

* * * To be completed by the Vendor representative * * *

Important Instructions

- <u>All questions</u> in this assessment are mandatory. Answer all questions to the best of your knowledge and ability. Incomplete or inaccurate assessment forms will not be reviewed and may result in processing delays, an unfavorable rating, and/or the exclusion of the vendor solution from Providence's environment or use with Providence data.
- The vendor representative who is completing this form must have sufficient knowledge of the system or service to accurately and completely represent their product.
- Not all <u>sections</u> will apply. If a section is not mandatory and does not apply, mark the checkbox indicating that the section does not apply, and proceed to the next section as instructed in the form.
- All 'N/A' and 'No' responses require an explanation in the corresponding Vendor Comments field. 'N/A' and
 'No' responses that do not have a corresponding rationale in the comments field will not be accepted and may
 result in a finding.
- Comments are encouraged for 'Yes' answers as well, because this information can help provide additional context to the reviewer. If your organization has strong security controls, please use the Vendor Comments section to highlight those controls even for 'Yes' answers. However, additional comments corresponding to 'Yes' answers are not required unless otherwise specified.
- <u>NOTE:</u> Some fields require an entry into the corresponding *Vendor Comments* field regardless of the answer. Questions of this nature usually have a secondary question or information request in a parenthetical statement below the primary question.
- <u>DO NOT</u> alter the content of this document. Provide your answers only in the space allocated to do so. Any unauthorized document changes that are detected may result in processing delays, an unfavorable rating, and/or the exclusion of the Vendor's solution from Providence's environment or use with Providence data.
- <u>DO NOT</u> convert this questionnaire to a PDF or other document format because Providence security analysts will use this form to complete their assessment and file the results.
- For systems or services that store, process, or transmit Payment Card Information (PCI), transactions or storage involving credit or debit card information, please return the documents requested below along with this completed form.



Security Review Status Definitions

Satisfactory — Vendor responses to the Vendor Security Assessment (VSA) questionnaire demonstrated that the system or service exhibited no material findings and is capable of meeting Providence requirements (i.e., policies, standards, regulatory requirements, contractual and legal obligations, and relevant federal, state, and local laws). While the Vendor system or service has been determined to be capable of meeting Providence requirements, stakeholders are nonetheless responsible to ensure that the system or service is configured, deployed, and operationalized in accordance with such requirements. Default or Vendor-recommended configurations, deployment methods, and operating practices may not be consistent with Providence requirements. Questions about whether a configuration, deployment method, or operating practice is in accordance with Providence requirements can be directed to the analyst who conducted the VSA or to the Information Security Risk Advisory general mailbox: InfoSecRiskAdvisory@providence.org. In addition to the VSA, further EIS follow-up reviews (e.g., Security Engineering and Security Architecture reviews, etc.) may be required prior to deployment, depending on the criticality, complexity, and risks associated with the system or service. Systems and services that were assigned a Satisfactory rating generally represent Very Low or Low risk to Providence, if configured, deployed, and operated in accordance with Providence requirements.

Satisfactory with Conditions - Vendor responses to the Vendor Security Assessment (VSA) questionnaire demonstrated that the system or service exhibited material findings and was partially incapable of meeting Providence security requirements (i.e., policies, standards, regulatory requirements, contractual and legal obligations, and relevant federal, state, and local laws). Use of the system or service could adversely impact the confidentiality, integrity, and availability of Providence systems or data. Enterprise Information Security (EIS) will communicate specific VSA findings and their associated risks to the Providence business, technology, or data owner. If the business, technology, or data owner chooses to proceed with the deployment or use of the Vendor's system or service, despite his or her awareness of the findings and associated risks, he or she is fully responsible for the risks and the adverse impact that such risks could have on Providence. Likewise, the business or data owner is responsible for working directly with the Vendor to remediate the security control gaps that have generated the risks. In some cases (to be determined by EIS on a case-by-case basis), EIS may require the business, technology, or data owner to formally accept the risks, and the risks will be tracked in the Providence Risk Register system until they are adequately mitigated. Members of EIS will, in most circumstances, be available to provide guidance and security risk consultation as the business, technology, or data owner works to remediate the findings and associated risks. In most cases, business, technology, or data owners, or their designees, should work with the analyst who conducted the VSA. However, they can also direct inquires to the Information Security Risk Advisory general mailbox: InfoSecRiskAdvisory@providence.org. Systems and services that were assigned a Satisfactory with Conditions rating generally represent a Moderate risk to Providence, if configured, deployed, and operated in a manner that is consistent, to the extent that they are capable, with Providence requirements.

Fail – Vendor responses to the Vendor Security Assessment (VSA) questionnaire demonstrated that the system or service exhibited significant security gaps and/or regulatory non-compliance. A clear and timely path to risk mitigation is not currently possible. Use of this application or service represents a significant



risk to Providence systems, data, and possibly patient safety. The system or service is <u>not</u> approved for Providence use. Systems or services that were assigned a Fail rating represent a High or Very High risk to Providence.

Acronyms and Terms:

AD: Active Directory

AES: Advance Encryption Standard

BAA: Business Associate Agreement

EIS: Enterprise Information Security (Providence's Information Security department)

laaS: Infrastructure as a Service

LDAP: Lightweight Directory Access Protocol

LEEF: Log Event Extended Format

OS: Operating System

PCI: Payment Card Industry (See expanded definition under Confidential Data Types below)

PHI: Protected Health Information (See expanded definition under Confidential Data Types below)

PII: Personally Identifiable Information (See expanded definition under Confidential Data Types below)

Providence: Providence Saint Joseph Health

PaaS: Platform as a Service

SaaS: Software as a Service



SIEM: Security Information and Event Management

SSAE 16 or 18 SOC II: Statement on Standards for Attestation Engagements (report on compliance controls)

SSL: Secure Socket Layer

SSO: Single Sign-On

Subcontractor: Any individual, corporation, partnership, joint venture, limited liability company, or other such entity that is, at any time during the term of an agreement with Providence, performing work on behalf of the Primary Vendor (meaning the company or organization completing this assessment questionnaire.)

Vendor or Primary Vendor: For the purposes of this assessment, a Vendor is a HIPAA Business Associate, HIPAA Covered Entity, technology or services vendor, or any other non-Providence business partner performing a technical or business function, either through a contract or other formal agreement, for Providence. The term Vendor does not include software resellers or consultants implementing a solution.

VPN: Virtual Private Network

Confidential Data Types Defined:

<u>Personally Identifiable Information (PII)</u>: PII is any piece of information that could potentially be used to identify, contact, or locate an individual. This includes, but is not limited to:

- Social Security Number
- Driver's license or state identification card number
- Date of birth
- Financial information, such as credit or debit card numbers
- Password or PIN number
- Address information, such as street address or email address
- Telephone numbers, including mobile, business, and personal numbers

<u>Protected Health Information (PHI) / electronic Personal Health Information (ePHI)</u>: Any information, including demographic information, that is created or received by a HIPAA Covered Entity (e.g., healthcare institution, health insurance provider) or a Business Associate (e.g., a vendor or service provider used by a Covered Entity) and relates to:

- the past, present, or future physical or mental health or condition of an individual;
- the provision of health care to an individual;
- the past, present, or future payment for the provision of health care to an individual; and that identifies the individual or for which there is a reasonable basis to believe the information can be used to identify the individual. PHI includes information concerning persons living or deceased (less than 50 years) and may be written, oral or electronic.



There are 18 identifiers that constitute PHI.

- 1. Names
- 2. All geographic subdivisions smaller than a state, including: street address, city, county, precinct, ZIP Code, and their equivalent geographical codes, except for the initial 3 digits of a ZIP Code if, according to the current publicly available data from the Bureau of the Census: (1) The geographic unit formed by combining all zip codes with the same three initial digits contains more than 20,000 people; and (2) The initial three digits of a zip code for all such geographic unites containing 20,000 or fewer people is changed to 000.
- 3. All elements of dates (except year) for dates directly related to an individual, including birth date, admission date, discharge date, date of death; and all ages over 89 and all elements of dates (including year) indicative of such age, except that such ages and elements may be aggregated into a single category of age 90 or older.
- 4. Telephone numbers
- 5. Fax numbers
- 6. E-mail addresses
- 7. Social Security numbers
- 8. Medical record numbers
- 9. Health plan beneficiary numbers
- 10. Account numbers
- 11. Certificate/License numbers
- 12. Vehicle Identifiers and serial numbers (including license plates)
- 13. Device identifiers and serial numbers
- 14. URL addresses
- 15. IP addresses
- 16. Biometric identifiers, including fingerprints and voiceprints
- 17. Full face photos and any comparable images
- 18. Any other unique identifying number, characteristic or code

<u>Confidential Information (Business Confidential Information or Intellectual Property)</u>: Any information, regardless of format, about patients, workforce members, or business operations that:

- an organization is legally required to keep confidential;
- an organization deems should not be available without specific authorization; or
- a workforce member should reasonably understand to be proprietary to an organization or otherwise should be maintained confidentially.

Loss or inappropriate access to Confidential Information may cause harm to the privacy of patients or harm to an organization's ability to conduct business. Confidential information includes but is not limited to PHI, ePHI, PII including SSNs, payment card holder data (PCI), financial information, intellectual property, and research data. Other examples of confidential information include but are not limited to chemical dependency or mental health information, employee/personnel records, privileged information from internal/external counsel, board, board committee (at any level of the organization) or medical staff committee minutes, notes or actions, non-public financial, strategic or operational information, trade-secrets or other confidential information or





processes used by an organization in carrying out its activities, and information which an organization or one of its business lines has agreed to keep confidential.
Payment Card Industry (PCI): The PCI Standards Council is a consortium of card brands (e.g., Visa, MasterCard, and Amex) and sponsoring companies that establish standards for card-processing functions. PCI information is any cardholder data elements which, at a minimum, includes data that comprises the full Primary Account Number (PAN), credit or debit card number. Cardholder data may also appear in the form of the full PAN plus any of the following: cardholder name, expiration date, and/or service code.



* * * Start Questionnaire * * *

Vendor Contact Information [Required – Do not skip]

Date: 10/14/2022	Vendor Company Name: Elekta, Inc.
Vendor Contact Name: Jacob Mondalek	Product or Service Name(s): Versa HD
Vendor Contact Title: Product Delivery Manager	Vendor Website: www.elekta.com
Vendor Contact Email: Jacob.mondalek@elekta.com	Vendor Support Phone Number: Click here to enter text.
Vendor Contact Phone Number: 770-670-2329	Name of Primary Providence Stakeholder: Click here to enter text.
Vendor Security Contact Information	
Security Contact Name: Ramakrishnan Pillai	Security Contact Phone Number: +1 (408) 830-8024
Security Contact Title: Digital Product Security Officer	Security Contact Email: ramakrishnan.pillai@elekta.com



General Information [Required – Do not skip]

Complete all fields below. If you are uncertain about how to answer a question, please contact the assigned security analyst or the Providence point of contact.

Provide a brief summary of the Vendor system or service functionality. Note: Please either avoid acronyms or expand acronyms, and please explain the functionality in such a way that it can be understood by someone who may not have a specific background or training on a business process, treatment methodology, technology, etc.	The Elekta Medical Linear Accelerator (EMLA) is intended to be used for external beam radiation therapy (EBRT) treatments as determined by a licensed medical practitioner. It is intended to assist a licensed medical practitioner in the delivery of EBRT to defined target volumes, while sparing surrounding normal tissue and critical organs from excess radiation. It is intended to be used for single or multiple fractions using standard fractionation, hyperfractionation, hypofractionation and stereotactic delivery (stereotactic body radiation therapy – SBRT; stereotactic ablative radiotherapy – SABR; stereotactic radio surgery - SRS) in all areas of the body where such treatment is indicated and for the treatment of functional disorders, such as trigeminal neuralgia.		
What is the nature of the data to be stored, processed, or transmitted by the Vendor system or service? Select all that apply.	□ Confidential information (business sensitive data, intellectual property) □ Personally Identifiable Information (PII) □ Protected Health Information (PHI)/Patient Data* □ Payment Card Information (PCI) / Cardholder Data □ Other Data, specify: Click here to enter text. *If PHI was checked above, will the Vendor sign (or has the Vendor signed) a Business Associates Agreement (BAA) with Providence in compliance with the		
Is all or part of the Vendor solution considered a Medical	Healthcare Information Accountability and Portability Act (HIPAA)? ☐ Yes ☐ No ☐ Yes* ☐ No		
Device as defined by the United States Food and Drug Administration (FDA)?	*If the answer to this questions was Yes, please provide the following: ☑ FDA Certification #: Click here to enter text. ☑ Attach the corresponding MDS2 and return it along with this form or document why an MDS2 has not been completed.		
Where will Providence data reside, both logically and physically? Select all that apply.	 ✓ Providence Hosted Server and/or System ☐ Vendor Data Center ☐ A Cloud Provider Service (SaaS, PaaS, IaaS) or hosted service ☐ Other, specify: On-Premise solution supplied with Versa HD by Elekta 		



In which geographies will Providence data be stored, processed, transmitted, or accessed?	 ✓ Within the legal borders of the United States ☐ Outside the legal borders of the United States ("offshore") Please list the corresponding locations outside the US: Click here to enter text.
Which of the following technologies can be used with the Vendor system or service? Select all that apply.	
Will this system or service appropriately function without the use of Internet Explorer?	☐ Yes ☐ No ☑ N/A – System or service does not use a web browser
Will this system or service fully function when using the Microsoft Chromium Edge browser?	☐ Yes ☐ No ☑ N/A – System or service does not use a web browser
Who will support this system or service (e.g., patching, upgrading software, and/or workstation or device security)? Select all that apply?	 ✓ Vendor ☐ Providence ☐ Providence & Vendor hybrid ☐ Other, specify: Click here to enter text.



Payment Card Industry (PCI)

Will the system or service store, process, or transmit Payment Card Industry (PCI) / Cardholder Data (e.g., credit or debit card information)?

 \square Yes – Answer the questions below <u>and</u> supply the information and documents requested below to Providence when returning this form.

☑ No – Skip this section and proceed to the next section

PCI – Complete all fields below. If you are uncertain about how to answer a question, please contact the assigned security analyst or the Providence point of contact.

#	Question	Response	Vendor Comments / Written Response	Providence Comments
PCI 0.1	Will the Vendor solution incorporate any components that will be installed on a Providence network or Providence-managed cloud subscription (e.g., Azure, AWS, GCP)?	□ Yes □ No		
PCI 0.2	For solutions that involve physical payment devices, are the devices owned by?	☐ Providence ☐ Vendor ☐ Other	If "Other", please specify below:	
PCI 0.3	For solutions that involve physical payment devices, are the devices ordered and maintained by?	☐ Providence ☐ Vendor ☐ Other	If "Other", please specify below and include contact information needed for ordering and/or maintaining the device:	
PCI 0.4	For solutions that involve physical payment devices, please provide the following:		Device Model: Click here to enter text. Manufacturer: Click here to enter text.	



#	Question	Response	Vendor Comments / Written Response	Providence Comments
			Software name and version: Click here to enter text.	
PCI 0.5	What payment processor or gateway will be used?			
PCI 0.6	Please provide all of the following supporting documentation and return it to Information Security along with this form:			
	☐ Attestation of PCI compliance from the vendor.			
	☐ Diagram of how credit card data flows from Providence to the Vendor's system.			
	☐ As applicable, verification that the Vendor is hosting the website and payment page, the entire credit card process (to include encryption during transit), and the storage and security of credit card information.			

1. Administrative, Policy, and Procedure: DO NOT SKIP

#	Question	Response	Vendor Comments	Providence Comments
1.1	Does the Vendor have and proactively maintain a current HIPAA-compliant Privacy policy that clearly documents requirements for identifying, classifying and maintaining the confidentiality of Protected Health Information (PHI)?	⊠ Yes □ No □ N/A		
	(IMPORTANT: If the Vendor will not store, process, transmit, or otherwise access PHI, as defined by HIPAA, please respond with an 'N/A'. Also, include a comment noting that the			



#	Question	Response	Vendor Comments	Providence Comments
	Vendor will not store, process, transmit or otherwise access Providence PHI.)			
1.2	Does the Vendor have and proactively maintain a current security policy that adheres to specifications documented in any of the following? • NIST 800 series • ISO 27000 series • HITRUST • HIPAA	⊠ Yes □ No	ISO 27001 NIST 800-66r1 HIPAA	
1.3	Does the Vendor continuously monitor for new and updated regulations to ensure their product's continued compliance with applicable laws, regulations and best practices?	⊠ Yes □ No □ N/A		
1.4	Does the Vendor have a formal, comprehensive information security program that includes security governance, security risk management and operational security disciplines?	⊠ Yes □ No		
1.5	Does the Vendor have a designated information security officer, or equivalent function, to coordinate, develop, implement, and maintain its Information Security program?	⊠ Yes □ No	Simon Fox-Holmes	
1.6	Does the Vendor clearly define and assign information security responsibilities to designated staff within its organization?	⊠ Yes □ No		
1.7	Does the Vendor have a formal information security training and awareness program?	⊠ Yes □ No		
1.8	Is information security training required for all employees and workforce members who could access Providence data?	⊠ Yes □ No	Information Security training is provided at hire and at a minimum annually.	
1.9	Does the Vendor perform background checks on individuals handling or otherwise accessing Providence's information or information systems?	⊠ Yes □ No		



#	Question	Response	Vendor Comments	Providence Comments
1.10	Does the Vendor require its workforce members to agree to and sign a document addressing the terms and conditions of their employment and a workforce member's: • Acknowledgement of the acceptable use of information and information systems, • Responsibilities for securing and protecting confidential information, • Responsibilities to report potential security events that involve confidential information?	⊠ Yes □ No		
1.11	Does the vendor have a timely process to revoke access to their employees and contractors who have left the organization? (Note: This revocation process should not exceed 24 hours when staff leave under amicable conditions, and revocation should be immediate for staff terminated under adverse conditions.)	⊠ Yes □ No		

2. Development Practices: DO NOT SKIP

#	Question	Response	Vendor Comments	Providence Comments
2.1	Does the Vendor's organization adhere to a formal security development methodology, like Microsoft SDL, OWASP OpenSAMM, or BSIMM? Or, at a minimum, does the Vendor organization build formal security requirements and checkpoints into the development process?	⊠ Yes □ No □ N/A	Elekta has internally developed QMS0196 procedure for medical devices development to meet the security and privacy compliance	
2.2	Does the Vendor secure source code and limit access to only authorized individuals?	⊠ Yes □ No □ N/A	Elekta uses source code repositories linked to employees identities for the access control	



#	Question	Response	Vendor Comments	Providence Comments
2.3	Does the Vendor prohibit the use of production data in non-production environments?	⊠ Yes □ No □ N/A	All data collected from the production systems is anonymized if used in non-production environment	

3. Access Control - General: DO NOT SKIP

'No' or 'N/A' answers require an explanation in the Vendor Comments field

#	Question	Response	Vendor Comments	Providence Comments
3.1	Does the Vendor system and/or service support authentication via a cloud-based Identity Provider solution (e.g., Ping, OKTA, Microsoft, etc.) for Single Sign On (SSO)?	□ Yes □ No ⊠ N/A	Data is hosted by the customer. Elekta email response 11/17: [Elekta] Versa HD consists of Integrity Real Time(RT), Integrity Non Real Time(NRT), XVI and iView workstations that run Windows10 IOT Enterprise LTSC operating system.	On Premise system. Caregiver logs into vendor provided workstation using credentials specific to the application. Providence recommendation: Elekta should develop Active directory or LDAP integration with the Hospital domain. Elekta noted the features is on future product roadmap, Elekta is yet to evaluate release timeline. Response applies to 3.1, 3.2
3.2	Does the Vendor system and/or service support either Multi-Factor Authentication (MFA) or Two Factor Authentication (2FA)?	☐ Yes ☐ No ☑ <mark>N/A</mark>		See 3.1 comment.
3.3	Does the system or service require a unique username (ID) and password?	⊠ Yes □ No □ N/A		
3.4	Does the system or service require that each administrator account have a unique username (ID) and password?	⊠ Yes □ No □ N/A		

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#	Question	Response	Vendor Comments	Providence Comments
3.5	Can individual user sessions lock or be configured to lock (requiring a password before reuse) after 15 or fewer minutes of inactivity? (If the answer is 'No', use the comment field to indicate either an alternative lockout timeframe (e.g., 30 or 60 minutes) or a rationale for not locking a session after a period of inactivity.)	□ Yes ⊠ <mark>No</mark> □ N/A	Elekta devices are installed in a physically restricted environment needing special access to gain entry into the room and the information needs to be always displayed to the clinicians on the User interface to provide an effective patient treatment.	Acceptable due to device being used during medical procedure.
3.6	Can default, published or otherwise disclosed system or service accounts be changed or deleted during or after installing or configuring the system/service for use at Providence?	⊠ Yes □ No □ N/A	Personal passwords are changeable	
3.7	Does the system or service mask passwords during entry, rendering contents in the password field unreadable?	⊠ Yes □ No □ N/A		
3.8	Does the system or service support role-based access control?	⊠ Yes □ No □ N/A		
3.9	Does the system or service support least privileged access? In other words, does the system or service facilitate presenting users with the minimum necessary data elements required to perform a job function?	⊠ Yes □ No □ N/A		

4. Access Control - User Accounts

Are user accounts provisioned and managed using the Vendor system/service rather than Providence AD/LDAP integration or Providence's Identity Provider solution (e.g., Ping, OKTA, Microsoft, etc.)?

☐ No – Skip this section and proceed to the next section

#	Question	Response	Vendor Comments	Providence Comments
4.1	Does the system or service natively perform the following, or can it be configured to do so?	⊠ <mark>Yes</mark> □ No	Windows user accounts are configurable per the Hospital's policy	Windows authentication can be utilized to provide access control.



#	Question	Response	Vendor Comments	Providence Comments
	Following 10 or fewer failed login attempts: • Disable a user's account for at least 15 minutes • Lock a user's account for at least 30 minutes?	□ N/A		
4.2	Does the system or service natively adhere to the following, or can it be configured to do so?	⊠ Yes □ No □ N/A	Windows user accounts are configurable per the Hospital's policy	See 4.1
	Passwords must have a minimum of 8 characters and contain 3 of the 4 criteria below: • At least 1 uppercase letter			
	 At least 1 depercase letter At least 1 lowercase letter At least 1 number At least 1 symbol or special character (e.g., @, #, &, etc.) 			
4.3	Does the system or service natively expire passwords after 365 days or fewer, or can Providence administrators custom configure password expiration parameters in accordance with Providence policy?	⊠ Yes □ No □ N/A	Windows user accounts are configurable per the Hospital's policy	See 4.1
4.4	Does the system or service natively prevent password reuse, or can Providence administrators custom configure password reuse requirements (e.g., prevent a user from using x number of prior passwords)?	⊠ Yes □ No □ N/A	Windows user accounts are configurable per the Hospital's policy	See 4.1
4.5	Does the system or service require users to reset their password upon initial login?	☐ Yes ☑ No ☐ N/A		Providence deployment team responsible to ensure user passwords are reset for the Elekta application upon initial login.
4.6	Does the system or service transmit passwords from the browser (or other input form) to the back-end authentication mechanism using a minimum of protocol of TLS 1.2, and	□ Yes ⊠ No	Passwords are not transmitted over the network	Caregivers are given access to Versa HD workstations with their own



	#	Question	Response	Vendor Comments	Providence Comments
		an encryption algorithm and strength of AES-256?		Eleka update via email 11/17: [Elekta] Caregivers are given access to Versa HD workstations with their own credentials which are changeable by individuals.	credentials which are changeable by individuals.
				Future roadmap request: Active directory or LDAP integration with the Hospital domain will form a future product roadmap, Elekta is yet to evaluate release timeline and will further communicate the plan.	
•	4.7	Does the system or service cryptographically store passwords at rest using a salted non-reversible hash comprised of SHA2 or SHA3 with at least 10,000 salt iterations?	⊠ Yes □ No	Windows default password storage mechanism is used	
		(Acceptable hashing and salting mechanisms include PBKDF2, Balloon, bcrypt, or other industrystandard tools.)			

5. Cryptography: DO NOT SKIP

#	Question	Response	Vendor Comments	Providence Comments
5.1	Does the system or service transmit (internal and external) <i>all</i> data using a minimum protocol of TLS 1.2, and an encryption algorithm and strength of AES-256?	□ Yes ⊠ No	All Elekta devices reside within the privately managed network behind the Elekta supplied firewall and are installed in physically restricted areas	Encryption for data in transit not supported. Elekta noted encryption for data in transit will be considered for future implementation. No estimated timeline.
			[Elekta response 11/17] Elekta's Linac communication infrastructure is protected	Response applies to 5.1, 5.2



#	Question	Response	Vendor Comments	Providence Comments
			by state-of-the-art firewall(Juniper) with isolated networks created for devices to interact with each other within the trust boundary. However few applications reside on the Hospital network to support clinical workflows communicate using proprietary protocols needing data on transit encryption.	
			Data on transit encryption will be considered for implementation in the future releases of Versa HD. Elekta is yet to evaluate release timeline and will further communicate the plan.	
5.2	Does the system or service DISABLE all versions of SSL and older versions of TLS, specifically TLS 1.0 and TLS 1.1?	□ Yes ⊠ No	All Elekta devices reside within the privately managed network behind the Elekta supplied firewall and are installed in physically restricted areas	See comment in 5.1
5.3	Unstructured Data: Does the system or service use a minimum of AES 256-bit encryption to protect <u>all stored confidential or regulated data on all servers</u> , NAS devices, workstations, mobile systems, devices, files shares, portable media, and any other component of the system or service that is used to store Providence information?	□ Yes ⊠ No	All Elekta devices reside within the privately managed network behind the Elekta supplied firewall and are installed in physically restricted areas Elekta response 11/17: [Elekta] Elekta's Linac infrastructure is installed in a physically restricted environment with access to authorized individuals. However Elekta is assessing technologies to	Encryption for data at rest is not supported. Providence recommendation: Vendor should encrypt protected data at rest. Vendor noted encryption will be considered future implementation. Response applies to 5.3 and 5.4



#	Question	Response	Vendor Comments	Providence Comments
			encrypt the databases and file storages where PII/PHI data is stored. Data at rest encryption will be considered for implementation in the future releases of Versa HD.	
5.4	Structured Data: Are <i>all</i> structured data stores (databases) or database fields that store Providence <u>confidential or regulated information</u> encrypted using a minimum of AES-256 bit encryption? (IMPORTANT: If the answer is 'No' or 'N/A', either use the comment field to document the alternate encryption algorithm and strength that is used instead of AES-256, or to document the rationale for not encrypting data.)	□ Yes ⊠ No	All Elekta devices reside within the privately managed network behind the Elekta supplied firewall and are installed in physically restricted areas	See comment in 5.3
5.5	Are cryptographic keys stored in a secure key vault that protects keys from unauthorized access and use?	□ Yes ⊠ No	Cryptographic keys are not used on the system	Vendor is not encrypting anything, thus there are no keys to manage.

6. Logging: DO NOT SKIP

#	Question	Response	Vendor Comments	Providence Comments
6.1	Are audit logs available for at least 90 days for non-PHI/regulated activities and one year for PHI related activities?	⊠ Yes □ No □ N/A		
6.2	Does the system or service protect against log tampering by preventing non-administrative users from altering or deleting log content?	⊠ Yes □ No □ N/A		
6.3	Do audit logs capture at least the following information: Successful logins, failed logins, data views, data modifications, and data deletions?	⊠ Yes □ No □ N/A	Partial information is logged such as successful logins, failed logins	Partial logging by Elekta.



#	Question	Response	Vendor Comments	Providence Comments
6.4	Does the Vendor system maintain logs that record access to specific records within the application, including which user accessed the record and when?	□ Yes ⋈ No □ N/A	Elekta response via email 11/17: [Elekta] PHI/PII CRUD operations by the authenticated users will be considered in the future releases of Linac. Elekta is yet to evaluate release timeline and will further communicate the plan. Elekta response 11/17: [Elekta] Application user actions related to accessing of sensitive records will be considered in the future releases of Linac. Elekta is yet to evaluate release timeline and will	Logging is occurring in Mosaiq and Epic. Acceptable response Acceptable. See 6.3
6.5	Are all server modifications logged?		further communicate the plan.	
0.5	Are all server mounications logged?	⊠ Yes □ No □ N/A		

7. Mobile Devices (Providence facilities or remote)

Will the Vendor solution, or components of solution, use mobile devices (iOS or Android systems) and/or a mobile app? (Note: mobile devices accessing a service through a web browser are not in scope for this question.)

☐ Yes – Answer the questions below

☑ No – Skip this section and proceed to the next section

#	Question	Response	Vendor Comments	Providence Comments
7.1	Does the Vendor's solution require users to enter a password, PIN, and/or biometric authentication mechanism in order to access mobile application content?	☐ Yes ☐ No ☐ N/A		



#	Question	Response	Vendor Comments	Providence Comments
7.2	Does the mobile application time out after 15 or fewer minutes of inactivity, requiring a user to re-enter a password, PIN, or re-initiate a biometric authentication mechanism before app content can be viewed again?	□ Yes □ No □ N/A		
7.3	Does the mobile app store data locally on the device in a containerized, encrypted state?	☐ Yes ☐ No ☐ N/A		
7.4	Can Providence or authorized administrators delete Providence data or render Providence data unreadable when an employee or workforce member's access is terminated?	☐ Yes ☐ No ☐ N/A		
7.5	Is the mobile application capable of single sign-on (SSO) through an online identity provider service (e.g., OKTA, Ping, Microsoft, etc.) or via LDAP/Active Directory?	☐ Yes ☐ No ☐ N/A		

8. On-premises (Providence facilities) or Providence-Managed Cloud Tenants Solutions

Will the Vendor solution, or components of solution, be installed on assets within Providence-managed facilities or cloud environments, such facilities or cloud environments include datacenters, Azure or AWS tenants, server closets, offices, clinical locations or any other Providence owned or leased facilities?

 \square No – Skip this section and proceed to the next section

#	Question	Response	Vendor Comments	Providence Comments
8.1	Does the Vendor agree to use the Providence-provided VPN for remote access to the Providence network rather than Vendor remote access/support tools? (Providence currently uses Citrix for remote VPN support.)	□ Yes ⊠ <mark>No</mark> □ N/A	Versa HD Intellimax connects to the Elekta network using FIPS 140-2 complaint module which uses Secure Socket Layer (SSL), using 256 bit AES encryption through TCP port 443	Providence business must commit to on-site support. Elekta does not agree to use Providence provided VPN, CITRIX. Vendor wishes to use a remote access tool which is not approved for use by Providence, called IntelliMax.



#	Question	Response	Vendor Comments	Providence Comments
8.2	For times when the Vendor must access the Providence network (including Providence cloud tenants) to fulfill obligations under the Master Services Agreement or other contractual obligations, will only United States-based Vendor personnel and resources access Providence networks, network assets, cloud tenants, data, and information systems?	□ Yes □ No ⊠ N/A	Versa HD Intellimax enables connection to the Elekta device network, but not to gain access to the Hospital network	IT contracting team should be informed of non-US geographies, to ensure appropriate legal provisions are included in the contract to protect Providence data.
8.3	Will all servers, workstations and/or other components of the Vendor's solution run on an operating system (OS) that is currently supported by the OS vendor or open source community?	⊠ Yes □ No □ N/A		
8.4	Can the OS or OSs supporting the Vendor's system(s) be updated to a newer version when the current OS approaches end of support?	⊠ Yes □ No □ N/A		
8.5	Can Providence manage updates on the server, workstation, and/or other device's OS?	☐ Yes ☑ No ☐ N/A	Elekta will assess relevant security fixes and release patches to the products through design change process.	Implementation team collaborate with vendor ensure vendor response process is documented.
8.6	Can Providence manage updates on third Party applications (non-OS applications such as Adobe Acrobat, web browsers, etc.)?	☐ Yes ☑ No ☐ N/A	Elekta will assess relevant security fixes and release patches to the products through design change process.	Implementation team collaborate with vendor ensure vendor response process is documented.
8.7	Can the Vendor's solution be deployed and operationalized in a configuration where the application and data storage components (e.g., databases or file storage systems) can reside and operate on separate physical or virtual servers?	⊠ Yes □ No □ N/A	Elekta supplies the required infrastructure including firewall, servers and necessary equipment's required for the secure operation of devices	
8.8	Can data stores (e.g., databases or file storage systems) containing confidential or regulated information	⊠ Yes □ No	Elekta creates privately managed network and hosts the infrastructure in that	



#	Question	Response	Vendor Comments	Providence Comments
	be logically located in a secure network segment that is separated (by a firewall or restrictive ACLs) from application servers, workstations, and other system components?	□ N/A	network for the secure operation of devices	
8.9	Can Providence administrators install a Providence-managed anti-malware client (running real-time scanning on a continuous basis) on the Vendor solution's servers, workstations, and/or other applicable devices? (If YES, list all directories and file types that must be excluded by the anti-malware client.)	□ Yes ⊠ No □ N/A	[Comment required for 'Yes' answers on this question]:	Medical device attached to vendor provided workstation. Implementation team and Providence support team to collaborate with vendor to ensure this vendor antimalware process is documented.
8.10	Can Providence administrators install a Providence-managed host-based firewall client on the Vendor solution's servers, workstations, and/or other applicable devices?	□ Yes ☑ <mark>No</mark> □ N/A	Elekta supplies the state of art dedicated firewall to safeguard the devices operating inside the privately managed network	
8.11	Can Providence conduct system backups using a method of Providence's choosing, including encrypting any backups?	□ Yes ⊠ <mark>No</mark> □ N/A	Versa HD comes with a shared space through which the Hospitals can take backup of the information and store per their own method	Patient data is backed-up via other connected systems. Mosaiq, Epic, etc
8.12	Can Providence conduct credentialed/authenticated vulnerability scans on all Vendor servers and other Vendor systems without disrupting the operations of these systems?	□ Yes □ No ⊠ N/A	Elekta doesn't recommend running vulnerability scans, while the device is operational and in clinical use	Implementation team to collaborate with Providence vulnerability scan team for planned scanning.
8.13	Can the Vendor solution be deployed so that end users do not need local administrative privileges on workstations or systems running the application?	⊠ Yes □ No □ N/A	End users doesn't need admin privileges on the device.	
8.14	Can Providence either install full disk encryption software on servers and/or workstations, or does the Vendor provide full disk encryption capabilities as part of its solution?	☐ Yes ☑ No ☐ N/A	Elekta doesn't recommend enabling disk encryption on as it might affect the functionality and performance of the device.	Bitlocker should be able to be run on the Windows 10 machine.



#	Question	Response	Vendor Comments	Providence Comments
8.15	Does the system or service delete regulatory or other confidential information from local storage, temporary files, and memory upon logging out of or shutting down the application?	□ Yes ⊠ No □ N/A	Hospital users are given privileges to manage this information on the devices	Implementation team to ensure customer has ability to delete this data and manage in accordance with Providence policies. Recommend vendor develop this feature into future iteration of the product.
8.16	Can logs be sent to or retrieved by the Providence SIEM by using a standard log format?	□ Yes ☑ No □ N/A		Recommend vendor develop this feature into future iteration of the product.
8.17	In the event of a zero-day or other emerging critical vulnerability, does the vendor either notify customers or provide documentation about which models, firmware versions, etc. may be impacted, and which patches, interim or indefinite compensating controls, or other corrective measures can be implemented to address the risk?	⊠ Yes □ No □ N/A	Elekta has established Post-Market surveillance framework to assess vulnerabilities and publishes cybersecurity advisories on the Elekta portal to download by the customers https://community.elekta.com/	
8.18	Does the Vendor provide documentation that indicates which services and ports are needed for the solution to operate effectively?	⊠ Yes □ No □ N/A	EMLA Site planning guide list all the ports, protocols used by the device for its operation	
8.19	Can vulnerable protocols such as FTP, TFTP, Telnet, VNC, etc. be disabled?	☐ Yes ☑ No ☐ N/A	VNC is used within the Elekta network behind the firewall	Unnecessary services must be disabled. Providence implementation team can engage Security Architecture to discuss further.
8.20	Can either Providence or the Vendor disable non-essential services and unneeded ports?	☐ Yes ☑ No ☐ N/A		See 8.19

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#	Question	Response	Vendor Comments	Providence Comments
8.21	Does the Vendor or a Vendor-contracted third-party (subcontractor) test the system or service for security vulnerabilities? (IF YES, please list the frequency of these tests in the Vendor Comments section.)	⊠ Yes □ No □ N/A	[Comment required for 'Yes' answers on this question]: Elekta's Digital Product Security Team tests the system for security vulnerabilities. Systems are scanned prior to the release.	
8.22	Does the system or service exclude hard-coded passwords?	□ Yes ☑ No □ N/A	User passwords are changeable but few service accounts have hard coded passwords that used internally and surrounded by the other security controls Vendor update 12/5/22: Service accounts are noninteractive which means not directly accessible to login from the Operating System console or Application user interface. Service accounts are internal accounts used by applications to run software services inside the devices. They are only known to application developers and sometimes revealed to system administrators for trouble shooting and maintenance but remain same across machines and customers. Additional security controls: Accounts are not made visible and unknown to all users. Applications run in an isolated and Elekta managed private network. Elekta devices are installed in a physically restricted environment with a Host	Hard-coded passwords should not be the same across devices. Elekta services accounts are used by the application itself for running application services within the device versus vendor support administrator accounts. Additionally, despite the accounts being the same across devices, their updates greatly reduced the risk presented in their initial response.



#	Question	Response	Vendor Comments	Providence Comments
			based firewall for network protection and isolation.	

9. Cloud or Vendor Hosted Security

Will the Vendor solution, or components of the solution, be Software as a Service (SaaS) or a Vendor hosted service?

 \square Yes – Answer the questions below

 $\ oxdot$ No – Skip this section and proceed to the next section

#	Question	Response	Vendor Comments	Providence Comments
9.1	Are development, test, and production environments separated from each other either logically or physically?	□ Yes □ No □ N/A		
9.2	Is a formal change management procedure documented and implemented?	☐ Yes ☐ No ☐ N/A		
9.3	Are system and application patches applied in accordance with the following timelines: • <24 hours for "Zero Day" (i.e., vulnerabilities that are being actively exploited in the wild) • <30 days for critical and highrisk vulnerabilities (on all systems and applications) • <30 days for medium-risk vulnerabilities on Internetfacing systems and applications • <60 days for medium-risk vulnerabilities on Internally-facing systems and applications	□ Yes □ No □ N/A		
9.4	Are vulnerability scans conducted against all internal and external systems and applications at least quarterly and after any significant system or application changes?	☐ Yes ☐ No ☐ N/A		



#	Question	Response	Vendor Comments	Providence Comments
	(Examples of vulnerability scans include host and application scanning conducted by an industry-standard scanning tool or service like, but not limited to, Qualys, Rapid7, or Tenable Nessus.)			
9.5	Are critical, high, and medium risk vulnerability scan findings remediated within a clearly defined and documented timeframe that does not exceed 30 days for critical, high-risk, and Internet-facing medium-risk vulnerabilities, and 60 days for all other medium-risk vulnerabilities?	□ Yes □ No □ N/A		
9.6	Does the Vendor conduct, or contract, penetration testing on all external facing components of their production environment at least annually or after any significant system or service changes?	☐ Yes ☐ No ☐ N/A		
9.7	Are critical, high, and medium risk penetration test findings remediated within a clearly defined and documented timeframe that does not exceed 30 days for critical, high-risk, and Internet-facing medium-risk vulnerabilities, and 60 days for all other medium-risk vulnerabilities?	□ Yes □ No □ N/A		
9.8	Is the hosted environment deployed with a network firewall at the perimeter that is configured to address security risks at Layers 3, 4, and 5 of the OSI Model?	☐ Yes ☐ No ☐ N/A		
9.9	Is the service architected with a minimum of three separate tiers: web services, application, and storage/database?	☐ Yes ☐ No ☐ N/A		
9.10	Is the hosted service's architecture configured in such a way that data stores (e.g., databases or file storage systems) containing confidential or regulated information are logically	☐ Yes ☐ No ☐ N/A		



#	Question	Response	Vendor Comments	Providence Comments
	located in a secure network segment that is separated from application servers, web servers, workstations, the Internet, and other systems by a firewall or restrictive ACLs?			
9.11	Is the hosted service's architecture deployed and configured in such a way that there is a web application firewall to protect the application (primarily Layer 7, but other layers as applicable) components of the service?	☐ Yes ☐ No ☐ N/A		
9.12	Are network intrusion detection systems / intrusion prevention systems (IDS/IPS) in place and configured to detect threats and protect the environment from attack?	□ Yes □ No □ N/A		
9.13	Does the Vendor actively monitor their cloud/hosted services environment (in real or near real-time) for security incidents?	☐ Yes ☐ No ☐ N/A		
9.14	Does the Vendor have an established security incident management program that complies with legal and regulatory requirements related to incident/breach reporting and notification?	☐ Yes ☐ No ☐ N/A		
9.15	Does the Vendor have dedicated security staff used for responding to security incidents?	☐ Yes ☐ No ☐ N/A		
9.16	Is there a security incident notification process for notifying Providence of a security event that could adversely impact system availability or adversely impact the confidentiality or integrity of Providence data?	☐ Yes ☐ No ☐ N/A		
9.17	Do the Vendor's policies, standards, and service configurations prohibit storing confidential or regulated data in any external/internet-facing network segment?	☐ Yes ☐ No ☐ N/A		



#	Question	Response	Vendor Comments	Providence Comments
9.18	Will Providence confidential and/or regulated data be accessed or administered by Vendor personnel exclusively within the United States?	☐ Yes ☐ No ☐ N/A		
9.19	Are information security requirements embedded within the Vendor's Business Continuity and Disaster Recovery Plans and Processes?	☐ Yes ☐ No ☐ N/A		
9.20	Does the Vendor maintain a current, formal certification or compliance report related to any of the following certifications or assessments? • ISO 27001 Certification • HITRUST Certification • FedRAMP Ready • FedRAMP Authorized • SSAE 16 or 18 SOC 2 Report	□ Yes □ No □ N/A		
9.21	Does the Vendor encrypt and physically secure all system backup media that contains Providence data?	☐ Yes ☐ No ☐ N/A		
9.22	Has the Vendor implemented procedures and controls to safeguard its datacenter facility and equipment from unauthorized physical access or theft, or does the Vendor use a public cloud service provider (e.g., AWS, Azure, GCP, etc.) that implements such physical security procedures and controls?	□ Yes □ No □ N/A		
9.23	Does the Vendor log physical access to facilities that contain Providence information, or does the Vendor use a public cloud services provider (e.g., AWS, Azure, GCP, etc.) that logs physical access to its facilities that contain Providence information?	☐ Yes ☐ No ☐ N/A		

10. Vendor Back-Office Security





Will Providence data be stored, processed or transmitted within the Vendor's back-office, or Vendor company internal network, environment?

(<u>Note</u>: Most Vendors will skip this section, unless the Vendor stores, processes, or transmits Providence data on their office network rather than a dedicated cloud service or data center hosting environment. Only complete this section if Providence data will be stored, processed, or transmitted in a back-office network environment—meaning the environment that provides connectivity to the Vendor's workstations, mobile devices, or servers that are used to support the daily operations of its business, like emails, web browsing, conference calls, and misc. core business applications.)

☐ Yes – Answer the questions below

☑ No – Skip this section and proceed to the next section

'No' or 'N/A' answers require an explanation in the Vendor Comments field

#	Question	Response	Vendor Comments	Providence Comments
10.1	Has the Vendor implemented a formal asset management program, including inventory of authorized devices and software?	☐ Yes ☐ No ☐ N/A		
10.2	Has the Vendor implemented procedures and controls to safeguard its facility and equipment from unauthorized physical access or theft?	☐ Yes ☐ No ☐ N/A		
10.3	Does the Vendor have a procedure for addressing lost devices such as laptops, cell phones, tablets, etc.?	☐ Yes ☐ No ☐ N/A		
10.4	Does the Vendor have physical security controls such as card control entry, security cameras, and uniformed security officers?	☐ Yes ☐ No ☐ N/A		
10.5	Does the Vendor log physical access to facilities that contain Providence confidential and/or regulated data?	☐ Yes ☐ No ☐ N/A		
10.6	Does the Vendor use Enterprise secure wireless protocols for controlling access to wireless networks?	☐ Yes ☐ No ☐ N/A		
10.7	Are server closets or smaller datacenters that host systems that store, process, or transmit Providence	□ Yes		

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#	Question	Response	Vendor Comments	Providence Comments
	confidential or regulated data physically secured using locks, cameras, or other physical security controls?	□ N/A		
	(If "other physical security controls" are used, please explain those in the Vendor Comments section.)			
10.8	Does the Vendor log and monitor access to any server closets or smaller datacenters that host systems that store, process, or transmit Providence confidential or regulated data?	☐ Yes ☐ No ☐ N/A		
10.9	Are workstations and servers protected by host-based anti-malware applications?	☐ Yes ☐ No ☐ N/A		
10.10	Are workstations and servers protected by host-based intrusion detection and protection applications?	☐ Yes ☐ No ☐ N/A		
10.11	Are workstations and servers protected by host-based firewalls?	☐ Yes ☐ No ☐ N/A		
10.12	Does the corporate network reside behind a network firewall that separates the corporate network from the Internet and other less secure networks or online services?	☐ Yes ☐ No ☐ N/A		
10.13	Are activities on the corporate network monitored by a Security Operations Center (or equivalent function) that is staffed and equipped with people, processes and technologies to rapidly respond to and remediate information security events?	□ Yes □ No □ N/A		
10.14	Has the Vendor deployed data-loss prevention technologies that can detect and block attempts to exfiltrate confidential or regulated data?	☐ Yes ☐ No ☐ N/A		



#	Question	Response	Vendor Comments	Providence Comments
10.15	Does the Vendor encrypt and physically secure all workstations, laptops, mobile devices and portable media that are used to store, process or transmit Providence confidential or regulated information?	☐ Yes ☐ No ☐ N/A		
10.16	Does the Vendor use Internet filtering technologies that block access to known malicious websites and website categories that might represent a security risk to Providence confidential or regulated data?	☐ Yes ☐ No ☐ N/A		
10.17	Does the Vendor use mobile device management technologies that manage the security on companyowned and employee-owned mobile devices used to store, process or transmit Providence confidential or regulated information?	☐ Yes ☐ No ☐ N/A		
10.18	Does the Vendor centrally configure and manage secure configurations on their corporate workstation and server environment using tools like Active Directory, JAMF, or similar technologies?	☐ Yes ☐ No ☐ N/A		
10.19	Does the Vendor patch its corporate network assets (workstations, servers, appliances, etc.) in accordance with the following timelines: • <24 hours for "Zero Day" (i.e., vulnerabilities that are being actively exploited in the wild) • <30 days for critical and highrisk vulnerabilities (on all systems and applications) • <30 days for medium-risk vulnerabilities on Internetfacing systems and applications • <60 days for medium-risk vulnerabilities on Internally-	□ Yes □ No □ N/A		



#	Question	Response	Vendor Comments	Providence Comments
	facing systems and applications			
10.20	Does the Vendor conduct vulnerability scans on all internet-facing corporate network assets at least quarterly?	☐ Yes ☐ No ☐ N/A		
10.21	Does the Vendor conduct credentialed/authenticated vulnerability scans on all internal corporate network assets at least quarterly?	□ Yes □ No □ N/A		
10.22	Does the Vendor remediate discovered vulnerabilities within the following timelines: • <24 hours for "Zero Day" (i.e., vulnerabilities that are being actively exploited in the wild) • <30 days for critical and highrisk vulnerabilities (on all systems and applications) • <30 days for medium-risk vulnerabilities on Internet-facing systems and applications • <60 days for medium-risk vulnerabilities on Internally-facing systems and applications	□ Yes □ No □ N/A		
10.23	Does the Vendor logically deploy data stores (e.g., databases or file storage systems) containing confidential or regulated information within in a secure network segment that is separated (by a firewall or restrictive ACLs) from workstations and other less secure system components?	□ Yes □ No □ N/A		
10.24	Does the Vendor conduct security assessments on their business partners and any other Vendor that will directly or indirectly interact with Providence confidential or regulated data?	☐ Yes ☐ No ☐ N/A		



#	Question	Response	Vendor Comments	Providence Comments
10.25	Does the Vendor use an email filtering technology to protect its network against phishing, malware, and other email-based attacks?	☐ Yes ☐ No ☐ N/A		
10.26	Does the Vendor have a threat intelligence team, or similar function, that continuously monitors external threat feeds and other sources for information about new cyber threats and mechanisms for defending against them?	□ Yes □ No □ N/A		

11. Downstream Third-Party Vendors or Business Associates

Will Providence data be stored, processed, transmitted, or accessed by a Vendor subcontractor?

(Note: In the questions below, "Subcontractor" means any individual, corporation, partnership, joint venture, limited liability company, or other such entity that is, at any time during the term of an agreement with Providence, performing work on behalf of the Primary Vendor (meaning the company or organization completing this assessment questionnaire.)

☐ Yes – Answer the questions below

☑ No – Skip this section and proceed to the next section

'No' or 'N/A' answers require an explanation in the Vendor Comments field

#	Question	Response	Vendor Comments	Providence Comments
11.1	Prior to initiating the services of a Subcontractor, does the Vendor conduct an information security assessment on Subcontractor solutions or services that could impact Providence data (i.e., where the Subcontractor solution or service will involve the storage, processing, transmission, or access of Providence data)?	□ Yes □ No □ N/A		
11.2	Does the Vendor also conduct periodic information security reassessments of Subcontractor solutions or services throughout the duration of the contract with the Subcontractor?	☐ Yes ☐ No ☐ N/A		
11.3	For times when the Vendor's Subcontractors must access the Providence network or data (including	□ Yes		

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#	Question	Response	Vendor Comments	Providence Comments
	Providence cloud tenants) to fulfill obligations under the Subcontractor agreement or other contractual obligations, will only United Statesbased Vendor personnel and resources access Providence networks, network assets, cloud tenants, data, and information systems?	□ N/A		
11.4	For times when the Vendor's Subcontractor must access resources or data on the Providence network or cloud environment, will the Vendor agree to ensure that Subcontractors will use only the Providence-provided VPN for remote access to the Providence resources (rather than Vendor or Subcontractor remote access/support tools)? (Providence currently uses Citrix for	☐ Yes ☐ No ☐ N/A		
	remote VPN support.)			
11.5	Does the Vendor ensure that the Subcontractor signs a Business Associates Agreement (BAA) for Subcontractor solutions or services that will or may store, process, transmit, or access Providence regulated Protected Health Information (PHI)?	□ Yes □ No □ N/A		
11.6	Does the Vendor hold Subcontractors contractually accountable to provide sufficient information security safeguards consistent with the NIST Cybersecurity Framework or other industry-recognized cybersecurity framework, including the identification and remediation of threats and vulnerabilities, in order to address security risks and threats (and assure HIPAA compliance, but only if PHI is involved)?	□ Yes □ No □ N/A		





The last section is to be filled out by Providence Enterprise Information Security. If you have answered all of the above questions to the best of your knowledge, please send this form and any supporting documents to your assigned Providence Information Security Representative or primary Providence stakeholder.

* * * Items below are to be completed by Providence Information Security * * *

General Information:

Analyst Information			
EIS Analyst Name: Trevor Worrell	EIS Analyst Title: Senior Information Security Analyst		
Date Assessed: 12/6/2022	Peer Reviewer (Optional): Dave Thompson		
Business Stakeholder Ownership and Use Information			
Providence Owner Name: Valerie Spinetta, Ty Walker, Ownership changing during investigation	Providence Contract Manager or Project Manager: Blake Harker		
Business Unit: Oncology	Providence C-Level Sponsor: Steve Ellithorpe		
Location where the system or service will be used:	☑ Enterprise (used throughout Providence)		
	☐ Specific Providence Location or Ministry, <u>list all</u> that apply:		
	• [Location 1]		

Review Rating:

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Item	Area	Status
1	Security Within Providence's Environment	 □ Satisfactory □ Satisfactory with Conditions ⋈ Fail □ N/A
2	Hosted Application Security	 □ Satisfactory □ Satisfactory with Conditions □ Fail ⋈ N/A

Document findings, risk, and any relevant recommendations or notes related to the review:

Review Summa	ry:			
⊠ Fail	Providence Enterprise Information Security (EIS) conducted a review of Elekta Versa HD and assigned a Fail rating based on the responses and information provided by the Vendor. The assessment determined that the system or service is not compliant with Providence requirements (i.e., policies, standards, regulatory requirements, contractual and legal obligations, and relevant federal, state, and local laws) and represents a material risk to Providence systems and/or data. Use of this system or service is not permitted.			
Observation #	Observation Description	Risk Rating and Tracking		
Observation 1	Corresponding Question #: Section 4 Finding Description: System does not enforce controls for 4.5 and 4.6, initial password reset or transmitting passwords over the network, however Providence is responsible for managing accounts according to the vendor, therefore can also manage these controls. Risk Description: If Providence does not manage accounts correctly, they could be at risk for compromise.	 □ Very High □ High □ Moderate ⋈ Low □ Very Low 		
	Risk Rationale: The Impact is High because user credentials represent secrets that only the user should know. The Likelihood is Low because Providence can manage the accounts. The overall Risk Rating is Low because Providence can manage the accounts.	Tracked in Risk Register: □ Y ⋈ N Risk Register #: Click here to enter text.		



	Recommendation: All system and user accounts must align to:	
	https://phs-phs.policystat.com/policy/9850316/latest	
	<u>Disposition/Outcome</u> : Future Elekta roadmap request: Active directory or LDAP integration with the Hospital domain will be part a future product roadmap, Elekta is yet to evaluate release timeline and will further communicate the plan.	
	Responsibility is on the Providence caregivers to manage passwords in accordance with Providence policy and standards.	
Observation 2	Corresponding Question #: Section 5	□ Very High
	<u>Finding Description</u> : Vendor does not use encryption to protect data while in transit or while data is at rest.	⊠ High
		□ Moderate
	Risk Description: No encryption is used to protect protected data while in transit or while data is at rest.	□ Low
	Recommendation: Ensure all infrastructure components which involve	□ Very Low
	network communication use encryption. For SSL/TLS traffic, this relates to TLSv1.2. For database connectivity, the specific protocol version may verify but the underlying ciphers should meet the cipher	Tracked in Issues Register: ⊠ Y □ N
	strengths identified in the link above. Network communications protocols should use encryption, such as	Issue Register #: TBD
	TLSv1.2 which provide ciphers which align with Providence Cryptographic Protection Standards: https://phs- phs.policystat.com/policy/9850405/latest	
	Data stores (file systems or databases) containing regulated and other confidential information should be encrypted with a minimum of AES-256.	
	<u>Disposition/Outcome</u> : Assessment Fails based on this finding.	
Observation 3	Corresponding Question #: 8.1	□ Very High
	<u>Finding Description</u> : Vendor does not agree to use the Providence-provided VPN for remote access to the Providence.	□ High
	Risk Description: IntelliMax is not the Providence standard, and	□ Moderate
	IntelliMax uses VNC which has failed the Providence VSA, and is not an approved solution for remote support at this time.	⊠ Low
	As long as on-site support is used, this reduces the risk to Low.	□ Very Low



Ohaamustian 4	Recommendation: Implementation team should work Providence Security Architecture team to determine if alternate solutions can be reached. Disposition/Outcome: Via Teams meeting on 12/1/22 - Providence IS business, Ty Walker's team has committed to use on-site support.	Tracked in Issues Register: □ Y ⋈ N Issues Register #: TBD
Observation 4	Corresponding Question #: Section 8.5-8.16 Finding Description: Providence support team responsible to collaborate with vendor on multiple security controls in section 8. Recommendation: See blue highlighted items for Providence responsibilities.	Tracked in Issue Register: □ Y ⊠ N
Observation 5	Corresponding Question #: 8.14, 8.19, 8.20 Finding Description: Vendor does not meet requirements for these controls. Risk Description: 8.14 - Disk Encryption - see Observation # 2 8.19, 8.20 - Protocols and Ports - Active unnecessarily increases risk of unauthorized access Recommendation: These items must be remediated. Disposition/Outcome: TBD	 □ Very High □ High □ Moderate □ Low □ Very Low Tracked in Issues Register: □ Y □ N Issues Register #: TBD



NIST Risk Tables:

TABLE I-2: ASSESSMENT SCALE - LEVEL OF RISK (COMBINATION OF LIKELIHOOD AND IMPACT)

Likelihood hreat Event Occurs			Level of Impact		
and Results in Adverse Impact)	Very Low	Low	Moderate	High	Very High
Very High	Very Low	Low	Moderate	High	Very High
High	Very Low	Low	Moderate	High	Very High
Moderate	Very Low	Low	Moderate	Moderate	High
Low	Very Low	Low	Low	Low	Moderate
Very Low	Very Low	Very Low	Very Low	Low	Low

TABLE I-3: ASSESSMENT SCALE - LEVEL OF RISK

Qualitative Values	Semi-Qua Valu		Description
Very High	96-100	10	Very high risk means that a threat event could be expected to have multiple severe or catastrophic adverse effects on organizational operations, organizational assets, individuals, other organizations, or the Nation.
High	80-95	8	High risk means that a threat event could be expected to have a severe or catastrophic adverse effect on organizational operations, organizational assets, individuals, other organizations, or the Nation.
Moderate	21-79	5	Moderate risk means that a threat event could be expected to have a serious adverse effect on organizational operations, organizational assets, individuals, other organizations, or the Nation.
Low	5-20	2	Low risk means that a threat event could be expected to have a limited adverse effect on organizational operations, organizational assets, individuals, other organizations, or the Nation.
Very Low	0-4	0	Very low risk means that a threat event could be expected to have a negligible adverse effect or organizational operations, organizational assets, individuals, other organizations, or the Nation.