

The Right Door for Hope, Recovery and Wellness

Chapter Title Fiscal	Chapter # F		Subject # 282.12
Subject Title Security Management	Adopted 3/15/05	Last Revised 3/17/17	Reviewed 3/15/05; 4/23/10; 2/24/14; 5/12/15; 9/15/15; 3/17/17

PROCEDURE

The purpose of security management is to prevent, detect, contain, and correct security breaches through risk analysis, appropriate configurations, and systems modifications.

Application

This procedure shall apply to The Right Door for Hope, Recovery and Wellness.

1.0 Security Incident

Security Incident is defined as the attempted or successful unauthorized access, use, disclosure, modification, or destruction of information or interference with systems operations.

In the event if a security incident, the MIS Supervisor shall immediately inform the CEO. It is the discretion of the CEO to proceed as needed with investigations, actions, and disciplinary measures. In addition, the CEO or designee shall report the incident to the Mid State Health Network.

All security incidents will be documented on the IS Security Incident Log. After documented, each incident will be investigated. If corrective action must occur, the corrective action and date it is completed will be documented.

2.0 Internal Audit

Internal audits will be performed at least quarterly in an attempt to minimize security incidents. Audits can include, but are not limited to, facilities tours, review of log files, systems review. Results of findings will be documented and kept. This process will result in an "internal certification" of systems compliance.

3.0 Minimum Necessary

The idea of "minimum necessary" will be employed at The Right Door for Hope, Recovery and Wellness. This entails only granting access permissions and

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authorization to data that is required to perform one's job duties and nothing more.

4.0 Access Authentication

Prior to establishing (or modifying) access to resources containing protect health information (PHI), a needs assessment will be performed to check whether or not this change in access meets the minimum necessary criteria. The same process will be applied when changes are requested to existing permissions.

5.0 Risk Analysis

A risk analysis will be performed prior to making changes to systems configurations or loading programs. The benefits of the change will be compared with the negatives and a determination will be made by the MIS Supervisor whether or not to make the change.

6.0 Risk Management

Risk shall be managed by minimizing the chances of security incidents. This will be accomplished by ensuring proper systems configurations, employing minimum necessary rules to all aspects of The Right Door for Hope, Recovery and Wellness network, and by providing training for all users on important security related issues.

7.0 Sanctions

Sanctions for violating security policies and procedures shall be employed evenly and fairly to all members of the organization. Exact disciplinary actions will be handled on a case by case basis by the CEO.

8.0 Business Associate Agreements

Business Associate Agreements will be held between The Right Door for Hope, Recovery and Wellness and all necessary parties as outlined in the HIPAA Security Regulations.

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This Policy encompasses HIPAA Security Regulations, "Security Incident Procedures", section 164.308(a)(6), "Evaluation", section 164.308(a)(8), "Information Access Management", section 164.308(a)(4), "Security Management Process", section 164.308(a)(1), and "Business Associate Contracts and Other Arrangement", section 164.308(b)(1).

Robert S. Lathers, Chief Executive Officer	Date		