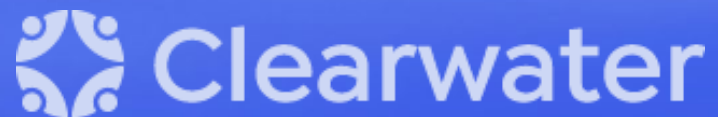


Monthly Cyber Briefing

August 1, 2024



Meeting Logistics



Microphones

All attendees are on mute.



Questions

Type your questions in the Q&A chat box.



Materials

Briefing materials will be provided after event.



Survey

Provide feedback via survey prompt at end of session.

Agenda & Speakers

- Cyber Update
- Preparing for New Cybersecurity Mandates: Insights for Healthcare Organizations



Jon Moore

Chief Risk Officer & SVP Consulting
and Client Success
Clearwater

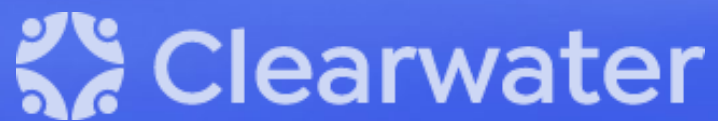


Steve Cagle

Chief Executive Officer
Clearwater

Cyber Update

Steve Cagle



Breach Reports via OCR Breach Portal and Other Reports

OCR Breach Portal Data¹

- 144.4M records reported breached in 2023, an increase of 156% vs 56.5 million in 2022
- 2024 – 46m records from 416 breaches reported vs 414 breaches reported in 2023 same period

Healthcare Records Breached



Notable in OCR Breach Portal

- Includes “placeholder” reports from Change Healthcare (7/19) and Ascension (7/3) – each only listing 500 records – the minimum number that can be reported

Other Reported Breaches (not yet on OCR Portal)

- HealthEquity reported breach of 4.3M records due compromised vendor account with access to a data repository²
- Rite Aid reported 2.2M records, claiming PII bit not ePHI. Attack claimed by RansomHub³

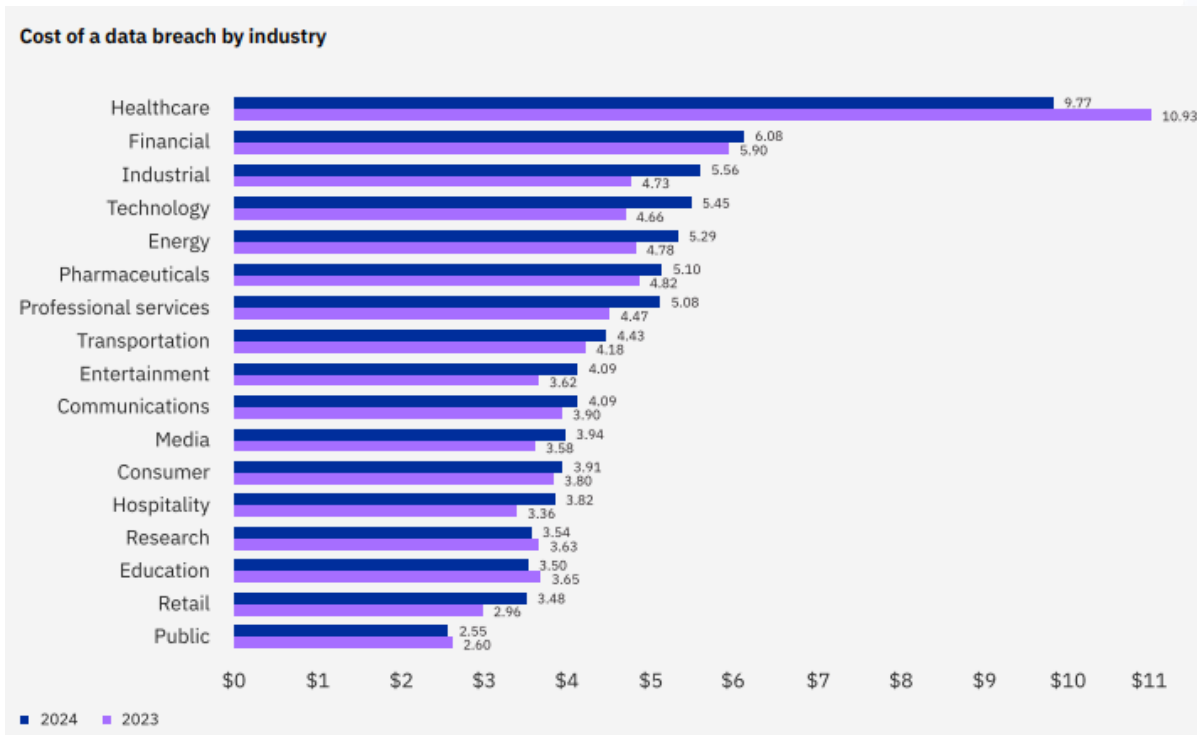
¹ [HHS Breach Portal](#) (2024 data through 7/29/24, pulled on 7/30/24)

² [HealthEquity data breach could affect 4.3M | Healthcare Dive](#)

³ [Rite Aid says June data breach impacts 2.2 million people \(bleepingcomputer.com\)](#)

Annual Cost of Data Breach Report (Ponemon)

Cost of data breach across all industries rose 10% to \$4.9M and in healthcare fell 10% to \$9.8M, however this is still the highest among any industry at \$9.8M and 2X the average cost.



Study period: March 2023 – February 2024

Data Source (IBM/Ponemon): [Cost of a Data Breach Report 2024 \(ibm.com\)](https://www.ibm.com/cybersecurity/resources/cost-of-a-data-breach-report-2024)

Other Findings

- For the 2nd year in a row, stolen or compromised credentials and phishing were the 2 most prevalent attack vectors (combined 31% of attacks)
- Half the breached organizations faced staffing and skills shortage
- 70% of organizations said the breach caused significant or very significant business disruption

Of Note

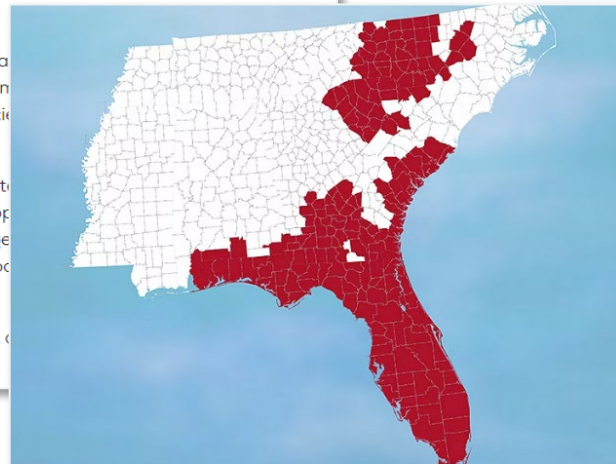
- Study did not include any breaches greater than 113,000 records. Mega data breaches of 1 million+ records treated separately **and saw costs of 9 times the global average.**

Potential Blood Shortage in Southeast due to Cyber Attack

Cyber attackers continue to attack high impact healthcare supply chain targets.



The screenshot shows the OneBlood website with a red banner at the top stating "OneBlood Target of Ransomware Event Urgent Call for Donors Issued". Below the banner, the main heading reads "OneBlood Target of Ransomware Event Blood Community Rallies to Help as Urgent Call for Donors is Issued". The text below explains that OneBlood is a not-for-profit blood center serving the Southeast, currently experiencing a ransomware event that impacts its software systems. It mentions that a comprehensive response is ongoing and that the organization is working to restore systems as quickly as possible. A quote from Susan Forbes, OneBlood's corporate communications and public relations, is included. At the bottom, it states that OneBlood remains operational but is operating at a significantly reduced capacity.



- Affects blood supply for 250 hospitals in Florida, Georgia, and the Carolinas
- OneBlood notified customers on 7/28 of potential shortages and delays
- This may be related to recent Microsoft-reported VMWare ESXi hypervisor [CVE-2024-37085](#) (not confirmed)¹
- H-ISAC Sector alert issued on Tuesday 7/30 of "IT Outage". Reported 7/31 due to cyberattack
- Reverting to manual procedures
- Hospitals advised to activate their critical blood shortage protocols

North Korean Hacker Hired By Cyber Firm KnowBe4

Stolen credentials and an AI Enhanced photo enabled North Korean threat actor to trick HR.

23 How a North Korean Fake IT Worker Tried to Infiltrate Us

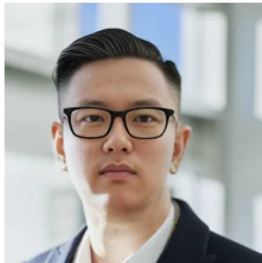
Jul  Stu Sjouerman

 Post  Share  Share 382

Incident Report Summary: Insider Threat

First of all: No illegal access was gained, and no data was lost, compromised, or exfiltrated on any KnowBe4 systems. This is not a data breach notification, there was none. See it as an organizational learning moment I am sharing with you. If it can happen to us, it can happen to almost anyone. Don't let it happen to you.

We wrote an FAQ, answering questions from customers. Story updated 7/27/2024.



TLDR: KnowBe4 needed a software engineer for our internal IT AI team. We posted the job, received resumes, conducted interviews, performed background checks, verified references, and hired the person. We sent them their Mac workstation, and the moment it was received, it immediately started to load malware.

Our HR team conducted four video conference based interviews on separate occasions, confirming the individual matched the photo provided on their application. Additionally, a background check and all other standard pre-hiring checks were performed and came back clear due to the stolen identity being used. This was a real person using a valid but stolen US-based identity. The picture was AI "enhanced".

- Used a valid identity that was stolen from a U.S.-based individual
- Employee passed background checks and verified resources
- Employee likely had his workstation connected “to an address that is basically an ‘IT mule laptop farm’”
- Security Operations Center team detected “a series of suspicious activities” from the new hire when he installed info stealing malware
- No data was stolen prior to removing access

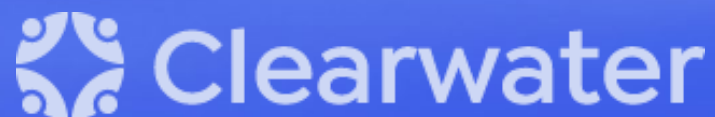
Addressing Current Threat Environment

Specific recommendations related to content in this briefing

- Conduct risk analysis at the information system and component level
- Review security awareness training program, and assess whether more sophisticated testing is required
 - Is the cadence of testing appropriate?
 - How are you dealing with repeat offenders?
 - Are phishing tests customized to your company? Are you including, vishing, smishing?
 - How quickly are you providing training, and testing proficiency with new colleagues?
- Assess HR vetting process for hiring of new colleagues. E.g., personal and professional data consistency checks, reference checks via phone, address validation, on camera requirements
- Limit the amount of data vendors store, as well as their level of access
- Increase monitoring, detection and response capabilities
- Be aware of the TTPs of ransomware threat actors, particularly those that are specifically targeting healthcare and implement recommended mitigation and detection (refer to previous briefings)

Unpacking HHS's Latest Cybersecurity Performance Goals (CPGs)

Jon Moore, JD MS HCISPP



HHS's CPGs Fulfill Goal of HHS Healthcare Sector Cybersecurity Strategy

The Healthcare Sector Cybersecurity strategy provides an overview of HHS' proposed framework to help the healthcare sector address cybersecurity threats and protect patients.

HHS will take the following concurrent steps:

1. **Establish voluntary cybersecurity performance goals for the healthcare sector**
2. Provide resources to incentivize and implement these cybersecurity practices
3. Implement an HHS-wide strategy to support greater enforcement and accountability
4. Expand and mature the one-stop shop within HHS for healthcare sector cybersecurity

"The Healthcare and Public Health Sector-specific Cybersecurity Performance Goals (HPH CPGs) will help healthcare institutions prioritize implementation of high-impact cybersecurity practices. HPH CPGs will include both "essential" goals to outline minimum foundational practices for cybersecurity performance and "enhanced" goals to encourage adoption of more advanced practices."

Source: <https://aspr.hhs.gov/cyber/Documents/Health-Care-Sector-Cybersecurity-Dec2023-508.pdf>

HHS's CPGs Align With Existing Frameworks

“Built off the chassis of CISA’s CPGs and informed by common industry cybersecurity frameworks, guidelines, best practices, and strategies (e.g., Healthcare Industry Cybersecurity Practices, National Institute of Standards and Technology (NIST) Cybersecurity Framework, Healthcare and Public Health Sector Cybersecurity Framework Implementation Guide, and the National Cybersecurity Strategy).”

Mitigate Known Vulnerabilities

Reduce the likelihood of threat actors exploiting known vulnerabilities to breach organizational networks that are directly accessible from the Internet.

HICP Practices:

- Vulnerability Management
- Endpoint Protection

HICP Sub-Practices:

- Host/Server-Based Scanning (7.M.A)
- Web Application Scanning (7.M.B)
- Basic Endpoint Protection (2.M.A)

NIST Controls

CA-2, CA-5, CA-7, CA-8, PM-4, PM-15, RA-3, RA-5, SA-5, SA-11, SI-2, SI-4, SI-5, RA-1, RA-3, RA-5, SI-2, CA-5, PM-4, PM-9, PM-28, RA-7, CA-1, CA-2, RA-1, PM-4, PM-15, RA-7, SI-5, SR-6 AC-1, AC-17, AC-19, AC-20, SC-15

CISA CPG IDs

- Mitigating Known Vulnerabilities (1.E)
- No Exploitable Services on the Internet (2.W)

Additional Resources:

- CISA's Vulnerability Scanning (VS)
- Known Exploited Vulnerabilities Catalog

APPENDIX 1: Essential CPGs

Essential Goals						
ID	Goals	Desired Outcomes (NIST CSF V1.1)	HICP Practices	HICP Sub-Practices	NIST 800-53 RV1 Controls	Threats Mitigated
1	Mitigate Known Vulnerabilities: Reduce the likelihood of threat actors exploiting known vulnerabilities to breach organizational networks that are directly accessible from the Internet.	<p>ID.RA-1: Asset vulnerabilities are identified and documented.</p> <p>PR.IP-13: A vulnerability management plan is developed and implemented.</p> <p>DE.CM-8: Vulnerability scans are performed.</p> <p>RS.MI-3: Newly identified vulnerabilities are mitigated or documented as accepted risks.</p> <p>RS.AM-8: Processes are established to receive, analyze and respond to vulnerabilities disclosed to the organization from internal and external sources (e.g. internal testing, security bulletins, or security researchers).</p> <p>ID.RA-6: Risk responses are identified and prioritized.</p> <p>PR.AC-8: Remote access is managed.</p>	<p>Vulnerability Management</p> <p>Endpoint Protection</p>	<p>Host/Server-Based Scanning 7.M.A</p> <p>Web Application Scanning 7.M.B</p> <p>Basic Endpoint Protection Controls 2.M.A</p>	<p>CA-2, CA-5, CA-7, CA-8, PM-4, PM-15, RA-3, RA-5, SA-5, SA-11, SI-2, SI-4, SI-5</p> <p>RA-1, RA-3, RA-5, SI-2</p> <p>CA-5, PM-4, PM-9, PM-28, RA-7</p> <p>CA-1, CA-2, RA-1, PM-4, PM-15, RA-7, SI-5, SR-6</p> <p>AC-1, AC-17, AC-19, AC-20, SC-15</p>	<p>Ransomware</p> <p>Social engineering</p> <p>Insider threat</p> <p>Attacks on network connected devices</p>
2	Email Security: Reduce risk from common email-based threats, such as email spoofing, phishing, and fraud.	<p>PR.AC-8: Protections against data leaks are implemented.</p> <p>PR.AC-7: Users, devices, and other assets are authenticated (e.g., single-factor, multifactor) commensurate with the risk of the transaction.</p> <p>PR.PT-4: Communications and control networks are protected.</p>	<p>Email Protection Systems</p>	<p>Basic Email Protection Controls 1.M.A</p> <p>Workforce Education 1.M.D</p> <p>Multifactor Authentication for Email Access 1.M.B</p>	<p>MP-2, MP-3, MP-4, MP-5, MP-6, MP-7, MP-8, SC-28</p> <p>SC-8, SC-11</p> <p>AC-4, AC-5, AC-6, AU-13, PE-19, PS-6, SC-7, SI-4</p> <p>AC-12, AC-17, AC-18, CP-8, SC-5, SC-7, SC-10, SC-11, SC-20, SC-21, SC-22, SC-23, SC-31, SC-37, SC-38, SC-47</p> <p>AC-14, IA-1, IA-2, IA-3, IA-5, IA-8, IA-9, IA-10, IA-11</p>	<p>Ransomware or other malware delivered via email, spoofing email attempts</p> <p>Account takeover</p>
3	Multifactor Authentication: Add a critical, additional layer of security, where safe and technically capable, to protect assets and accounts directly accessible from the Internet.	<p>PR.AC-7: Users, devices, and other assets are authenticated (e.g., single-factor, multifactor) commensurate with the risk of the transaction.</p> <p>PR.AC-1: Identities and credentials are issued, managed, verified, revoked, and audited for authorized devices, users and processes.</p>	<p>Identity and Access Management</p>	<p>Identity 3.M.A</p> <p>Authentication 3.M.C</p> <p>Multifactor Authentication for Remote Access 3.M.D</p>	<p>AC-14, IA-1, IA-2, IA-3, IA-5, IA-8, IA-9, IA-10, IA-11</p> <p>IA-1, IA-2, IA-3, IA-4, IA-5, IA-7, IA-8, IA-9, IA-10, IA-11, IA-12</p>	<p>Later movement within an environment</p> <p>Account takeover</p>

Each CPG is mapped to related HICP practices and sub-practices, CISA CPGs, NIST CSF Subcategories, and NIST 800-53 Controls.

Sources:

- <https://www.cisa.gov/cross-sector-cybersecurity-performance-goals>
- <https://hphcyber.hhs.gov/performance-goals.html>
- <https://hphcyber.hhs.gov/documents/cybersecurity-performance-goals.pdf>

HHS's CPGs include Essential and Enhanced Goals

These CPGs are a voluntary subset of cybersecurity practices that healthcare organizations, and healthcare delivery organizations in particular, can prioritize to strengthen cyber preparedness, improve cyber resiliency, and ultimately protect patient health information and safety.

Essential Goals

To help healthcare organizations address common vulnerabilities by setting a **floor of safeguards** that will better protect them from cyber attacks, improve response when events occur, and minimize residual risk.

Enhanced Goals

To help healthcare organizations **mature their cybersecurity capabilities** and reach the next level of defense needed to protect against additional attack vectors.

HHS Provides Goal Statements and Mappings

HHS' Healthcare and Public Health Sector-Specific Cybersecurity Performance Goals document includes statement of the goal and mappings to NIST CSF 1.1, HICP Practices and Sub-Practices, NIST 800-53 Rev 5 and mitigated threats.

Essential Goals						
ID	Goals	Desired Outcomes (NIST CSF V1.1)	HICP Practices	HICP Sub-Practices	NIST 800-53 REV5 Controls	Threats Mitigated
4	Basic Cybersecurity Training: Ensure organizational users learn and perform more secure behaviors	<p>PR.AT-1: All users are informed and trained</p> <p>PR.AT-2: Privileged users understand their roles and responsibilities</p> <p>PR.AT-3: Third party stakeholders (e.g., suppliers, customers, partners) understand their roles and responsibilities</p>	<p>Email Protection Systems</p> <p>Cybersecurity Oversight and Governance</p>	<p>Workforce Education 1.M.D</p> <p>Security Awareness and Training 10.M.C</p>	<p>AT-2, PM-13, PM-14</p> <p>AT-3, PM-13</p>	<p>Ransomware</p> <p>Social engineering</p> <p>Insider threat</p> <p>Attacks on network connected devices</p>

Source: <https://hphcyber.hhs.gov/documents/cybersecurity-performance-goals.pdf>

HHS CPG Essential Goals 1 – 5

Essential Goals	Goal Statement
Mitigate Known Vulnerabilities	Reduce the likelihood of threat actors exploiting known vulnerabilities to breach organizational networks that are directly accessible from the Internet.
Email Security	Reduce risk from common email-based threats, such as email spoofing, phishing, and fraud.
Multifactor Authentication	Add a critical, additional layer of security, where safe and technically capable, to protect assets and accounts directly accessible from the Internet
Basic Cybersecurity Training	Ensure organizational users learn and perform more secure behaviors.
Strong Encryption	Deploy encryption to maintain confidentiality of sensitive data and integrity of Information Technology (IT) and Operational Technology (OT) traffic in motion.

HHS CPG Essential Goals 6 – 10

Essential Goals	Goal Statement
Revoke Credentials	Prevent unauthorized access to organizational accounts or resources by former workforce members, including employees, contractors, affiliates, and volunteers by removing access promptly.
Basic Incident planning and Preparedness	Ensure safe and effective organizational responses to, restoration of, and recovery from significant cybersecurity incidents.
Unique Credentials	Use unique credentials inside organizations' networks to detect anomalous activity and prevent attackers from moving laterally across the organization, particularly between IT and OT networks.
Separating User and Privileged Accounts	Establish secondary accounts to prevent threat actors from accessing privileged or administrative accounts when common user accounts are compromised.
Vendor/Supplier Cybersecurity Requirements	Identify, assess, and mitigate risks associated with third party products and services.

HHS CPG Enhanced Goals 1 - 5

Enhanced Goals	Goal Statement
Asset Inventory	Identify known, unknown (shadow), and unmanaged assets to more rapidly detect and respond to potential risks and vulnerabilities.
Third Party Vulnerability Disclosure	Establish processes to promptly discover and respond to known threats and vulnerabilities in assets provided by vendors and service providers.
Third Party Incident Reporting	Establish processes to promptly discover and respond to known security incidents or breaches across vendors and service providers.
Cybersecurity Testing	Establish processes to promptly discover and responsibly share vulnerabilities in assets discovered through penetration testing and attack simulations.
Cybersecurity Mitigation	Establish processes internally to act quickly on prioritized vulnerabilities discovered through penetration testing and attack simulations.

HHS CPG Enhanced Goals 6 - 10

Enhanced Goals	Goal Statement
How to Respond to Relevant Threats	Ensure organizational awareness of and ability to detect relevant threats and TTPs at endpoints. Ensure organizations are able to secure entry and exit points to its network with endpoint protection.
Network Segmentation	Mission critical assets are separated into discrete network segments to minimize lateral movement by threat actors after initial compromise.
Centralized Log Collection	Collection of necessary telemetry from security log data sources within an organization's network that maximizes visibility, cost effectiveness, and faster response to incidents.
Centralized Incident Planning and Preparedness	Ensure organizations consistently maintain, drill, and update cybersecurity incident response plans for relevant threat scenarios.
Configuration Management	Define secure device and system settings in a consistent manner and maintain them according to established baselines.

The Future for HHS's CPGs

There is currently significant chatter out of Washington that the HHS CPGs will become mandatory for organizations participating in Medicare and Medicaid.

HIPAA Security Rule

It is anticipated that these CPGs will become mandatory through an amendment of the HIPAA Security Rule. It is currently anticipated that amendments to the HIPAA Security Rule, including new cybersecurity requirements, will be implemented in September 2024, but that deadline may be extended.

Promoting Interoperability Program

CMS will also likely propose new cybersecurity requirements for hospitals through Medicare and Medicaid in the form of Medicare or Medicaid conditions of participation or as part of the Medicare Promoting Interoperability Program. It is currently unknown when CMS will begin the rulemaking and comment process for proposed enforceable cybersecurity requirements.

Source: <https://www.jdsupra.com/legalnews/hhs-cybersecurity-performance-goals-and-4688203/>

Biden's FY 2025 Budget Includes Proposed Funding and Penalties

FY 2025

Biden Administration's FY 2025 Budget in Brief, released in March 2024, in which the administration proposed to establish "essential" and "enhanced" incentive structures to encourage hospitals, if applicable, to upgrade their cybersecurity practices. HHS also proposed penalties for certain hospitals that fail to implement "essential" and "enhanced" cybersecurity practice standards.

Source: <https://natlawreview.com/article/hhs-health-care-cybersecurity-performance-goals-proposed-incentives-penalties-and>

FY 2027-28

FY 2027 and FY 2028, HHS would transfer \$800 million from the Medicare Hospital Insurance Trust Fund to approximately 2,000 high-needs hospitals that would be used to implement "essential" cybersecurity practice standards. In connection with hospitals' participation in the Promoting Interoperability Program, acute care hospitals that do not adopt essential cybersecurity practices would be responsible for penalties.

FY 2029-30

During FY 2029 and FY 2030, HHS would transfer \$500 million from the Medicare Hospital Insurance Trust Fund to all hospitals to implement "enhanced" cybersecurity practices. CMS has the opportunity to transition the "enhanced" cybersecurity practice standards to being required under the Promoting Interoperability Program as of FY 2031, and hospitals that do not adopt CMS-chosen enhanced cybersecurity practices would be responsible for penalties.

Small Organizations Will Need to Do More to Achieve the CPGs

The CPGs align to primarily the Health Industry Cybersecurity Practices recommended for Medium and, in some cases, Large organizations.

Essential CPG	HICP Reference	Enhanced CPG	HICP Reference
Mitigate Known Vulnerabilities	7.M.A, 7.M.B, 2.M.A	Asset Inventory	5.M.A, 5.M.B, 5.M.C, 7.M.C
Email Security	1.M.A, 1.M.D, 1.M.B	Third Party Vulnerability Disclosure	10.M.B
Multifactor Authentication	3.M.A, 3.M.C, 3.M.D	Third Party Incident Reporting	10.M.B, 7.M.D, 8.M.C
Basic Cybersecurity Training	1.M.D, 10.M.C	Cybersecurity Testing	7.L.A, 7.L.C, 8.M.C
Strong Encryption	1.M.C, 2.M.A, 4.M.C	Cybersecurity Mitigation	8.M.C, 7.M.D, 7.L.B
Revoke Credentials for Departing Workforce Members, Including Employees, Contractors, Affiliates, and Volunteers	3.M.B, 3.M.C	Detect and Respond to Relevant Threats and Tactics, Techniques, and Procedures	2.L.C
Basic Incident Planning and Preparedness	8.M.B, 10.M.A, 4.M.D	Network Segmentation	6.M.B
Unique Credentials	3.M.A, 3.M.B, 3.M.C, 3.M.D	Centralized log Collection	8.M.A, 8.M.B
Separate User and Privileged Accounts	3.M.A, 3.M.B, 3.M.C, 3.M.D	Centralized Incident Planning and Preparedness	8.M.A, 8.M.B
Vendor/Supplier Cybersecurity Requirements	10.M.B	Configuration Management	7.M.D

Raises the Question of What Achieving a Goal Means and What Might be Required to Demonstrate It

If the Cybersecurity Performance Goals become something more than voluntary for at least a portion of the healthcare industry, how will they be enforced, by whom, and what will be required to demonstrate achievement of each goal?

Enforcement

- Will they be enforced by OCR as part of HIPAA and if so, will it only be because of an audit or investigation?
- Will the HIPAA Audit protocol also receive an update?
- If part of Promoting Interoperability will CMS require an attestation similar to what they do with Risk Analysis?
- HHS Strategy calls for greater enforcement and accountability.

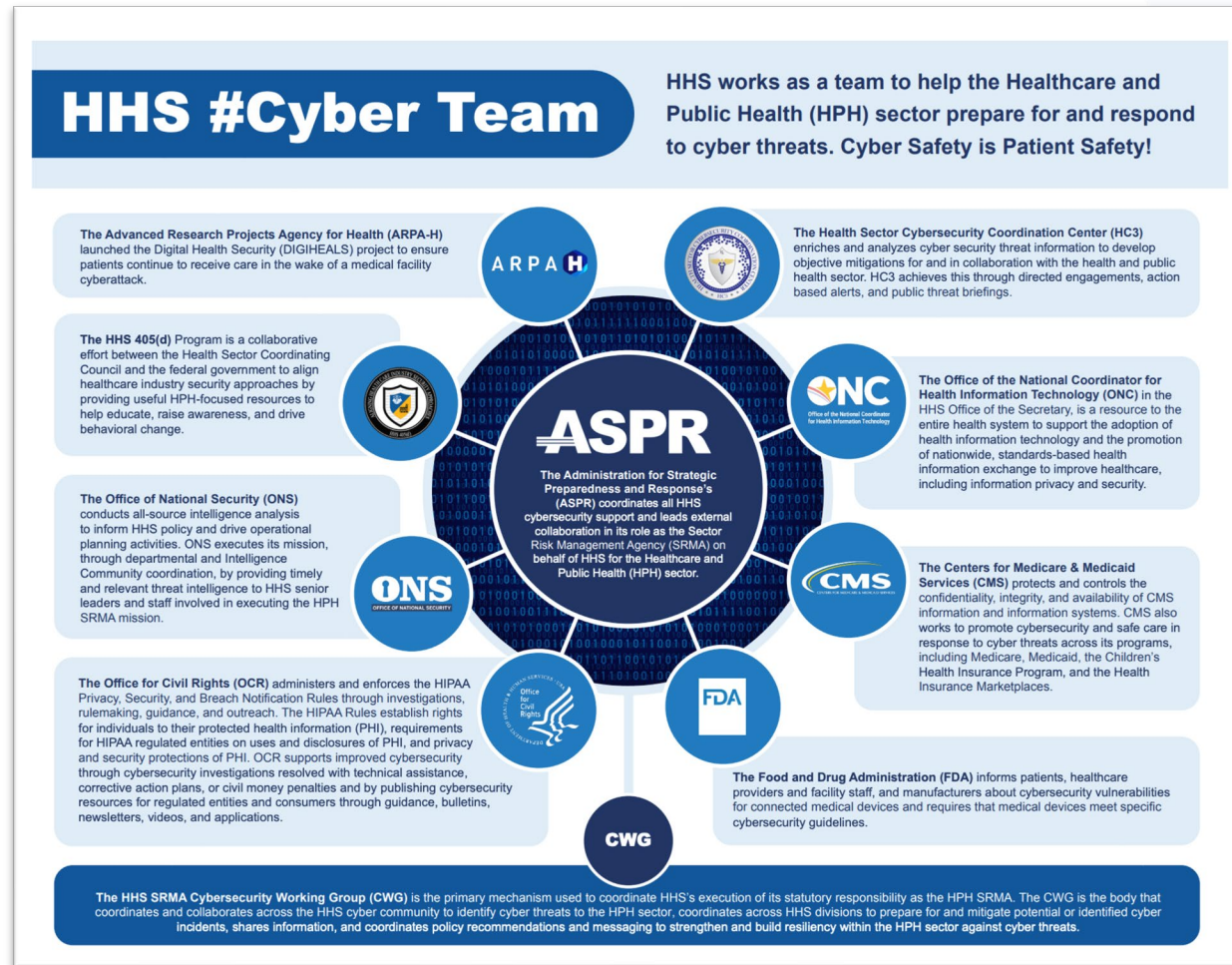
Compliance

- What evidence can and should be provided to demonstrate goal achieved?
- Will it be the same for all organizations regardless of size and segment?
- How will small healthcare organizations fund be coming compliant?
- HHS Strategy calls for resources to incentivize implementation of cybersecurity practices.

Penalties

- Will the proposed penalties see adoption?
- What about requirements for business associates?
- Will the CPGs be irrelevant by the time they are required?

The Federal Healthcare Cybersecurity Ecosystem is Growing



The Federal Healthcare Cybersecurity Ecosystem is growing quickly and extends well beyond the requirements of HIPAA and enforcement from OCR.

Source: <https://aspr.hhs.gov/cyber/Documents/Health-Care-Sector-Cybersecurity-Dec2023-508.pdf>



Q&A



Upcoming Webinars



**OCR-Quality® Risk Analysis
Working Lab 2024: Beginning
August 7th @ 11:00 am CT**

[Register here](#)



**Making the Move to Proactive
Patient Privacy Monitoring |
September 10 @ 12:00 CST**

[Register here](#)



**OCR-Quality® Risk Response
Working Lab 2024: Beginning
September 18th @ 11:00am CT**

[Register here](#)

Upcoming Industry Events



SCCE Compliance Auditing & Monitoring Conference | September 17, 2024



Healthtech Leader 3.0 | September 18-20, 2024



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