


CHAPTER Information Management	CHAPTER 07	SECTION 001	SUBJECT 10
SECTION Information Systems		DESCRIPTION Internet and E-Mail Use	
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APPLICATION:

<input checked="" type="checkbox"/> CMH Staff	<input type="checkbox"/> Board Members	<input type="checkbox"/> Provider Network	<input checked="" type="checkbox"/> Employment Services Providers
<input type="checkbox"/> Employment Services Provider Agencies	<input checked="" type="checkbox"/> Independent Contractors	<input checked="" type="checkbox"/> Students	<input checked="" type="checkbox"/> Interns
<input checked="" type="checkbox"/> Volunteers	<input type="checkbox"/> Persons Served		

POLICY:

Lapeer County Community Mental Health (LCCMH) computing and communication resources are intended for business purposes. Use of the LCCMH's computing and communication resources will fall within the guidelines of generally accepted social and business standards and demonstrate respect for all individuals. The Internet and Electronic-mail (E-mail) system is utilized for the purpose of making communications more effective and efficient.

This Internet and E-mail Use Policy complies with HIPAA and regulations requiring protection and security of electronic health information, as well as protects the confidentiality and integrity of confidential medical information as required by law, professional ethics, and accreditation requirements.

STANDARDS:

- A. The Internet and E-mail system are a part of LCCMH's business equipment.
- B. Internet and E-mail users restrict use of the Internet and E-mail system to proper business purposes relating to the care and treatment of persons served and related administrative matters.

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- C. Users must not transmit confidential or proprietary information to unauthorized recipients.
- D. Users must not access sites containing obscene, pornographic, offensive, harassing, or hostile material. No person shall enter, transmit, or maintain sites with derogatory or inflammatory remarks about an individual's race, age, disability, religion, national origin, physical attributes, sexual preference, or health condition. No person shall enter, maintain, or access sites with any abusive, profane or offensive language.
- E. Internet and E-mail usage must not involve any illegal or unethical activity.
- F. Internet and E-mail usage must not involve or disclose activity that could adversely affect LCCMH, it's officers, employees, or agents.
- G. Internet and E-mail usage must not involve solicitation. Employees may not use the facility's Internet or E-mail system to solicit for outside business ventures, organizational campaigns, or political or religious causes.
- H. Internet and E-mail users do not have a right to privacy in their use of the computer system or the Internet and E-mail component, nor does LCCMH guarantee that Internet and E-mail usage will be private. LCCMH reserves the right to monitor, audit, delete and read anything pertaining to Internet and E-mail usage. LCCMH has the right to monitor the contents of Internet and E-mail use and may monitor the contents and usage to support operational, maintenance, auditing, security and investigative activities.

PROCEDURES:

- A. All computer users must read and sign the Internet & E-Mail Use Policy Acknowledgement (LCCMH Form #301) indicating understanding and willingness to abide by the terms and conditions.
- B. Internet downloads and incoming E-mail is scanned by antivirus software. The antivirus software is automatically updated on the barracuda system. Users must report any possible virus-like activity to the network administrator immediately by completing a help desk ticket.

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- C. User login names and passwords are to be kept confidential. Use of another employee's access code or password to access the Internet and E-mail system is prohibited.
- D. A variety of sites are potentially destructive to the security of the LCCMH computer network, including the possibility of attacks on the computer network, serious bandwidth degradation, and harm to individual workstations. Users are not permitted to download music, software or computer enhancements. Users who need to download specific software work-related, must submit a help desk ticket request via email.
- E. Persons served must consent to the use of e-mail for confidential medical information by signing a Consent for Mental Health Services located in the electronic medical record.
- F. All e-mail concerning potential protected health information must include the agency confidentiality statement.
- G. Users must immediately report violations of this policy to their supervisor. Supervisors are responsible for ensuring all users are aware of restrictions related to confidentiality and privacy of consumers and protection of consumer information from unauthorized use, access, deletion, or dissemination.
- H. LCCMH maintains a spam filter and email encryption service through Barracuda called Barracuda ESS (Email Security System).
 - i) Content Filtration is performed on all outgoing email, which searches for potential HIPAA protected information and if it is found, then the email is encrypted.
 - ii) Email encryption may be manually applied by putting #Confidential tag in the subject or body of an email. If e-mail communication of protected and/or confidential information is required, encryption must be applied by including this tag.
 - iii) The spam filter attempts to prevent spam, phishing, or malware infested emails from being sent to staff. If such email is missed by the filter, then staff should notify the network administrator who will mark the email address or domain as spam. Staff will then delete the original email.

DEFINITIONS:

- A. HIPAA -- Health Insurance Portability and Accountability Act of 1996.

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- B. Internet and E-mail system -- A component of the LCCMH Local Area Network (LAN) providing a connection to the Internet and World Wide Web.
- C. Proprietary information -- Information belonging to LCCMH.
- D. Bandwidth -- The capacity of the physical lines connecting networks together to transmit packets of information.

DEFINITIONS:

Network degradation: decrease in connectivity and response speed throughout the network.

Help Desk Ticket: Automated issue tracking and logging, created by emailing helpdesk@lapeercmh.org.

Barracuda: an email security gateway that manages and filters all inbound and outbound traffic to protect organizations from email threats and data leaks. It also provides secure messaging through a Secure Message Center web portal.

REFERENCES:

LCCMH Internet and E-mail Use Policy Acknowledgement Form #301

AW:lr

This policy supersedes
#06/06029 dated 06/29/2006.
