SCCE CEI 2018

4th Party Vendor Management:
How to Manage Your Vendor's Vendor

Take Home
Resources & Tools

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4th Party Subcontractor Additional Resources

Financial Services

Below are links to two Office of the Comptroller of the Currency ("OCC") documents that address 3rd and 4th Party Risk Management. The OCC is a major bank regulator and examiner.

Both documents are quite detailed and address multiple aspects of an effective program.

OCC Bulletin 2013-29 – "Third Party Relationships: Risk Management Guidance" - https://www.occ.gov/news-issuances/bulletins/2013/bulletin-2013-29.html

OCC Bulletin 2017-7 – "Third Party Relationships: Supplemental Examination Procedures" - https://www.occ.gov/news-issuances/bulletins/2017/bulletin-2017-7.html

Healthcare

Health and Human Services Office for Civil Rights ("OCR") Website – https://www.hhs.gov/ocr/index.html

On January 25, 2013, OCR published on its website "SAMPLE BUSINESS ASSOCIATE AGREEMENT PROVISIONS" - https://www.hhs.gov/hipaa/for-professionals/covered-entities/sample-business-associate-agreement-provisions/index.html. Every Subcontractor that has PHI or ePHI is also a Business Associate, and therefore must have a BAA.

OCR Business Associate Information Gathering Template - https://www.hhs.gov/hipaa/for-professionals/compliance-enforcement/audit/batemplate/index.html

OCR Audit Protocol - https://www.hhs.gov/hipaa/for-professionals/compliance-enforcement/audit/protocol/index.html

OCR Security Rule and Risk Analysis Guidance Resources - https://www.hhs.gov/hipaa/for-professionals/security/index.html

4th Party Subcontractor Word Search

There are 76 words in this puzzle that have a relation to 4th Party Subcontractors

Some of the words are two words without a space between them such as "SECURITYRULE". When you find a word, look on both sides of it to see if there is an additional word.

There are 2 words that refer to Outer Space. One is a joke. Be the first to find them and win a prize at the presentation

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T E N G S A N M D S E N R S S T O A G R C R Y D T Q T Q A S
R L O N N S O A I E D O E E T N W U N I E I T T N A R P V E
A U I I O S I R S S O I S R N E S D I S S S I R E L A Q A I
D R T R I E T G C U C T I U E M L I R K L K U A M S N K I T
E Y A O T S N O L D R P L D M S E T O R A R N P E M S K L R
S C T T A S E R O E E Y I E S S W R T A C A I E G P L R A A
E A S I L M T P S T I R E C S E E I I T I T T R A E A E B P
C V E N U E E R U T L C N O E S J G N I S I N A N E T T I H
R I T O G N R O R I P N C R S S N H O N Y N O C A R I U L T
E R T M E T S D E M P E E P S A W T M G H G C I M C O R I F
T P A G R P D N S R U D O S A E O S U S P S S D T N N N T I
S B N O P C R E Y E S D L N D R R G E H T G S E E O S O Y F
M F A L I I O V P P Z O D N E E C L I N N I E M S I N F I U
H U A C I O C E I U R W A I R Z U P E I K S N Z S S Y D J A
T H D V K T E F Z T K L J W A R A D D R A O I E A S D A J E
A N A N Z G R Y N C P C O M H A I N X L D B S O O I V T F P
R A E F E V R O J N V R A L S C U S T A F F U U U M A A W D
B E L M A D C O O Z C J A B N F D E N I E D B S E G N A H C
N G C N E S D I U S D V J I D A T A M I N I M I Z A T I O N
Y O L O S G T A E N O J Y M I N I M U M N E C E S S A R Y A
B Z I E R I A E Y R D T D I S A S T E R R E C O V E R Y A G
Q R C T S D R N P T I C H U B B L E T E L E S C O P E Z U E
S C U N A A K P A R I P H Y T I L A I T N E D I F N O C P N
A U A N W N A E U M E R D E N O I T C U R T S E D A T A D T
F R B T O R I C E R K U U L C S W E I V E R C I D O I R E P
T G F I O M E M S P O S A C P K S N O I T A C I F I T R E C
R O V I N S A O R L I W I H E V S D A T A O W N E R S H I P
S A R S V M N R C E S N I R A S Y R O T N E V N I A T A D U
L P T V I S O U S V T Y G S E C U R I T Y R U L E N I S T O
C O S I M U D N E D D A Y C A V I R P N I T E L L U B C C O
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4ᵗʰ Party Subcontractor Word Search – Words Solution

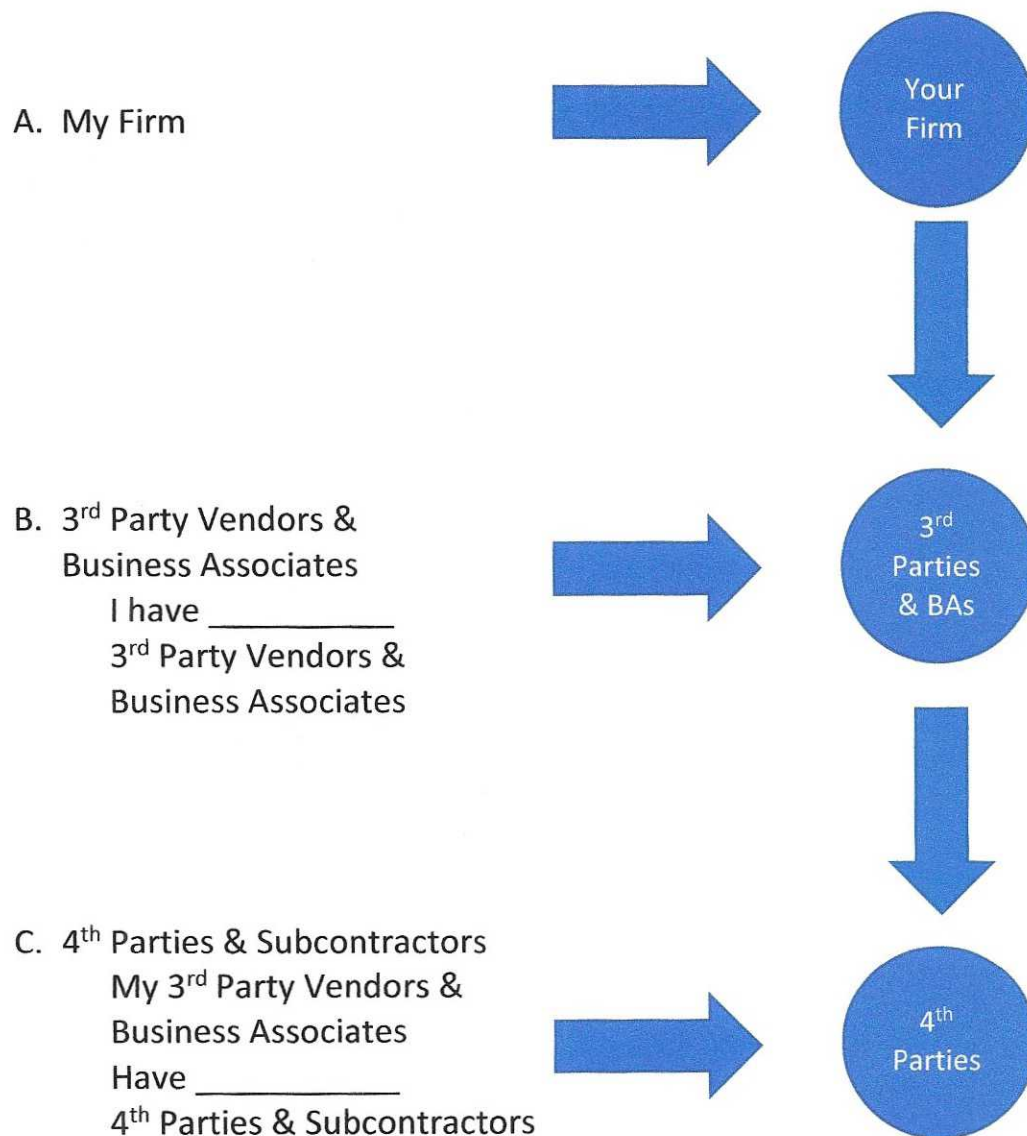| (Over,Down,Direction)	(Over,Down,Direction)
ACCESSCONTROLS (1,24,NE)	NIST (26,29,E)
AGENT (30,20,S)	OCCBULLETIN (30,30,W)
ASSESSMENT (6,1,S)	OMNIBUS (7,29,NW)
ASSETMANAGEMENT (25,15,N)	PCI (6,11,S)
ATTESTATION (3,11,N)	PERIODICREVIEWS (30,25,W)
AUDITRIGHTS (18,1,S)	PERMITTEDUSES (10,13,N)
AUP (29,21,S)	PERSONS (12,23,SW)
AVAILABILITY (29,1,S)	PHI (15,26,SW)
BAA (1,18,NE)	PHYSICALSEC (21,11,N)
BACKGROUNDCHECKS (2,12,SE)	PII (5,12,S)
BACKUP (14,18,NW)	PRIORAPPROVAL (2,29,NE)
BRUNOMARS (1,21,SE)	PRIVACYADDENDUM (19,30,W)
BUSINESSCONTINUITY (23,18,N)	PRIVACYRULE (2,11,N)
CERTIFICATIONS (30,26,W)	PROCEDURES (14,10,N)
CHANGES (30,18,W)	REASSESSMENT (16,12,N)
CLOUD (9,28,NE)	RECORDKEEPING (1,17,SE)
CONFIDENTIALITY (28,23,W)	RECORDSRETENTION (7,16,N)
CROWNJEWELS (17,13,N)	REGULATIONS (5,11,N)
DATADESTRUCTION (29,24,W)	RESILIENCE (13,1,S)
DATAINVENTORY (29,28,W)	RETURNOFDATA (28,6,S)
DATAMINIMIZATION (15,19,E)	RISKMANAGEMENT (14,28,NW)
DATAOWNERSHIP (18,27,E)	RISKRATING (22,1,S)
DENIED (17,18,E)	RISKRATINGS (20,1,S)
DISASTERRECOVERY (13,21,E)	RULE (16,15,NE)
DISCLOSURE (9,1,S)	SECURITYADDENDUM (16,28,NW)
ENCRYPTION (12,10,N)	SECURITYINCIDENTS (6,27,NE)
FIFTHPARTIES (30,12,N)	SECURITYRULE (14,29,E)
FUNDING (16,18,NE)	SHAREDASSESSMENTS (15,17,N)
HIPAA (20,12,SW)	SLA (26,4,N)
HUBBLETELESCOPE (13,22,E)	SOC (3,30,W)
ISO (22,13,S)	SOFTWAREESCROW (1,28,NE)
ITAR (4,30,NW)	STAFF (18,17,E)
LAWS (14,25,SW)	SUPPLIERCODE (11,12,N)
LOGMONITORING (4,13,N)	TERMINATION (11,29,NW)
MEDICAREPARTD (24,13,N)	TRADESECRETS (1,1,S)
MINIMUMNECESSARY (14,20,E)	TRANSITIONPLAN (1,26,NE)
MISSIONCREEP (26,17,N)	TRANSLATIONS (27,1,S)
MONITORING (19,10,N)	VENDORPROGRAM (8,13,N)

4th Party / Subcontractor Data Breach

1) Multiple Choice Question

- If Your 4th Party / Subcontractor Breaches Your Data, PII, PHI, or ePHI, Who Has the Problem?

    a) - You

    b) - Your 3rd Party / Business Associate

    c) - Your 4th Party / Subcontractor

    d) – a & b

    e) – a & c

    f) – b & c

    g) All of the above

    h) It depends

2) Discussion Question

- What is the Nature / Implication / Consequences of the 4th Party / Subcontractor Breach?

How Many 4th Party Subcontractors Have Access or Potential Access to My PII, PHI, Personal Data, & Other Target Data?

A. My Firm

Your Firm

B. 3rd Party Vendors &
   Business Associates
       I have _____
       3rd Party Vendors &
       Business Associates

3rd Parties & BAs

C. 4th Parties & Subcontractors
       My 3rd Party Vendors &
       Business Associates
       Have _____
       4th Parties & Subcontractors

4th Parties

Answer: B X C = Total Number of 4th Parties & Subcontractors

_____ X _____ = _____

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4ᵗʰ Party Vendor Risk Management Worksheets

Action	Effectiveness	Cost / Resources	Ease of Implementation
	High	Low	Easy
	Medium	Medium	Difficult
	Low	High	Very Difficult

Notes:

Action	Effectiveness	Cost / Resources	Ease of Implementation
	High	Low	Easy
	Medium	Medium	Difficult
	Low	High	Very Difficult

Notes:

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