

I3C

Security Use Cases

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Use Case I

- **Two organizations form a collaboration where researchers are given access to proprietary databases (e.g. histopathology databases).**
- **Researchers are given access to only a subset of the data.**
- **There is often a need to disallow access to certain data (name, SSN, etc) but allow access to other information (phenotype, affected status, etc).**



Use Case II

- **A database of phenotype/genotype and drug sensitivity data has been made available to an international group of researchers collaborating over the Internet.**
- **Patients are asked to fill in diagnostic forms on the website. Patients are not allowed to modify their answers. Full confidentiality of the patients' contact information is required by law.**
- **Doctors are only allowed to see the inputs from a subset of patients whom they have been assigned to.**

Common Requirements

- **FDA requirements enforce digital signature of documents, experiments, and samples**
- **Must ensure identity and authority in computer systems**
- **Must provide facility to disallow access to subsets of data**
- **Often set up a hierarchy of role based query and access control**
- **Must provide means to disallow identification of patient based on analytical results and samples taken from patient**

Why Security is Critical in Life Sciences?

- **Enable Collaboration**
- **Protect Intellectual Property**
- **Comply with Regulatory Requirements**
 - 66% of health care providers' top priority would be upgrading security on IT systems to meet **HIPAA** requirements – *HIPAA survey*
 - Y2K is 20%-25% in scale compared to the **21 CFR Part 11** challenge – *IDC*
 - The industry-wide cost of **Part 11** compliance would reach \$2 billion by 2006 - *The Pharmaceutical Research and Manufacturers of America*
- **Reduce Financial Risks**

Protect Intellectual Property

- **First to Invent Rule**

- One page of electronic experiment data could cost millions in an IP lawsuit.

- **Maintain the integrity of the legally-defensible records for a long period of time**

- Time stamp
- Write once
- Signed by the researcher and the witness

21 CFR Part 11

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- **Part 11 establishes the criteria under which the FDA considers **electronic records** and **electronic signatures** *"to be trustworthy, reliable, and generally equivalent to paper records and handwritten signatures."***
- **FDA's Stance on Part 11**
 - **Primary concern: ensuring public health and safety**
 - **Risk-based compliance**
 - **\$500 million fine paid for plant violations by large pharmaceutical**
 - **FDA now has a softer perspective on enforcement.**

21 CFR Part 11

● Technical Requirements

- **Strong Security** - to ensure the **authenticity**, **integrity**, and **confidentiality** of electronic records.
 - Unique user name/password
 - Limit system access to authorized individuals
 - Detect and report unauthorized use
 - Use of document encryption and digital signature standards
- **Audit Trail**
- **System Availability**
- **Operational System Checks**
- **Electronic Signatures** – to ensure that the signer cannot readily repudiate he signed record.

HIPAA

- **Health Insurance Portability and Accountability Act**
- **Administrative Simplification Act**
 - **Privacy Rule:** “what” individual health information must be protected
 - **Security Rule:** “how” organizations need to protect health-related information
- **Noncompliance would put you in jail.**
- **75% Policies/Procedures, 25% Technology**

HIPAA Security Requirements

- “Ensure the **confidentiality, integrity, and availability** of all electronic protected health information.”
- **Technical Safeguards**
 - **Access Control**
 - Unique user identification
 - Emergency access procedure
 - Automatic logoff
 - Encryption and decryption
 - **Audit**
 - **Integrity**
 - **Authentication**
 - **Transmission Security**
 - Integrity Control
 - Encryption