

The Framing

# This isn't a ~~refresh~~. It's a forensic document.

# 240

Days to Comply

Each mandated control maps to a named 2024 breach failure mode. **MFA answers Change Healthcare. Segmentation answers Ascension.** "Addressable" ends after 12 years.

60 effective + 180 compliance. Target: May 2026.

Part 1 · The 240-day plan

## Your prescription

- 01 Commission a NIST SP 800-30 risk analysis**  
NOW · HIGHEST-ROI CONTROL  
 Written threat-vulnerability pairs with likelihood, impact, residual risk. Cited in nearly every OCR enforcement since Oct 2024.
- 02 Audit every MFA access point**  
30 DAYS  
 Remote, VPN, Citrix, RDP, admin consoles. Phishing-resistant preferred. Document legacy exceptions.
- 03 Build a living asset & network map**  
60 DAYS  
 Dynamic, annually reviewed, exportable. Every asset touching ePHI with version, owner, location.
- 04 Pick a segmentation path that fits 240 days**  
90 DAYS · CRITICAL DECISION  
 Legacy NAC = 12–24 months. Identity-based microsegmentation deploys on existing switches in days.

The Elisity Answer

# 14 / 40

## One platform. The hardest mandates, delivered.

Collapses asset inventory, network map, microseg, identity policy, and audit evidence **on switches you already own.** Agentless. Days.

- Microseg
- IdentityGraph
- Identity policy
- IR / Audit

- #31 #32 #36
- #01 #02 #34
- #24 #29 #30
- #10 #12 #27

### The 40 NPRM controls · full map

Direct 14  Integrated 8  Other 18

01 Asset Inv	02 Net Map	03 Risk Anly	04 Compl Aud	05 Sec Off	06 Access Dt	07 1hr Term	08 24hr Nfy	09 Sanction	10 Act Rev
11 Awareness	12 Incident	13 Conting	14 Backup	15 BA Verify	16 BA Contin	17 Patch	18 Vuln Scan	19 Pen Test	20 Facility
21 Wrkst Use	22 Wrkst Sec	23 Media	24 Access	25 Encrypt	26 MFA	27 Audit Log	28 Integrity	29 Ent Auth	30 Transmit
31 Config	32 Segment★	33 AntiMalw	34 Monitor	35 Sys Backup	36 BA Segm	37 Grp Plans	38 Policies	39 Emerging	40 Definitions

Bottom Line

Legacy NAC: 12–24 months. Elisity: **hours to days.** Main Line Health · 100K+ devices · MTTR 10 min.

Book a 30-min briefing →