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North Sound Behavioral Health Administrative Services Organization, LLC

Section 4000 - Information Systems: Information Systems Policy & Procedures

Authorizing Source: HCA Contract

Approved by: Executive Director

Date: 9/10/2024

Signature:

POLICY #4001.00

SUBJECT: INFORMATION TECHNOLOGY (IT) POLICIES & PROCEDURES

PURPOSE

This, and all other North Sound Behavioral Health Administrative Services Organization (BH-ASO) IT security policies and directives have been established to:

1. Assure consumer confidentiality.
2. Protect the investment of human and financial resources in the creation of North Sound Behavioral Health Administrative Services Organization (North Sound BH-ASO) IS/IT systems.
3. Safeguard the information contained within these systems.
4. Reduce business and legal risk.
5. Identify IT responsibilities within the North Sound BH-ASO.
6. Outline organization wide IT requirements.
7. Protect the good name of the North Sound BH-ASO.
8. Assure orderly and efficient operations.

RESPONSIBILITY

General responsibilities pertaining to this policy are set forth in this section. The following sections list additional specific responsibilities.

Manager Responsibilities

1. Ensure that all appropriate personnel are aware of and comply with this, and all security policies.
2. Create appropriate performance standards, control practices, and procedures designed to provide reasonable assurance that all employees observe all IT and security policies.

IT Staff Responsibilities

1. Develop and maintain written standards and procedures necessary to ensure implementation of and compliance with these policy directives.
2. Provide appropriate support and guidance to assist employees to fulfill their responsibilities under this directive.

INTERNET AND EMAIL POLICY

The Internet is a very large, publicly accessible network, with millions of connected users and organizations worldwide. One popular feature of the internet is email. For more specific information regarding email, see North Sound BH-ASO Policy 4005.00 *Email and Internet Security*.

Access to the Internet is provided to employees for the benefit of the North Sound BH-ASO and its consumers. Employees can connect to a variety of business information resources around the world, communicate with stakeholders, and inform the public. Conversely the Internet is also replete with risks and inappropriate material. To ensure that all employees are responsible and productive internet users and to protect the North Sound BH-ASO's interests, the following guidelines have been established:

Acceptable Use

Employees using the Internet are representing the North Sound BH-ASO, and are responsible for using the Internet in an effective, ethical, and lawful manner, such as:

1. Using Web browsers to obtain business information from commercial Web sites.
2. Accessing databases for information as needed.
3. Using email for North Sound BH-ASO business contacts.

Unacceptable Use

Employees may not use the Internet for purposes that are illegal, unethical, harmful to the North Sound BH-ASO, or nonproductive. While using North Sound BH-ASO resources, Internet and email shall not be used for employee personal gain or to support other activities unrelated to North Sound BH-ASO business, such as:

1. Sending or forwarding chain e-mail, i.e., messages containing instructions to forward the message to others.
2. Conducting personal business using North Sound BH-ASO resources.
3. Transmitting any content that is a solicitation of funds, contains political messages, is offensive, harassing, or fraudulent.

Downloads

File downloads from the internet are not permitted unless authorized and specifically for use in normal work activities.

Employee Responsibilities

1. Ensure that all communications are for professional reasons and that they do not interfere with productivity.
2. Be responsible for all data (text, audio, images, etc.) they place on or send over the Internet. All communications shall have the employee's name attached.
3. Not transmit copyrighted materials without permission.
4. Know and abide by all applicable North Sound BH-ASO policies dealing with security and confidentiality of all North Sound BH-ASO records, data and devices.
5. Run a virus scan on any executable files, zip files or documents received through the Internet.
6. Avoid transmission of confidential consumer information. If it is necessary to transmit confidential information, the use of FIPS 140-3 Level 1 compliant encryption at a minimum is required to ensure that information is securely delivered to the individuals authorized to receive such information for a legitimate use.

COPYRIGHTS

Employees using the Internet are not permitted to copy, transfer, rename, add, or delete information or programs belonging to others unless given express permission to do so by the owner. Failure to observe copyright or license agreements may result in disciplinary action by the North Sound BH-ASO and/or legal action by the copyright owner.

MONITORING

All messages created, sent, or retrieved over the Internet are the property of the North Sound BH-ASO and may be regarded as public information. North Sound BH-ASO reserves the right to access the contents of any message sent over its facilities if North Sound BH-ASO believes, in its sole judgment, that it has a business need to do so.

All communications, including text and images, can be disclosed to law enforcement or other third parties without prior consent of the sender or the receiver. This means, ***don't put anything into your email messages that you wouldn't want to see on the front page of the newspaper or be required to explain in a court of law.***

COMPUTER VIRUSES

Computer viruses are programs designed to make unauthorized changes to programs and data. Therefore, viruses can cause destruction of North Sound BH-ASO resources. They are much easier to prevent than to cure. Defenses include protection against unauthorized access to computer systems, using only trusted sources for data and programs, and maintaining virus-scanning software. For malicious software prevention requirements, see North Sound BH-ASO Policy 4007.00 *Malicious Software Prevention*.

IT Responsibilities

1. Install and maintain appropriate antivirus software on all client desktops, laptops, and servers.
2. Respond to all virus attacks, destroy any virus detected, reimage as needed, and document each incident.

Employee Responsibilities

1. Employees shall not knowingly introduce malware onto North Sound BH-ASO computers.
2. Employees shall not load any removable media not issued by IT or of unknown origin.
3. Incoming storage media, such as USB flash/hard drives, CD/DVD disks, audio recorders, or any storage device that can copy and hold data, shall be scanned for viruses before they are read.
4. Any employee who suspects their workstation has been infected by a virus shall immediately notify IT staff.

ACCESS CODES AND PASSWORDS

The confidentiality and integrity of data stored on North Sound BH-ASO computer systems must be protected by security controls to assure that only authorized employees have access. This access shall be restricted to only those capabilities that are appropriate to each employee's job duties. If an employee's duties require access to ePHI or HCA Category 3 or higher data, access shall be limited to the ***minimum information necessary*** to carry out those duties (least privilege).

IT Responsibilities

IT staff shall be responsible for the administration of access controls to all North Sound BH-ASO computer systems. IT staff will process additions, deletions, and changes.

Employee Responsibilities

1. Each employee shall be responsible for all computer transactions made with their user ID and password.
2. Each employee shall not disclose passwords to others. Passwords must be changed immediately if it is suspected they may have become known to anyone.
3. Each employee will follow the policies and procedures in North Sound BH-ASO Policy 4002.00 *Access Codes and Passwords*.

4. Each employee should lock or sign (log) out when leaving a workstation, unless instructed to do so by IT personnel for performing maintenance.

Manager Responsibility

Managers (or HR) shall notify IT staff promptly whenever an employee leaves the North Sound BH-ASO or transfers to another department so the employee access can be revoked or modified accordingly. Involuntary terminations must be reported concurrent with termination.

PHYSICAL SECURITY

It is North Sound BH-ASO policy to protect computer hardware, software, data, and documentation from misuse, theft, unauthorized access, and environmental hazards.

Employee Responsibilities

1. Electronic files and documents shall only be stored on the file server. Only copies shall be securely stored on removable media.
2. Removable media should be stored out of sight when not in use. If they contain sensitive or confidential data, they must be encrypted and/or locked up.
3. Removable media should be kept away from environmental hazards such as heat, direct sunlight, and magnetic fields.
4. Critical computer equipment (e.g., servers and network hardware), must be protected by an uninterruptible power supply (UPS). Surge protectors should, at a minimum, protect other computer equipment.
5. Environmental hazards to hardware such as food, smoke, liquids, high or low humidity, and extreme heat or cold should be avoided.
6. Since IT staff is responsible for all equipment installations, disconnections, modifications, and relocations, employees are not to perform these activities. This does not apply to temporary moves of portable computers.
7. Employees should exercise care to safeguard the valuable electronic equipment assigned to them. Employees who neglect this duty may be accountable for any loss or damage that may result.

COPYRIGHTS AND LICENSE AGREEMENTS

It is the policy of the North Sound BH-ASO to comply with all laws regarding intellectual property. North Sound BH-ASO and its employees are legally bound to comply with the Federal Copyright Act (Title 17 of the U.S. Code) and all proprietary software license agreements. Noncompliance can expose North Sound BH-ASO and the responsible employee(s) to civil and/or criminal penalties. This directive applies to all software owned by North Sound BH-ASO, licensed to North Sound BH-ASO, or developed using North Sound BH-ASO resources by employees or vendors.

IT Responsibilities

1. Maintain current records of all software licenses owned by North Sound BH-ASO within IT inventory.
2. Periodically (at least annually) scan North Sound BH-ASO computers to verify that only authorized and properly licensed software is installed.

Employee Responsibilities

Employees shall not:

1. Install software. Only software licensed to or owned by North Sound BH-ASO, or pre-approved open source or custom developed software, is to be installed on North Sound BH-ASO computers. Approved software will be installed by IT staff only.

2. Copy software unless authorized by IT.
3. Download software unless authorized by IT.

Acknowledgment of Receipt

All employees will receive a copy of these Information System Policy & Procedures and will be asked to sign a form acknowledging receipt of, understanding of, and agreement to the specific terms listed on the Acknowledgement of Information System Policy & Procedures form, attached.

REFERENCES

Policy 4001.01 *Acknowledgement of Receipt IT Policies & Procedures*

Policy 4002.00 *Access Codes and Passwords*

Policy 4005.00 *Email and Internet Security*

Policy 4007.00 *Malicious Software Prevention*