Table 2

Corrective Action Plans per IAAA Component

Corrective Action Plans per IAAA Component	
Identification Risk ID	R-1
Corrective Action ID	CA-1
Risk (Threat / Vulnerability)	High
Action Priority	High
Selected Planned Controls	An administrative UI/ dashboard should be created for an assigned admin.
Description Required Resources	 Admin list of system users UI Admin authorization UI Admin authentication UI Admin audit log UI Admin create new user Admin delete user Software resources
Accountability	
Risk ID	R-2, R-3
Corrective Action ID	CA-2
Risk (Threat / Vulnerability)	High
Action Priority	High
Selected Planned Controls	Specific changes made in the system in a specific affected resource should be recorded through audit log implementation, as well as to make it available for review by authorized users.
Description Required Resources	Audit log composed of: User access time User access date User name/identification User activity User affected resource for change Success and rejected indication for log in Device identity Software resources
Authentication	
Risk ID	R-6
Corrective Action ID	CA-3
Risk (Threat / Vulnerability)	High
Action Priority	High
Selected Planned Controls	Forced re-authentication / Automatic log-off
Description	A functionality in the system which allows the future IAM administrator to configure the idle session timeout (in minutes) with the following options: • 15 minutes • 30 minutes
Required Resources	Otoscopia's system documentation
Risk ID	R-7
Corrective Action ID	CA-4
Risk (Threat / Vulnerability)	Medium
Action Priority	High
Selected Planned Controls	Forced password change
Description	Functionalities in the system which allows the future IAM administrator to perform the

following:

- Select password expiration duration
- Select password expiration grace period
- View the final password expiration date

Options for the password expiration duration include:

- 60 days
- 90 days
- 180 days
- 270 days
- 365 days (1 year)

Options for the password expiration grace period include:

- 1 day
- 5 days
- 2 days
- 6 days 7 days (1 week)
- 4 days

3 days

Required Resources

Otoscopia's system documentation

Authorization

Risk ID

R-8, R-9, R-10,R-11

Corrective Action ID

CA-5

Risk (Threat / Vulnerability) Medium to High

Action Priority

High

Selected Planned Control

Creation of an administrative user interface (UI) that will cater to the authorization functionalities

Description

A user with administrative privileges has the following responsibilities:

- Role Management
- User Account Management (e.g. activation or deactivation of either temporary or non-temporary user accounts)
- **Identity Collections Management**
- Approval Workflows Management (activation, modification, disablement, and removal of user accounts)
- User's Access Privileges Management
- Authorization Management (e.g. location tracker of users having authorized access to electronically protected health information)
- Information Access Management
- Access Review Management

Admin User's Dashboard Privilege:

- Includes a summary report on the dashboard about other users' access and activities
- Dashboard is set as the landing page;
- **Required Resources** Digital Ocean subscription
 - Final adoption of the access control policy based on previous system documentation

Risk ID

R-10

Corrective Action ID

CA-6

Risk (Threat / Vulnerability) High

Action Priority

High

Selected Planned Controls

Access Control List

Description

A table format listing the permissions associated with the electronic medical records and storing the privileges assigned to users with specifications on the control type of operations, such as 'read', 'create', 'update', and 'delete'.

Required Resources

• Previous documentation about the EMR System

Audit of the EMR system

Risk ID

R-8, R-10, R-11

Corrective Action ID CA-7

Risk (Threat / Vulnerability) Medium to High

Action Priority High

Selected Planned Controls

Adapt Access Control Policy and Procedures based on Role-based Access Control (RBAC)

and Attribute-Based Access Control (ABAC)

Description

Address compliance procedures based on RBAC and ABAC, as well as user account management procedures

Implementation of Policy and Procedures must consider the following:

- Protection of transmitted electronic health information from improper modification, alteration, or destruction without detection until disposed of;
- Maintenance of access only to those persons who have been granted access rights;
- Conditions for disabling or deactivating accounts, including when individuals are transferred or terminated.

Role-based Access Control

- Authorizing access only when such access is appropriate based on the user's role or healthcare functions;
- Allowing request and approval processes for changes in user assignments;
- Setting roles and role restrictions/interactions; and
- Determining access requirements based on what roles need to be created and what information needs to be associated with which role.

RBAC considers the following:

- Role Definition
- Role assignment
- Permission assignment
- Role-based provisioning
- Regular reviews and audits

ABAC considers the following:

- Classification of subject;
- Classification of objects;
- Classification of environmental conditions;
- Classification of attributes for subjects, objects, and environmental conditions;
- Previous documentation about the EMR System
- Audit of the EMR system

Required Resources