by "multi-use" systems

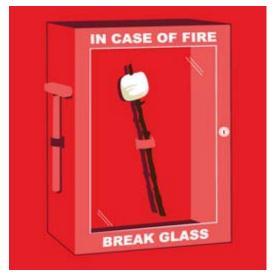


But If You Let Them, They Will Come

- In March 2006, researchers carried out an investigation on hospitals in the Central Norway Health Region
- Users were assigned to an initial set of privileges and could invoke actualization, temporarily escalating their rights as necessary
- Such an access control system is feasible when the number of actualizations is small

This case:

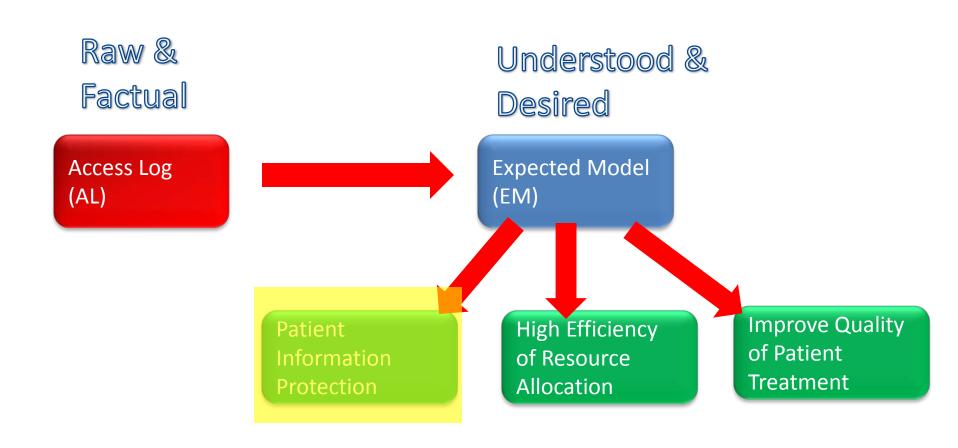
- •53,650 of 99,352 patients actualized
- •5,310 of 12,258 users invoked actualization
- •Over 295,000 actualizations in one month



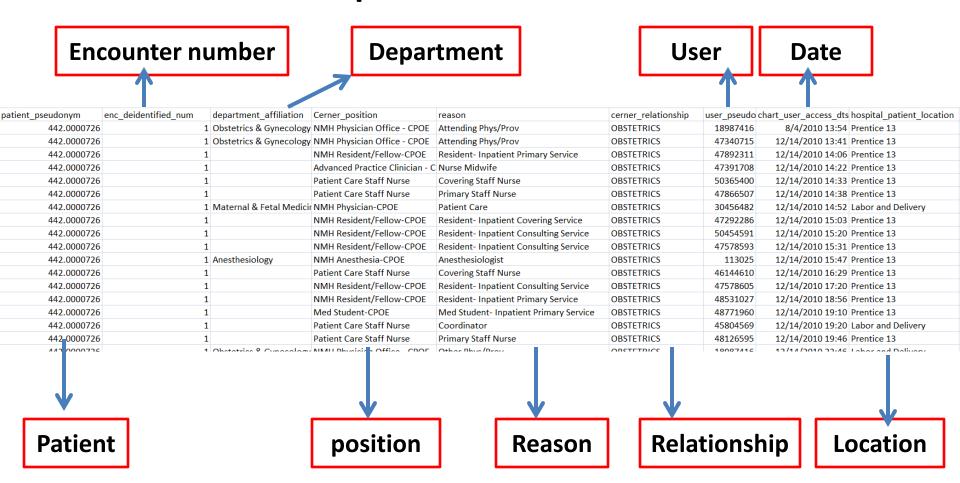
Role	Users	Invoked Actualization in Past Month
Nurse	5633	36%
Doctor	2927	52%
Health Secretary	1876	52%
Physiotherapist	382	56%
Psychologist	194	58%

L. Røstad and N. Øystein. Access control and integration of health care systems: an experience report and future challenges. *Proceedings of the 2nd International Conference on Availability, Reliability and Security (ARES)*. 2007: 871-878.

Aim of Access Logs Auditing



Examples of Accesses



Examples of Patient Diagnose Codes

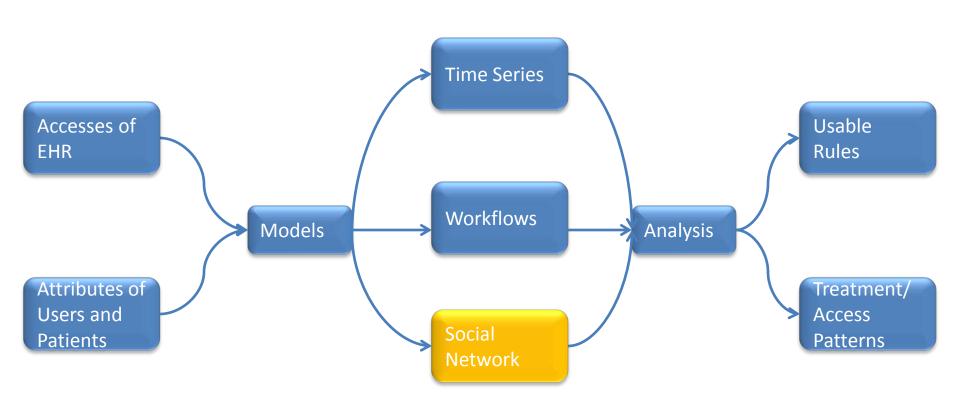
Encounter number

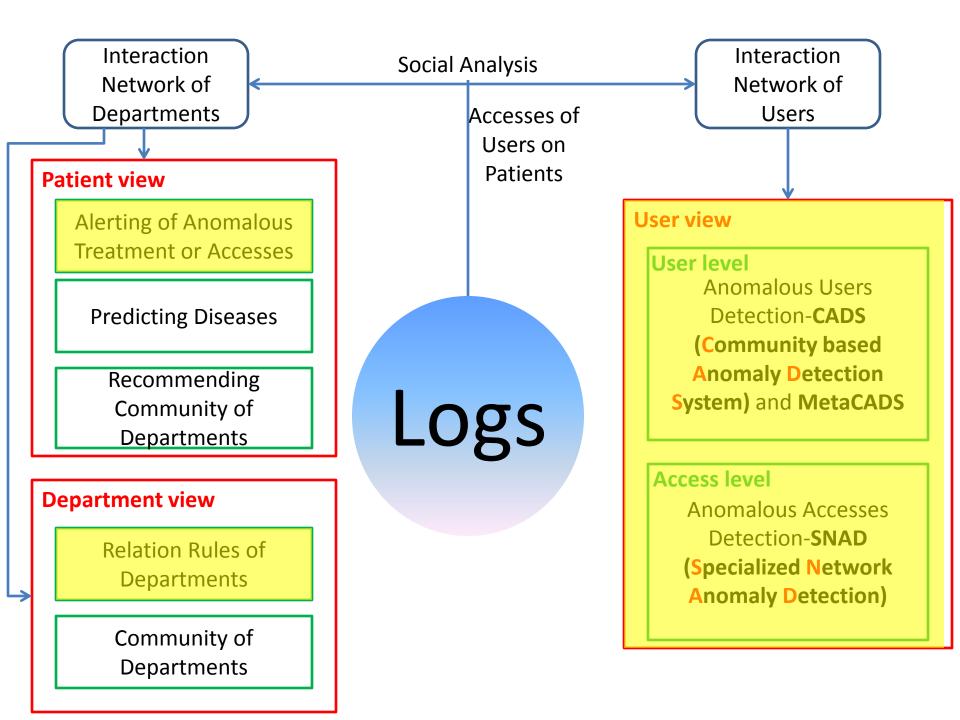
Diagnose codes

patient_study_id	enc_deiden	DX_codes
442.0000726	1	2165 , 65921, 65951, 66401, 66481, V270
442.0001714	1	V053 , V3000
442.0002396	1	4019 , 4111 , 41401, 4142 , 4739 , 49390
442.0002775	2	1122 , 20300, 25000, 27651, 40390, 5845 , 5859 , 591 , 5933 , V1005, V1046
442.0002775	1	1534, 185, 1962, 1974, 20300, 25000, 2809, 40390, 56089, 5849, 5859, 59080, 591, 78791, 7907
442.0003301	1	76408, 76529, V053 , V3100
442.0004873	1	V270 , V8535, 27800, 64911, 64971, 65841, 66401
442.0005024	1	4019 , 72252, V1582
442.0005968	1	5990 , 2724 , 311 , 4019 , 44022
442.0006352	1	65971, V270
442.0007008	1	25000, 6144 , 99859, V1042
442.0007371	1	V707 , 2859 , 33394, 4019 , 71690, 74190, V420
442.0007707	1	30000, 49121, 51889, 60000, 7850
442.0007707	2	78052, V1083, 30001, 496 , 0549 , 1120 , 2768 , 30000
442.0008016	1	V053, V3001
442.0008405	1	2449 , 25080, 4019 , 41400, 42731, 4280 , 60000, V4581, V5861
442 0009617	1	V053 V3000

Patient

Various Ways of Access Logs Auditing

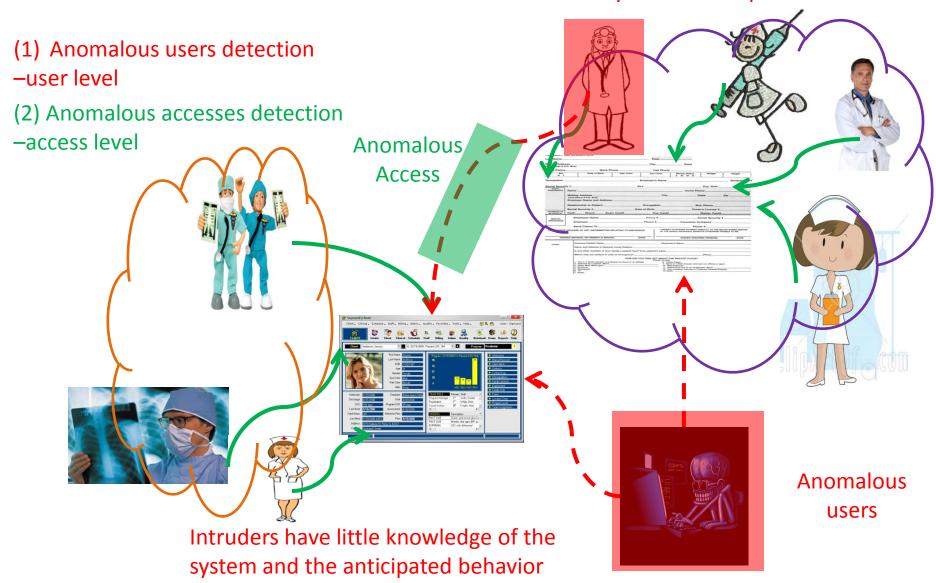




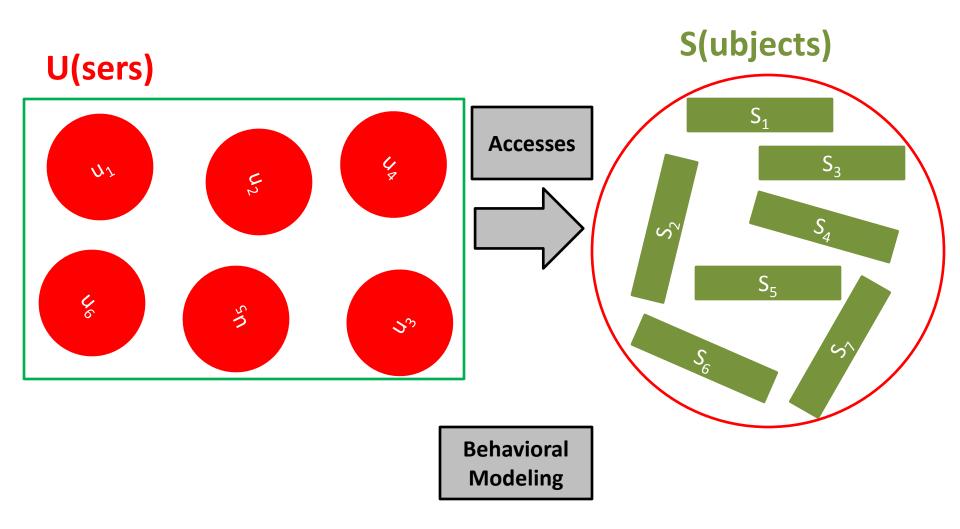
Uncovering Anomalous Usage of Medical Records via Social Network Analysis

Two Typical Attacks

Intruders have complete knowledge of the system and its policies



Two general objects of health information system



Where are We Going?

User Level Anomaly Detection

Community Anomaly Detection System (CADS) and Its Extension MetaCADS

(IEEE TDSC)

Access Level Anomaly Detection

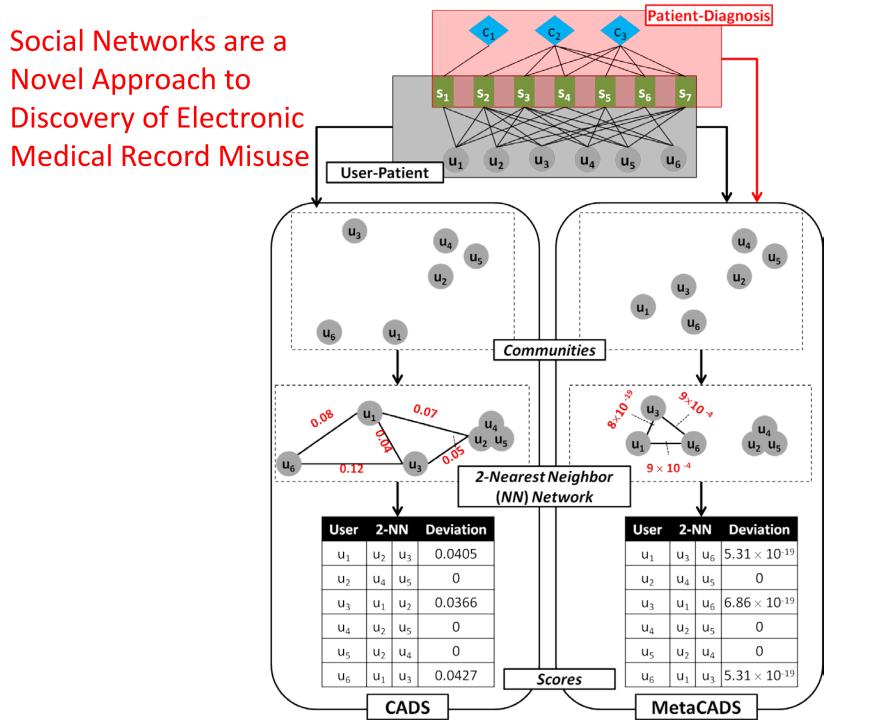
Specialized Network Anomaly Detection (SNAD)

(Security Informatics)

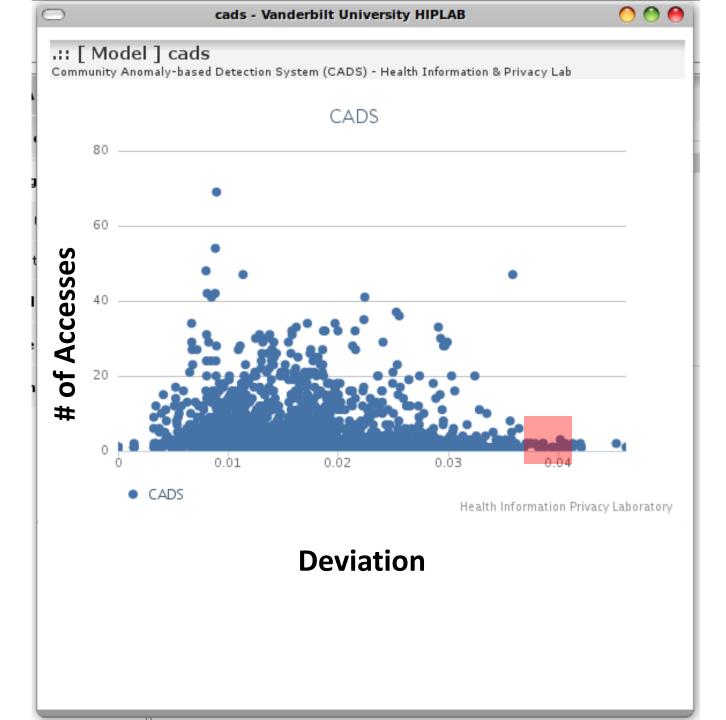
You Chen, Steve Nyemba and Bradley Malin. Detecting Anomalous Insiders in Collaborative Information Systems. IEEE Transaction on Dependable and Secure Computing. Vol.9.No 3, p332-344.

You Chen and Bradley Malin. Detection of Anomalous Insiders in Collaborative Environments via Relational Analysis of Access Logs. Proceedings of ACM Conference on Data and Application Security and Privacy. 2011, p63-74

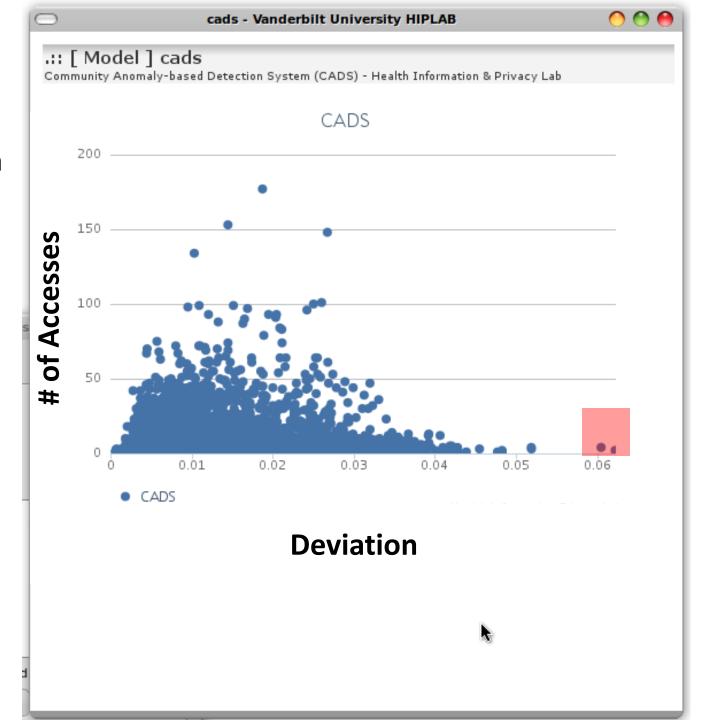
You Chen, Steve Nyemba, Wen Zhang and Bradley Malin. Specializing Network Analysis to Detect Anomalous Insider Actions. Security Informatics. 1:5, 2012, p1-24.



CADS on Vanderbilt Dataset



CADS on Northwestern Dataset



Example Environments

Electronic Health Records (EHR)

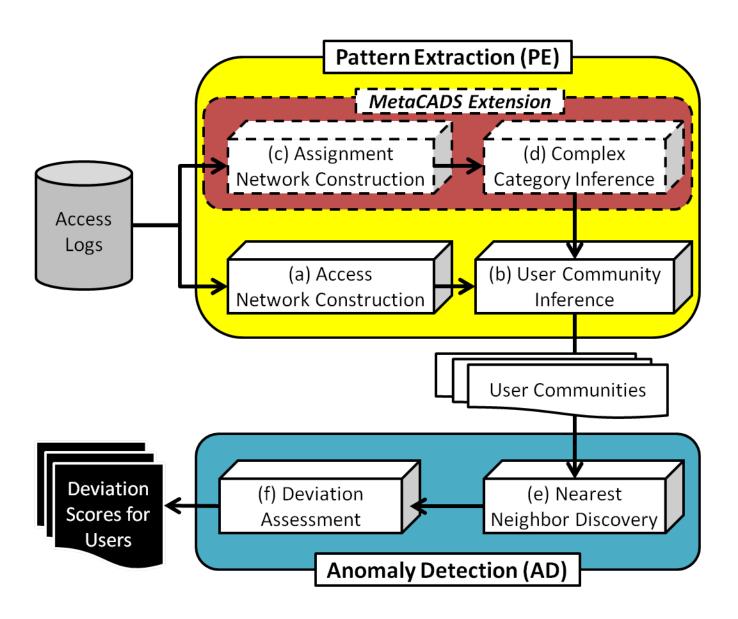
- Vanderbilt University Medical Center "StarPanel" Logs
- 3 months in 2010
- Arbitrary Day
 - ≈ 4,208 users
 - \approx 1,006 patients
 - ≈ 1,482 diagnoses
 - ≈ 22,014 accesses of subjects
 - \approx 4,609 assignments of diagnoses

Where are We Going?

- User Level: CADS and MetaCADS
 - Framework of CADS and MetaCADS
 - An Example of CADS
 - Experimental Evaluation
 - Limitation

 Access Level: Specialized Network Anomaly Detection (SNAD)
 (SI)

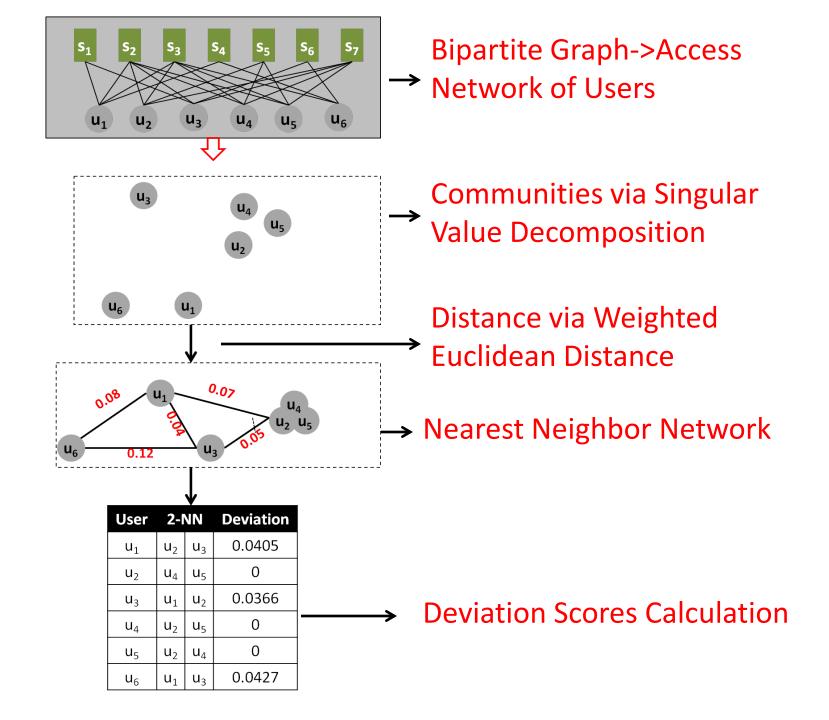
CADS and MetaCADS



Where are We Going?

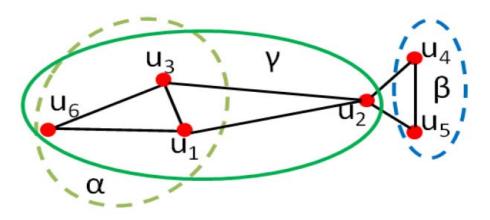
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 (SI)



How Do We Set "k"-NN?

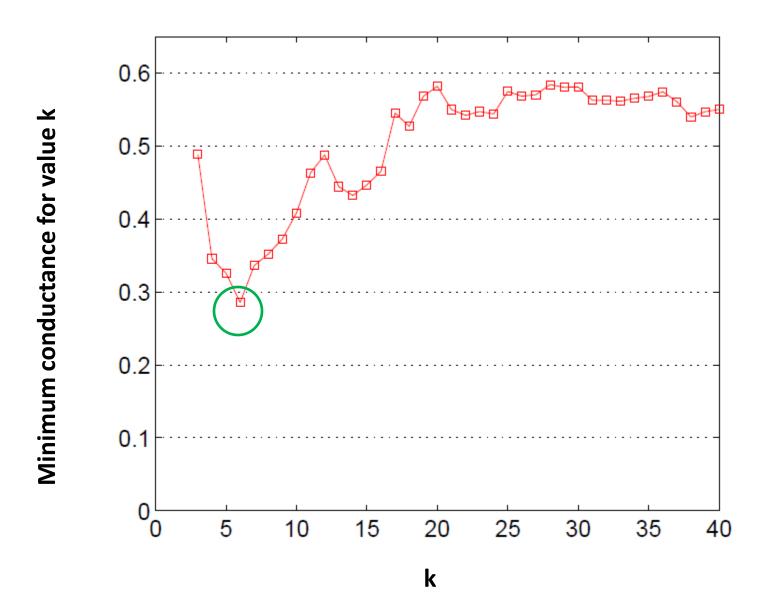
 Conductance- a measure of community quality (Kannan et al)



$$\psi(\beta) = \frac{2}{4}, \psi(\alpha) = \frac{2}{8}, \psi(\gamma) = \frac{2}{\min\{4,12\}}$$

$$\psi(\alpha) < \psi(\beta) = \psi(\gamma)$$

Minimum conductance at k=6



Example 6-Nearest Neighbor Network (1 day of accesses)

The average cluster coefficient for this network is 0.48, which is significantly larger than 0.001 for random networks

Users exhibit collaborative behavior in the health information system



Measuring Deviation from k-NN

- Every user is assigned a radius r:
 - the distance to his kth nearest neighbor
- Smaller the radius
 higher density in user's network

$$Dev(u_i) = \sqrt{\frac{\sum_{u_j \in knni} (r_j - \overline{r})^2}{k}}$$

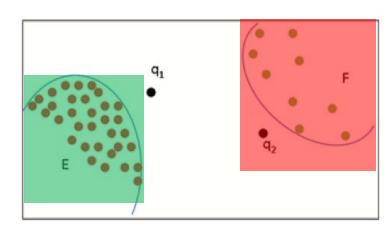
$$\overline{r} = \frac{\sum_{i j \in knni} r_j}{k}$$

Radius for these points are nearly 2, and for q₁ is 3

$$\bar{r} = \frac{2+2+2+2+3}{5} = 2.2$$

$$Dev(q_1) = \sqrt{\frac{(2-2.2)^2 \times 4 + (3-2.2)^2}{5}} = 0.42$$

5 nearest



Radius for these points are larger than 10, and every r values significantly different

If we set threshold of radius as 10, than q_1 is a normal user, who in fact is anomalous

Where are We Going?

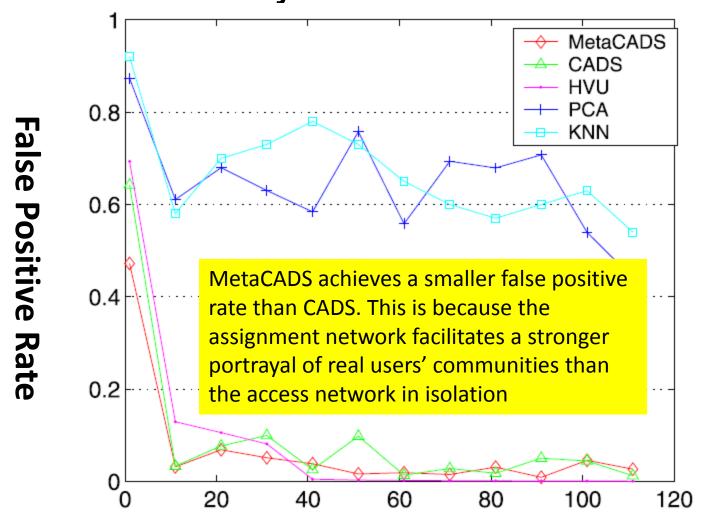
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 Access Level: Specialized Network Anomaly Detection (SNAD)
 (SI)

Experimental Design

- Datasets are not annotated for illicit behavior
- We simulated users in several settings to test:
 - Sensitivity to number of records accessed of a specific users
 - Range from 1 to 120
 - Sensitivity to number of anomalous users
 - simulated users correspond to 0.5% to 5% of total users
 - Number of records accessed fixed to 5
 - Sensitivity to diversity
 - Random number of users(0.5%~5%) and records accessed (1~150)

Exp1: False Positive Rate Decreases, when the Number of Subjects Accessed Increases



Number of patients accessed per user

Exp2: Detection Rate With Various Mix Rates of Real and Simulated Users

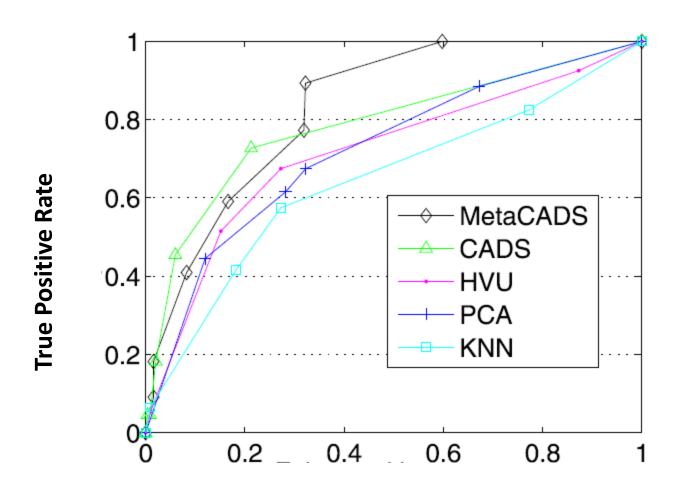
	MIX RATE			
MODEL	0.5%	2%	5%	
MetaCADS	$0.92{\pm}0.02$	0.90 ± 0.01	0.87 ± 0.03	
CADS	0.91 ± 0.01	$0.94{\pm}0.02$	$0.94{\pm}0.01$	
KNN	0.75 ± 0.02	0.73 ± 0.03	0.72 ± 0.04	
PCA	0.72 ± 0.03	0.74 ± 0.02	0.75 ± 0.03	
HVU	0.68 ± 0.03	0.68 ± 0.03	0.68 ± 0.03	

when the number of simulated users is low (i.e., 0.5 percent), MetaCADS yields a slightly higher AUC than CADS (0.92 versus 0.91)

As the number of simulated users increases, CADS clearly dominates MetaCADS. The performance rate of CADS increases from 0.91 to 0.94, while MetaCADS decreases from 0.92 to 0.87.

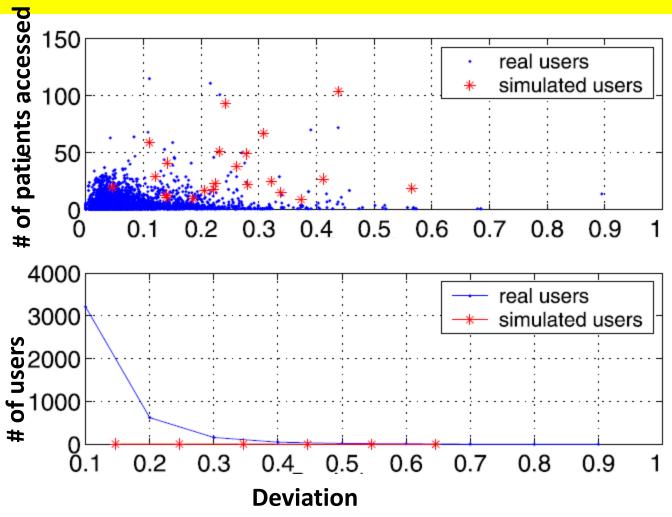
Because when the number of simulated users increases, they have more frequent categories in common. In turn, these categories enable simulated users to form more communities than those based on patients alone, thus lowering their deviation scores.

Exp3: MetaCADS dominates when the mix rate is low (mix rate = 0.5%)



False Positive Rate

MetaCADS deviation scores of real and simulated users as a function of the number of subjects accessed. This system was generated with a mix rate of 0.5 percent and a random number of subjects accessed per simulated user



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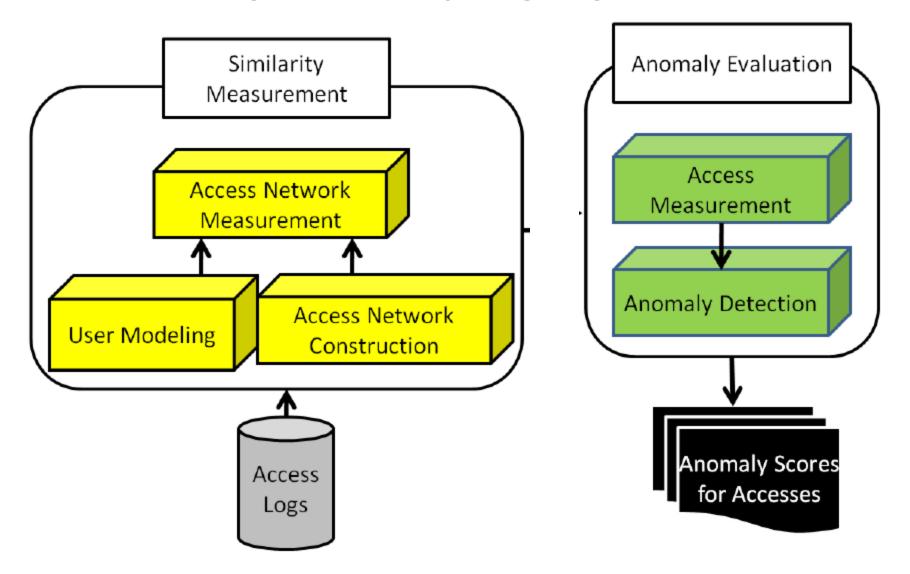
 Access Level: Specialized Network Anomaly Detection (SNAD)
 (SI)

Some Limitations

- Simulated users are indicative of misuse of the system...
 ...but actual illicit behavior may be more directed.
- "False positives" are not necessarily false!
 (Adjudication by EHR privacy experts under way)
- Need to specialize tool to account for semantics of users and subjects
 - User: {Role, Department, Residence}
 - Patient: {Diagnosis, Procedure, Demographics, Residence}
- Anomalous users... not anomalous accesses
 - Need to account for insiders that deviate by only a couple of actions

- User Level: CADS and MetaCADS
- Access Level: Specialized Network Anomaly Detection (SNAD)
 (SI)
 - Framework of SNAD
 - An Example of CADS
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SNAD Framework

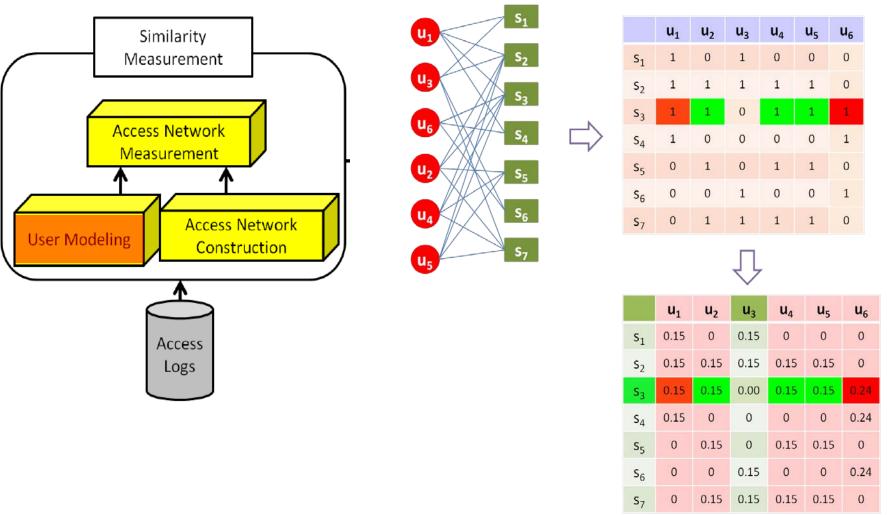


User Level: CADS and MetaCADS

 Access Level: Specialized Network Anomaly Detection (SNAD)
 (SI)

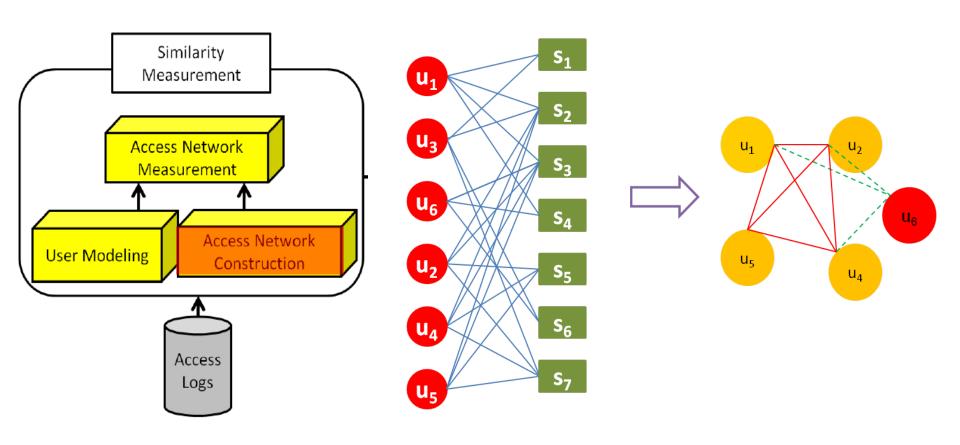
- Framework of SNAD
- An Example of SNAD
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User Modeling

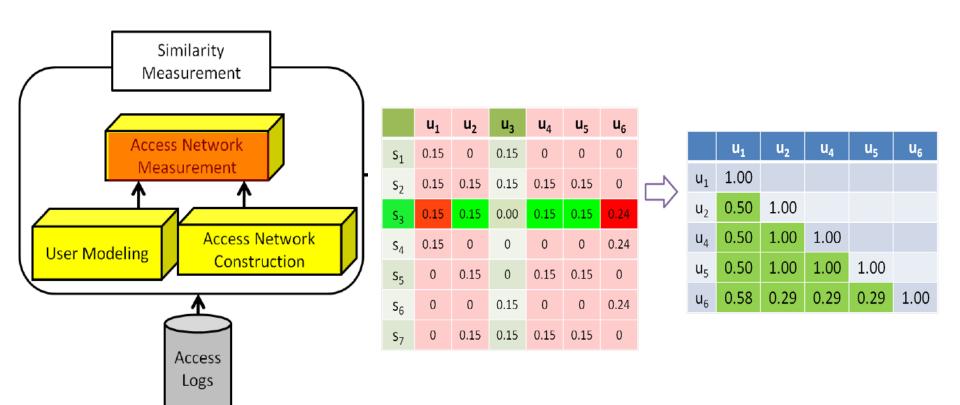


$$IDF(u_i) = log \frac{|S|}{1 + |\{s_j, where SU(j, i) > 0\}|}$$

Access Network Construction

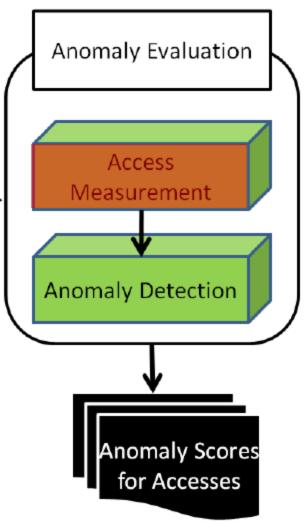


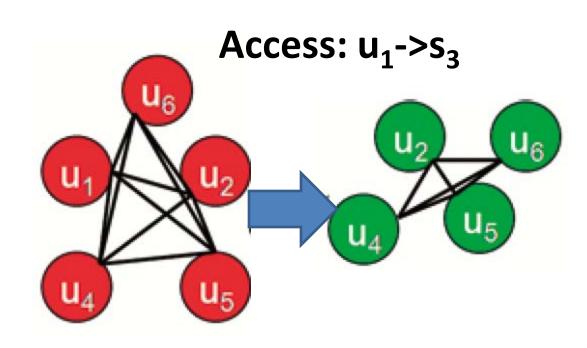
Access Network Measurement



$$Sim(u_i, u_j) = \frac{\mathbf{U_i} \cdot \mathbf{U_j}}{||\mathbf{U_i}|| \times ||\mathbf{U_j}||}$$

Measuring Accesses for Changes in Network Similarity





Network	Similarity	Size
u ₁ ,u ₂ ,u ₄ ,u ₅ ,u ₆	0.59	5
u ₂ ,u ₄ ,u ₅ ,u ₆	0.64	4

	Access	Score	Size
7	u1-s3	0.05	4

CADS and MetaCADS

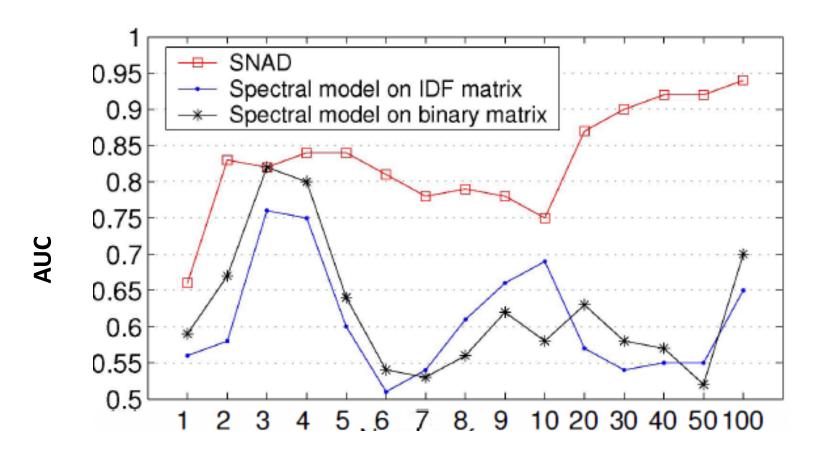
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Experimental Design

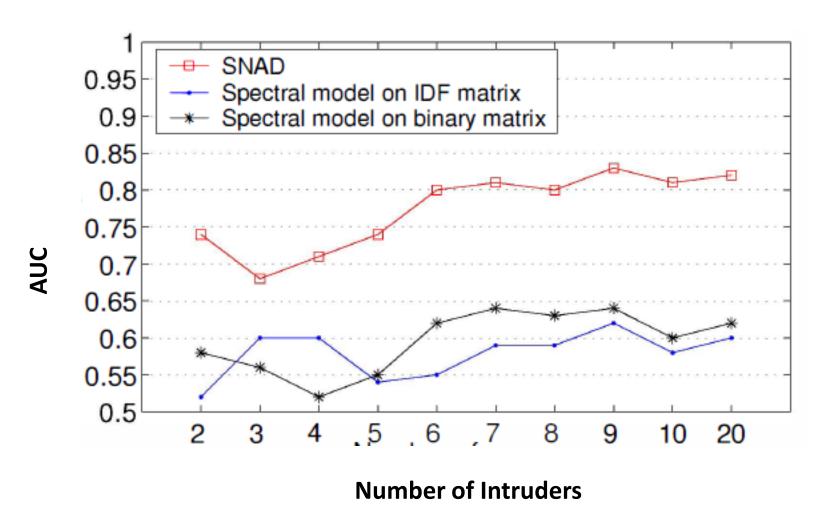
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 - Sensitivity to number of subjects accessed
 - Range from 1 to 1,00
 - Sensitivity to number of anomalous users
 - Range from 2 to 20
 - Number of subjects accessed fixed to 5
 - Sensitivity to diversity
 - Random number of users and subjects accessed

SNAD: Detection Rate Increase with Number of Subjects Accessed

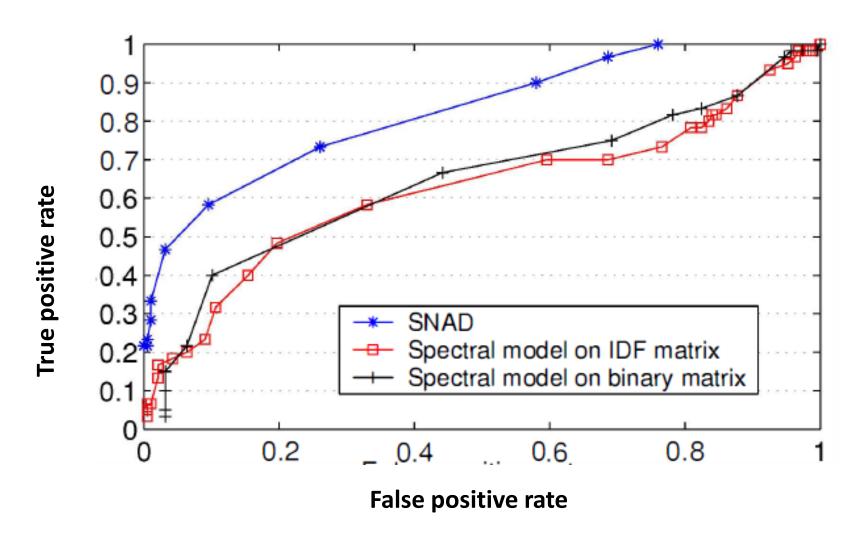


Number of Subjects the Intruder Accesses

SNAD: Detection Rate Increases with Number of Intruders



SNAD Outperforms Competitors When the Number of Intruders & Accessed Subjects is Random



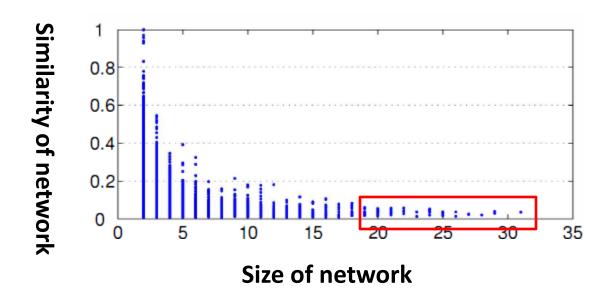
CADS and MetaCADS

 Access Level: Specialized Network Anomaly Detection (SNAD)
 (SI)

- Framework of SNAD
- An Example of SNAD
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Limitations

- SNAD has high performance in Vanderbilt's EHR system because
 - organization is collaborative
 - access networks have high network similarity
- SNAD may not be appropriate for large access network with low network similarity
 - Absence of a user has little influence on the similarity.



Conclusions

- It is an effective way by using social network analysis to detect anomalous usages of electronic health records, such as CADS and SNAD
- Adding semantic information of users and subjects will make social network analysis be more understandable

Protecting Patients through Dynamic Network Analysis of Hospital Department Relationships

Patient information needs to be protected from insiders

- Traditional security practices (e.g., role-based access control) are insufficient to ensure EMR security
 - Common for >100 employees to access a patient's medical record during their visit
 - Often difficult to determine who the members of a care team are and who will need access to what information at which time

EHRs have adopted collaborative capabilities to facilitate interaction between teammates and coordinate care

- We hypothesize that HCO departments will exhibit predictable interaction behavior
- Our goals:
 - 1. Investigate if such behavior exists
 - 2. If so, determine if it is stable
 - If stable interactions become unstable

 associated patients will be anomalous

Our goal is to retrieve the dependent relations of departments and determine whether the dependencies among departments touching that patient are expected?

Expected behavior:

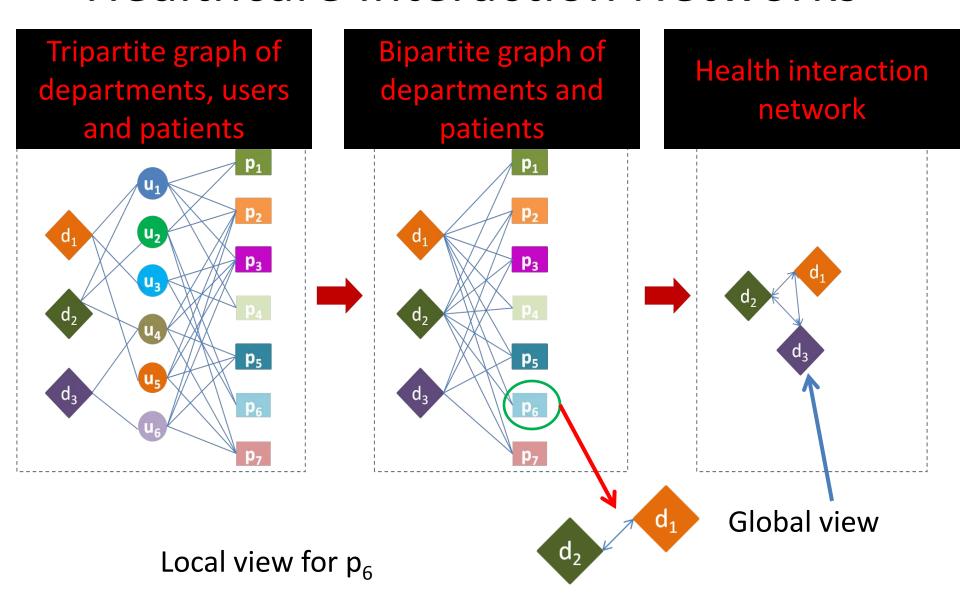
Pediatric housestaff; pediatric cardiology; Vanderbilt Children's hospital

Utilized behavior:

Mental health center; burn center; breast cancer center; pediatric housestaff; pediatric cardiology; Vanderbilt Children's hospital

The dependent relations between green departments and red departments are very low

Healthcare Interaction Networks



A Global Network of Departments

Two metrics: certainty and reciprocity

Stable status in terms of the two metrics

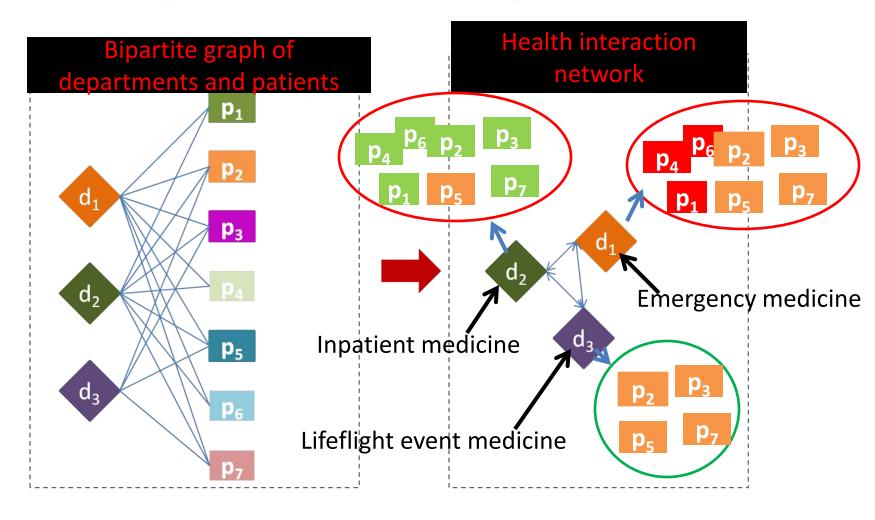
Local Network-for a specific patient

Two metrics: local network score and reciprocity

Application of the Networks

Detecting patients with anomalous medical records accesses

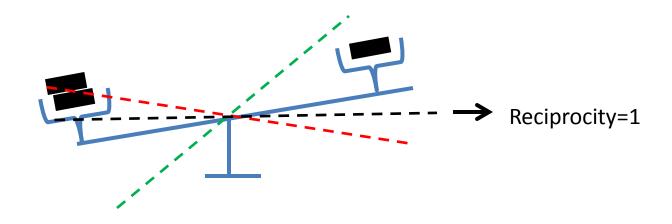
Certainty to Model Relationship of Global Network



Cert(Lifeflight event medicine (d_3) ->Emergency medicine (d_1)) = 4/4

Cert(Inpatient medicine($\frac{d_2}{d_2}$)->Inpatient medicine($\frac{d_2}{d_2}$)) = 6/7

Using reciprocity to characterize the mutual interaction between all pairs of departments in the global network



Pediatric Emergency Dept -> Peds Respiratory Care =0.57

Peds Respiratory Care -> Pediatric Emergency Dept = 0.037

A Global Network of Departments

Two metrics: certainty and reciprocity

Stable status in terms of the two metrics

Local Network-for a specific patient

Two metrics: local network score and reciprocity

Application of the Networks

Detecting Patients with Anomalous Medical Records Accesses

Dataset used for this study

- Vanderbilt University Medical Center "StarPanel"
- 3 months in 2010
- Arbitrary Week
 - \approx 9,200 users
 - ≈ 99,000 patient records
 - \approx 400,000 accesses
 - ≈ 450 departments

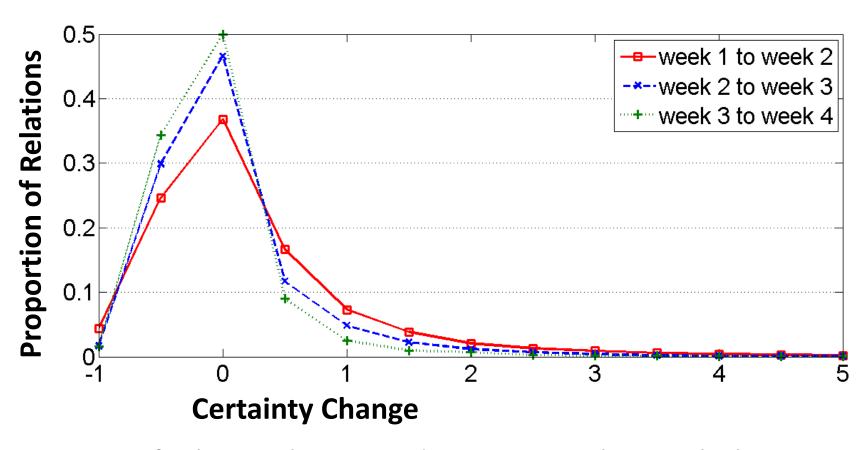
Although the relations of the network are very unbalanced, the unbalance is stable over time

Time	Week 1	Week 2	Week 3	Week 4
Reciprocity	0.267	0.2814	0.2858	0.2871

$$(0.2814 - 0.267) / 0.267 = 0.05$$

Week 1 to week 2

The changes become smaller over time (centralization: green > blue > red)



Degree of relations between departments changes little over time >82.5% of the change resides in [-0.25, 0.25]

Strong relations between VUMC departments over a four week period

Department (d_i)	Department (d_j)	Min Certainty	Max Certainty				
Intradepartmental Relations							
4East OB/GYN	4East OB/GYN	0.74319	0.7669				
Adult Emergency Medicine	Adult Emergency Medicine	0.74024	0.78453				
Cancer Infusion Center	Cancer Infusion Center	0.73171	0.844				
8N Inpatient Medicine	8N Inpatient Medicine	0.7197	0.80909				
Newborn Nursery	Newborn Nursery	0.70406	0.72727				
Interdepartmental Relations							
DOT Radiology	Orthopaedics	0.99621	1				
Nursing Education and Development	Medical Information Services	0.95833	1				
Main OR - Trauma/Renal	Medical Information Services	0.94444	1				
Life Flight Event Medicine	Emergency Medicine	0.90805	1				
Emergency Medicine Admin	Adult Emergency Medicine	0.91489	0.94186				

A Global Network of Departments

Two metrics: certainty and reciprocity

Stable status in terms of the two metrics

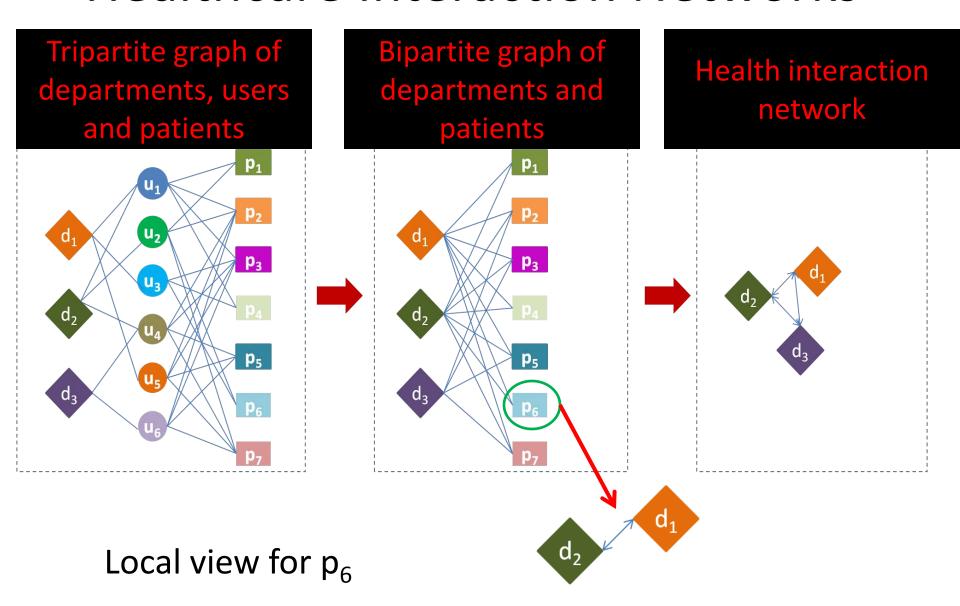
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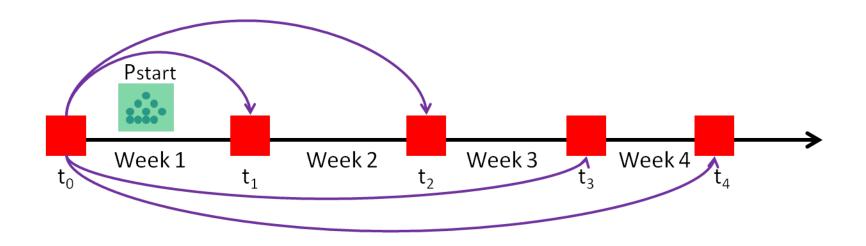
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Healthcare Interaction Networks

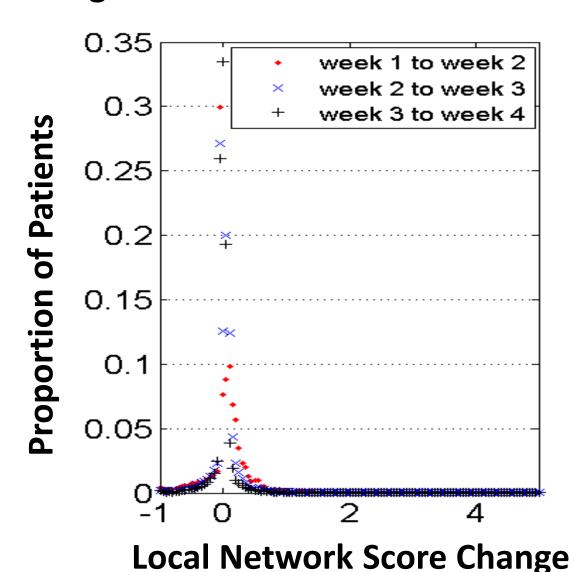


Evolution of Local Networks in Terms of Local Network Score and Local Network Reciprocity

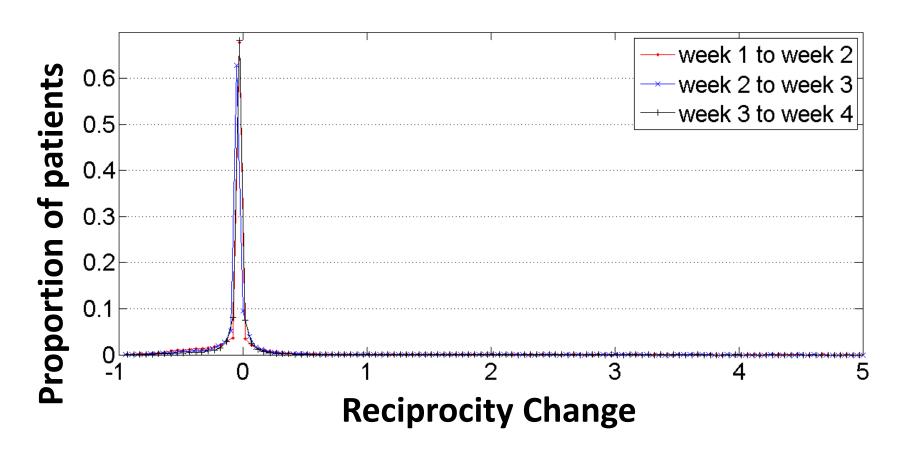


Each point in P_{start} corresponds to a local network

Over 98% of patients are normal because they exhibit a score change < 0.05



Approximately 99% of patients are normal because they have a change of reciprocity <0.1



A Global Network of Departments

Two metrics: certainty and reciprocity

Stable status in terms of the two metrics

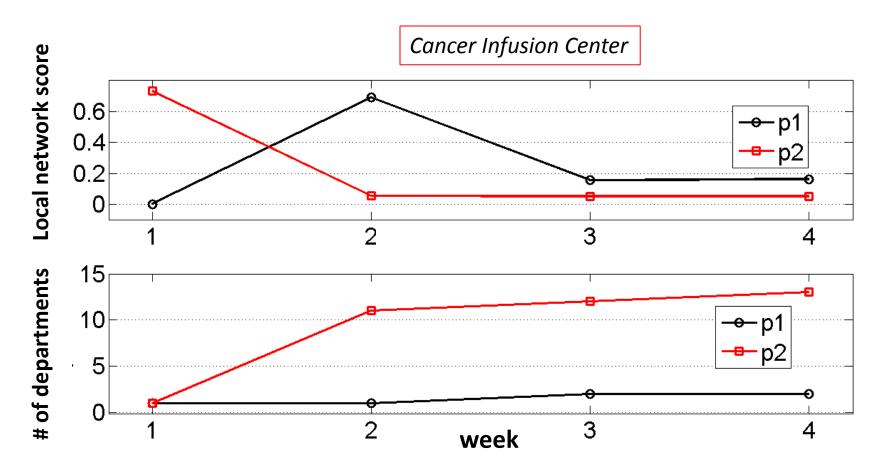
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Two metrics: local network score and reciprocity

Application of the Networks

Detecting patients with anomalous medical records accesses

p2 has -0.93 change of local network score and -0.79 change of local reciprocity from the 1st to the 2nd week



Breast Center, [Anonymized Street Location], Care/Eskind Diab Acces, Disease Management Service, Eskind Diabetes - Adult, Free Stipends, Internal Medicine, VIM, VMG Physician Billing Services, Vanderbilt Home Care Primary

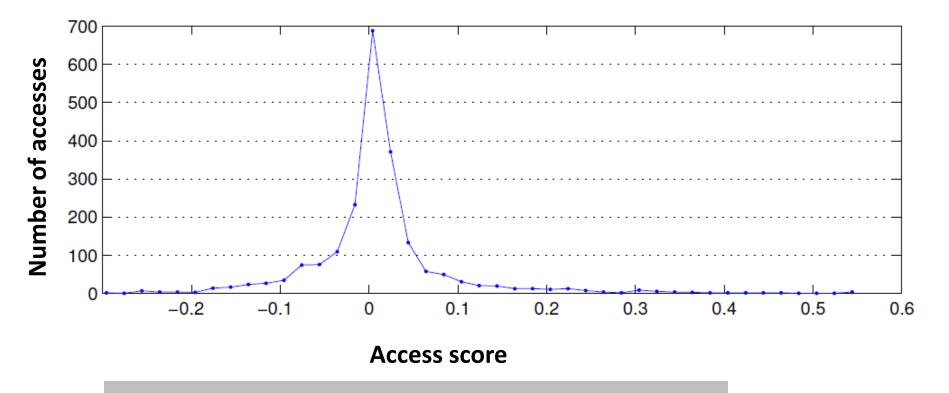
Conclusions

- We hypothesized an HCO would exhibit strong stability
 - confirmed by our experiments
- We can characterize how strange a patient's local network appears
 - Two groups of patients; those with small changes in local network score and reciprocity score and those with significant changes
 - The changes in the latter group do not justify the claim that the patient has been intruded upon, but may provide a reason for an investigation that incorporates more nuanced domain knowledge

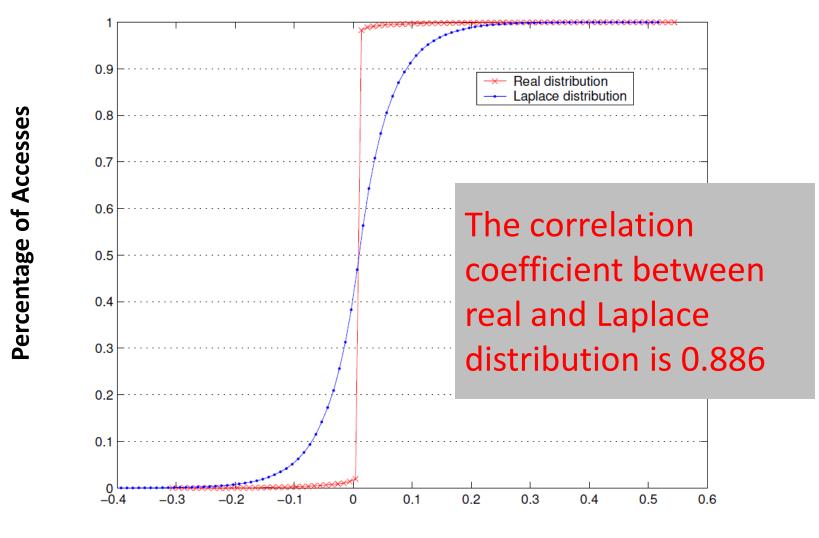
Some Limitations

- Global and local networks appear to represent the business processes of HCO departments
 - however, such claims must be confirmed with employees knowledge about the working of the medical center and its affiliated clinics
- Need to specialize tool to account for semantics of patients
 - Patient: {Diagnosis, Procedure, Demographics, Residence, physical location in a hospital}
 - Incorporating semantics about the patient, p₂ in the last figure may have no intrusion; rather it is likely a complex cancer patient, which could be confirmed by inspection of clinical documents in the medical record

Thanks!



SNAD assumes that access scores are approximately distributed around a well-centered mean.



Access score