

# April 20 2022 Regular Board Meeting

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# **AGENDA**

## **NORTHERN INYO HEALTHCARE DISTRICT BOARD OF DIRECTORS REGULAR MEETING**

**April 20, 2022 at 5:30 p.m.**

Northern Inyo Healthcare District invites you to join this meeting:

**TO CONNECT VIA ZOOM:** *(A link is also available on the NIHD Website)*  
<https://zoom.us/j/213497015?pwd=TDIiWXRuWjE4T1Y2YVFWbnF2aGk5UT09>  
Meeting ID: 213 497 015  
Password: 608092

**PHONE CONNECTION:**  
888 475 4499 US Toll-free  
877 853 5257 US Toll-free  
Meeting ID: 213 497 015

The Board is again meeting in person at 2957 Birch Street Bishop, CA 93514. Members of the public will be allowed to attend in person or via zoom. Public comments can be made in person or via zoom:

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1. Call to Order (at 5:30 pm).
2. **Public Comment:** The purpose of public comment is to allow members of the public to address the Board of Directors. Public comments shall be received at the beginning of the meeting and are limited to three (3) minutes per speaker, with a total time limit of thirty (30) minutes for all public comment unless otherwise modified by the Chair. Speaking time may not be granted and/or loaned to another individual for purposes of extending available speaking time unless arrangements have been made in advance for a large group of speakers to have a spokesperson speak on their behalf. Comments must be kept brief and non-repetitive. The general Public Comment portion of the meeting allows the public to address any item within the jurisdiction of the Board of Directors on matters not appearing on the agenda. Public comments on agenda items should be made at the time each item is considered.
3. New Business:
  - A. Presentation by Stern Security *(Board will receive this presentation)*
  - B. Presentation by Eastern Sierra Cancer Alliance *(Board will receive this presentation)*

- C. Northern Inyo Healthcare District Benefit Highlights Presentation (*Board will receive this presentation*)
  - D. Approval of the District Board Resolution, 22-05 Nondesignated Public Hospital Bridge Loan Program (*Board will consider the adoption of this District Board Resolution*)
  - E. Approval of the Replacement of the Heating and Air Conditioning Units 1967 Building \$80,000.00 (*Board will consider the approval to replace the heating and air conditioning unit 1967 building for \$80,000.00*)
  - F. Northern Inyo Healthcare District 2022 Community Health Needs Assessment CHNA Update (*Board will receive this update*)
  - G. Northern Inyo Healthcare District Radiology Services Update (*Board will received this update*)
  - H. Northern Inyo Healthcare District Workforce Housing Update (*Board will receive this update*)
  - I. Northern Inyo Healthcare District (NIHD) Governance Committee update and discussion of the NIHD Board of Directors Standing Committees (*Board will receive a this update and consider having this discussion*)
4. Chief of Staff Report, Sierra Bourne MD:
- A. Proposed Amendments to Medical Staff Bylaws (*Board will consider the approval to amend these bylaws*)
    - 1. The Active Medical Staff of Northern Inyo Healthcare District has approved the enclosed amendments to the current Medical Staff Bylaws by written ballot and is requesting the Northern Inyo Healthcare District Board of Directors review and consider these amendments for approval. Provided for the Board of Directors review is a document titled “Summary of the Proposed Changes,” which provides a high-level overview of the amendments with page citations. Additionally, the full Medical Staff Bylaws text with marked revisions is also included.
  - B. Policies (*Board will consider the approval of these policies*)
    - 1. *Naloxone (Narcan) Distribution*
    - 2. *Stress Echocardiogram*
    - 3. *Surgery Tissue/Bone Graft “Look Back” Policy*
    - 4. *Interdisciplinary Team – Clinical Screens Built into the Initial Nursing Assessment*
    - 5. *Emergency Management Plan*
  - C. Medical Executive Committee Meeting Report (*Board will receive this information*)

***Consent Agenda***

5. Approval of District Board Resolution 22-06, to continue to allow Board meetings to be held virtually (*Board will consider the adoption of this District Board Resolution*)
6. Approval of minutes of the March 16, 2022 Regular Board Meeting (*Board will consider the approval of these minutes*)
7. Financial and Statistical reports as of February 28, 2022 (*Board will consider accepting this report*)
8. Approval of Policies and Procedures (*Board will consider the approval of these Policies and Procedures*)
  - A. Forms Development and Control Policy
  - B. Nondiscriminatory Policy
  - C. Overtime
  - D. Smoking/Tobacco Policy
  - E. Standby/Callback
  - F. Unusual Occurrence Reporting
  - G. Paid Time Off
9. Approval of the Northern Inyo Healthcare District Rural Health Clinic- Policies and Procedures & Addendums to the Policies (*Board will consider the approval of these Policies and Procedures & Addendums to the Policies*)
  - A. Policies and Procedures
    1. *Regulatory Compliance Policy*
    2. *Formal Corporate or Organization Compliance Plan Policy*
    3. *Organizational Structure and Ownership*
    4. *Organizational Chart Policy*
    5. *Non-Discriminatory Policy*
    6. *RHC Service Area (Location)*
    7. *Advertising, Web-Presence and Social Media Representation*
    8. *Physical Plant Safety: General Policy*
    9. *Preventive and Required Maintenance*
    10. *Building Sanitation and Cleanliness*
    11. *Storage, Handling & Administration of Drugs, Biologicals, and Pharmaceuticals*

12. *Blood Borne Pathogens: Exposure Control (Including Needle Sticks)*
13. *Infection Control Policy*
14. *Disinfection and Sterilization Policy*
15. *Accidental Needle Sticks*
16. *Medical Waste Handling and Disposal*
17. *Hazardous Materials*
18. *Smoke-Free Workplace*
19. *Fire Safety, Training and Evacuation*
20. *Severe Weather and External Disaster Policy*
21. *Communication During Internal or External Situations*
22. *Visitor Policy*
23. *Animals and Pet Policy*
24. *RHC Provision of Services*
25. *Medical Management Guidelines*
26. *Patient-Provided or 3<sup>rd</sup> Party Pharmaceuticals*
27. *Referral Policy*
28. *Transitional Care and Continuity of Care Management*
29. *Missed Appointments*
30. *Emergency Care and Treatment*
31. *Discharging/Dismissing a Patient*
32. *After Hours Care*
33. *Medical Records Policy*
34. *Medical Records Integration Policy*
35. *Health Information Technology/IT*
36. *General Employment Policies*
37. *Credentialing and Employment Policy*
38. *COVID-19 Vaccination Policy*
39. *Periodic Performance Evaluation and Clinical Competency*
40. *Program Evaluation Policy*
41. *Quality Assurance and Utilization Review*
42. *Grievance Policy*
43. *Risk Management Policy*

44. *Financial Policies*

B. Addendums to the Policies

1. *Non-Discriminatory Policy- Policy Addendum: Processes and Procedures*
2. *Disinfection and Sterilization Policy- Addendum Policy*
3. *Communication During Internal or External Situations- Addendum Policy*
4. *Medical Management Guidelines- Policy Addendum: Processes and Procedures*
5. *Patient-Provided or 3<sup>rd</sup> Party Pharmaceuticals- Policy Addendum: Processes and Procedures*

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10. Reports from Board members (*Board will provide this information*).

11. Adjournment

*In compliance with the Americans with Disabilities Act, if you require special accommodations to participate in a District Board meeting, please contact administration at (760) 873-2838 at least 48 hours prior to the meeting.*

**NORTHERN INYO HEALTHCARE DISTRICT  
REPORT TO THE BOARD OF DIRECTORS  
FOR INFORMATION**

Date: 3/31/2022

Title: **ANNUAL SECURITY & PENETRATION RESULTS AND FINDINGS.**

Synopsis: This report is the results of our yearly **ANNUAL SECURITY & PENETRATION TESTING / RETESTING**. This testing is required to meet certain areas of compliance.

**What is Penetration testing?** (Pen testing) is a security exercise where a cybersecurity expert (Stern Security) attempts to find and exploit vulnerabilities in our network or computer systems. The purpose of this was to simulate an attack to identify any weak spots in our system's defenses which attackers could take advantage of and exploit our users or patients.

Prepared by: Bryan Harper - ITS Director | CISO

Approved by: *Kelli Davis*  
Kelli Davis, Chief Executive Officer





**NORTHERN INYO HEALTHCARE DISTRICT**  
*One Team. One Goal. Your Health.*

# 2021 Penetration Test Executive Summary Report

Northern Inyo Healthcare

Assigned Stern Security Team:

Jon Sternstein

Peter Nelson

Kyle Malicoate

Report Date: 12/6/21

Engagement # P210820001



**Information contained in this report is considered confidential**

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## About Stern Security

Stern Security is a cyber security company headquartered in Raleigh, NC dedicated to customer service and improving the long-term security posture of organizations. Our workforce holds major data security certifications, have won security awards and security competitions, taught security classes, and continuously present at security conferences. Stern Security was a finalist for the 2019 NC TECH Cyber Security Award for the Velocity product and a finalist for the 2018 NC TECH Analytics Award for the Healthcare Breaches Executive Dashboard.

We are deeply involved in the security community. We are members of several groups including ISSA, NCHICA, ISC2, and BSides RDU. Our founder and CEO, Jon Sternstein was the former Security Officer at a large healthcare organization and is the co-author of Security Penetration Testing (The Art of Hacking Series) published by Cisco Press.

Giving Back – At Stern Security, we strongly believe in giving back to the community. A portion of all sales go back into building stronger communities through education and affordable housing programs. Since 2019, we have provided educational resources for 90 youths to become proficient developers and have donated funds that provided thousands of nutritious meals to those in need. Some of our programs that we contribute to include: Tweens & Technology, Bowling for Autism, Habitat for Humanity, and the Food Bank.

## EXECUTIVE SUMMARY

Cyber-attacks are an everyday occurrence for companies across all industries. Stern Security performed the following penetration test on Northern Inyo Healthcare in October and November of 2021. The purpose of the penetration test was to determine the security posture of the organization and discover potential vulnerabilities. Through the penetration test, Stern Security's data security team emulated real world attacks to test the organization's defenses and make staff aware of vulnerabilities before adversaries find them.

There are some good security measures in place at Northern Inyo Healthcare. Solutions such as admin account usage alerts, decoy systems, and Security Information Event Management (SIEM) systems, are more common in much larger organizations with full security teams. There were no discovered exploitable systems on the external network so the most likely attack avenues from the internet are phishing and malware. Implementing 2-factor authentication over the past year greatly increased the external security posture. Some of the top positive security measures include:

1. Proactive Penetration Test
2. 2-factor Authentication on External Portals
3. Security Awareness Training
4. No Exploitable External Systems Discovered
5. Alerting on Admin Account Usage
6. Log Reviews

While there are great security measures in place, security can always be improved, and Stern Security was able to discover high risk vulnerabilities. Stern Security was able to compromise the entire organization through outdated and unpatched internal servers. Some of these unpatched systems are unsupported by Microsoft and need to be either upgraded or decommissioned as they are a high risk of compromise and of ransomware attacks.

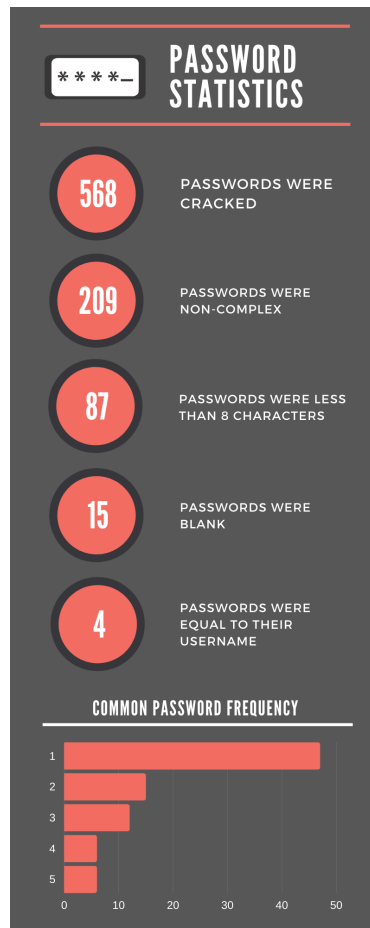
The top vulnerabilities include:

1. Exploitable Systems
2. No Guest Wireless Segmentation (FIXED)
3. Unsupported Systems
4. Unauthenticated Access to PACS
5. Weak Passwords
6. Lenient Access to Sensitive Data

Overall, Northern Inyo Healthcare has a number good security measures in place, but will need to remediate the discovered vulnerabilities to reduce risk. There were no exploitable systems on the external network so the most likely attack avenues from the internet are phishing and malware. Implementing 2-factor authentication over the past year has greatly increased the external security posture. Multiple vulnerabilities that Stern Security discovered pose a high risk to the organization and their remediation efforts should be prioritized. Stern Security has several recommendations to increase the security posture of the organization. Patching or decommissioning exploitable systems, adding authentication to PACS, reviewing network share permissions, and increasing password strength will go a long way to increasing the security posture of the organization.

### Password Statistics

As passwords were one of the top issues, Stern Security performed a deeper dive into the passwords utilized across the organization.





## **Risk!**

Performing a penetration test was imperative to determine the security posture of the Northern Inyo Healthcare, view the environment from the eyes of an attacker, give recommendations to the organization on how to increase their security, and help the Northern Inyo Healthcare protect its data. Penetration testing is becoming increasingly critical, as all sensitive data is available in electronic format.

According to the 2019 Ponemon Institute benchmark study, the average cost of a data breach was \$429 per compromised account across in the healthcare industry.

Cost of a Data Breach by industry (Ponemon Institute, 2019)



















































































































































































































































































































































































































































































































































































































































































































































































