

<b>CHAPTER</b> Information Management	<b>CHAPTER</b> 07	<b>SECTION</b> 001	<b>SUBJECT</b> 10
<b>SECTION</b> Information Systems		<b>DESCRIPTION</b> 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 Health Insurance Portability and Accountability Act of 1996 (HIPAA) 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.

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- 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.
- 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, its officers, employees, or agents.
- G. Internet and E-mail usage must not involve solicitation. Employees will 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 will monitor the contents and usage to support operational, maintenance, auditing, security, and investigative activities.
- I. Use of artificial intelligence (AI) systems with protected health information (PHI) is strictly prohibited. Users must not upload, input, or otherwise transmit any person served information, clinical documentation, progress notes, or other PHI-containing data to any external AI system or service not explicitly approved as HIPAA-compliant by Lapeer CMH. Such actions constitute a violation of confidentiality, may result in regulatory breaches with significant penalties, and are grounds for immediate disciplinary action up to and including termination.

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**PROCEDURES:**

- A. All computer users must read and sign LCCMH Form #301 Internet & E-mail Use Policy Acknowledgement 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.
- 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 work-related software must submit a help desk ticket request via E-mail.
- 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 E-mail encryption service through Barracuda called Barracuda ESS (E-mail Security System).
  - a. Content filtration is performed on all outgoing E-mail, which searches for potential HIPAA protected information and if found, the E-mail is encrypted.

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- b. E-mail encryption can be manually applied by putting #Confidential tag in the subject or body of an E-mail. If E-mail communication of protected and/or confidential information is required, encryption must be applied by including this tag.
- c. The spam filter attempts to prevent spam, phishing, or malware infested E-mails from being sent to staff. If such E-mail is missed by the filter, then staff will notify the network administrator who will mark the E-mail address or domain as spam. Staff will then delete the original E-mail.

**DEFINITIONS:**

**Artificial Intelligence:** computer program or other software capable of performing tasks typically produced by human intelligence.

**Computing:** use of operation of computers; process of using a computer to perform calculations or process data.

**Health Insurance Portability and Accountability Act of 1996 (HIPAA):** was enacted by the United States Congress and signed into law in 1996. Among other provisions, the law addresses the Privacy and Security of health data, and specifies standards meant to improve the efficiency, effectiveness, and safety of the nation's health care system by encouraging the widespread use of electronic data interchange in the U.S. health care system.

**Internet and E-mail System:** component of the LCCMH Local Area Network (LAN) providing a connection to the Internet and World Wide Web.

**Proprietary Information:** information belonging to LCCMH.

**Bandwidth:** capacity of the physical lines connecting networks together to transmit packets of information.

**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 E-mail security gateway that manages and filters all inbound and outbound traffic to protect organizations from E-mail threats and data leaks. It also provides secure messaging through a Secure Message Center web portal.

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**REFERENCES:**

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

AW & SK:lr

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