Standard Name:	Acceptable Use
Standard Number:	HR-ST-2.0.05-R1.0
Department:	I&T
Functional Area:	Information Security
Approved by:	Chief Information Officer
Effective Date:	8/3/2020
Version:	1.0
Standard Status:	Approved

I. Standard

Bon Secours Mercy Health's (BSMH)'s information systems must be protected and secured by all BSMH workforce members. Inappropriate use of information systems exposes BSMH to risks including virus attacks, compromise of network systems and services, and legal issues. These acceptable use requirements must be followed and adhered to in order to secure and protect BSMH systems.

II. Purpose

The purpose of this standard is to provide clear and concise rules for the acceptable use of BSMH information systems by all workforce members. BSMH Information & Technology (I&T) implements security measures and these acceptable use requirements to secure and protect BSMH systems.

III. Scope

This BSMH I&T standard applies to all workforce members and governs all data and systems (whether owned by or operated for BSMH business through contractual arrangements).

IV. Standard Details

A. General Requirements

1. All BSMH employees are required to complete an annual mandatory security awareness training on the acceptable use of BSMH information systems. Acknowledgement and agreement to adhere to the requirements in this standard is required during the training by completing the Privacy/Security Attestation agreement.
2. All information created on BSMH's information systems remains the property of BSMH.
3. All BSMH resources (e.g., computers, copiers/scanners, fax machines, tablets, mobile devices, pagers) should be used for business purposes only, except for limited personal use, provided such personal use does not interfere with work assignments and/or create network performance issues.

4. All workforce members have an ethical and legal duty to maintain confidentiality of all information belonging to BSMH regardless of form (verbal, written or electronic) both during and after their association with BSMH. Information must not be accessed or disclosed to unauthorized individuals or parties inside or outside of BSMH.
5. Every workforce member is responsible for the use of their BSMH account and equipment (PC, laptop, desktop, cell phone, etc.) and will be held responsible for any violations that are traced to their account or equipment.
6. Willful destruction of information, unauthorized access, modification to or disclosure of confidential information, or violations of any of the terms listed in this standard may result in access privileges being revoked and further disciplinary action up to and including the potential for suspension or termination from BSMH (see Corrective Action policy – BSMH-HR-CUL_014).
7. A workforce member that uses BSMH's systems may become personally subject to civil and criminal legal action and financial penalties resulting from privacy, security, and confidentiality breaches that they have committed.
8. BSMH I&T may monitor equipment, systems, email, text, instant messaging, Internet usage and network traffic at any time and without your consent or knowledge.
9. BSMH reserves the right to audit networks and systems on a periodic basis to ensure compliance with BSMH policies and standards.
10. Any lost or stolen information, electronic resource, or device must be reported immediately to the BSMH Service Desk (833-691-4357 or 833-MY1 HELP) so that the organization can initiate proper corrective action.
11. BSMH management shall approve the use of information assets and take appropriate action when unauthorized activity occurs.
12. If a BSMH workforce member has any complaints or concerns about compliance with the BSMH's security policies, standards, or procedures, the workforce member should contact the BSMH Ethics Help line (http://www.bsmhethicshelpline.org/).

B. Confidential Information

1. Workforce members must take all necessary steps to prevent unauthorized access to information that could be classified as confidential (i.e., corporate strategies, trade secrets, customer lists, Protected Health Information (PHI), Payment Card Industry Information (PCI), and Personally Identifiable Information (PII)).
2. Workforce members will not access or utilize confidential information

beyond what is provided or what is required to perform their job duties.

3. Workforce members must properly handle, store, and dispose of confidential information according to BSMH's Media Handling standard.
    a. Confidential information (PHI, PII, PCI, etc.) in paper form must always be shredded prior to disposal or placed in a secure disposal receptacle.
    b. Credit card information must never be stored either electronically or in paper form. Credit card information must never be included in email, FAX, text or Instant Messaging (IM) as these technologies are not secure.
4. Covered or critical information must be protected when using internal or external (e.g. USPS) mail services.

C. User ID and Passwords

1. Access to information systems is only granted when one has a legitimate business reason and must be necessary for the workforce member to conduct their job functions.
2. A workforce member's assigned ID is equal to a written signature and the assigned workforce member is responsible for all access and work completed under the authority of that ID.
3. Workforce members are responsible for keeping their passwords secure. Do not disclose or share passwords or logon accounts with any other person, including family members.
4. Do not write, email, or store passwords in easily accessible locations. Storing passwords in a secure password vault is acceptable as long as the password vault is encrypted.
5. If an assigned user ID or password has been compromised, stolen, or used inappropriately, immediately notify the BSMH Service Desk (833-691-4357 or 833-MY1-HELP) and change your password.
6. BSMH workforce members are strictly prohibited from circumventing user authentication or security mechanisms of any host, network, or account.
7. BSMH workforce members must not use the "Save Password" option available on software applications.
8. BSMH workforce members are responsible for constructing and using strong passwords (see the Authorized Access to Information Systems Standard for more details). A strong password must meet the following guidelines:
    a. It is at least 8 characters in length

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b. It utilizes at least 3 of the 4 classes of characters:
    i. Lowercase letters
    ii. Uppercase letters
    iii. Numerical digits
    iv. Special characters (e.g.! $, %, &)
c. A password must not be:
    i. A word in any language, slang, dialect, jargon, etc.
    ii. Based on personal information (e.g. name of family member, pet, birthday, address etc.)
    iii. Any common variation of a word found in a dictionary (e.g. P@ssw0rd for Password)

9. BSMH workforce members must change any password assigned to them at first use.

D. Communications-Email, Voicemail, Instant Messaging, Texting, and Faxing

1. BSMH communication technologies such as email, voicemail, instant messaging, texting, and faxing should be used for business purposes only (except for the limited personal use permitted under internal policy). Workforce members are expected to use BSMH resources in an efficient, effective, ethical, and lawful manner. Approvals must be obtained prior to using external public services including instant messaging or file sharing (e.g., AOL instant messenger, Yahoo instant messenger, DropBox, Box, Google Drive, etc.).
2. Sending any confidential information (i.e. PHI, PCI, PII, etc.) through email is strongly discouraged. If your job requires you to send any privileged, confidential, or sensitive information to outside parties via email, or fax, you must:
    a. Ensure that any confidential information in electronic form is encrypted when sent outside the organization. If you have an approved business purpose to send PHI outside the organization through email, you must include the word “Secure” (for Mid-American and Great Lakes groups) or SafeMail (for Mid Atlantic Group) in the subject line to encrypt the data.
    b. BSMH workforce members should not send PII/PHI over facsimile (FAX) unless it cannot be sent over other, more secure channels (e.g., delivery by hand, secure email). When faxing confidential data, ensure that the correct phone number and contact information is being used.

3. All email messages are the property of BSMH, and as such, are not private communications. Email communications may be monitored for training, maintenance, or investigative purposes. Deleting messages or email will not remove them from the database or protect them from auditing.
4. Never open attachments or follow links provided in email messages from senders you do not recognize. Use extreme caution when opening attachments or following links that originate from outside BSMH, even from senders you know. Links and attachments can be used to perform various malicious functions on workstations (e.g., install viruses, key loggers, remote access software, etc.).
5. Should you receive a suspicious email, click on a link that you suspect as being malicious, or provide your BSMH login credentials to an unknown source, contact the Bon Secours Mercy Health Service Desk at 1-833-691-4357. In addition, send an email to the Bon Secours Mercy Health Cybersecurity Security Operations Center at cybersecurity@mercy.com.
6. Unauthorized use or forging of email header information is prohibited.
7. Sending of “chain letters” or conducting any type of solicitation, unless permitted by law and or BSMH Human Resources policy for any organization not affiliated with BSMH, is prohibited.
8. Voicemail boxes must be protected by a PIN which must never be the same as the last four digits of the telephone number of the voicemail box.
9. Only BSMH approved, encrypted, and authorized messaging applications (e.g. PerfectServe) may be used for texting confidential information. The communicating of patient information via text message or IM is strictly prohibited.
10. Accessing personal email accounts (e.g. Gmail, Yahoo mail, etc.) from a BSMH resource is prohibited and will be blocked. Never use a Bon Secours Mercy Health computer to access personal email accounts (e.g., Yahoo mail, Google Mail, Hotmail. etc.). Personal email account security is not as strong as the level of security from Bon Secours Mercy Health managed security.
11. Using personal email accounts for BSMH business related communications is strictly prohibited.
12. Configuring a BSMH email account to forward messages to an email account outside of the BSMH email system (e.g., Gmail, yahoo mail) is strictly prohibited

E. Computers - Workstations, PCs, Laptops

1. All BSMH workstations, PCs, and laptops are securely set up with a password protected screensavers, configured by I&T, that will be activated after a specified time limit (e.g.15 minutes).
2. When leaving your workstation, a workforce member must always lock their computer (Windows Key + “L”, or Ctrl-Alt-Del and “Lock”), even if it is just for getting up to retrieve something at the printer or attending to a patient, even in an emergency.
3. Because information contained on computers is especially vulnerable, special care must be exercised as follows:
    a. Do not keep data and files anywhere on your computer’s local hard drive (i.e. the local computer’s “Desktop” or C drive). Data and files should be stored on your personal network drive for backup and protection.
    b. Be mindful of your surroundings. Shield login screens and other sensitive information from prying eyes. Use a shield/privacy screen in open areas where the public has access and could possibly see confidential data.
4. To protect the integrity of BSMH’s information resources, BSMH computer system configurations must only be modified by authorized BSMH I&T personnel.
5. Workforce members are strongly encouraged to use BSMH issued computer resources (laptops or desktops) to access the BSMH network. Workstations not issued by BSMH must meet BSMH security and technology standards and be approved for use by the I&T department prior to accessing the BSMH network. Required security configurations include, but are not limited to, the following:
    a. Implementation of full disk encryption.
    b. Implementation of a host firewall configured to block all but approved inbound connections.
    c. Implementation of an approved anti-virus solution, configured to automatically update as new anti-virus signatures become available.
    d. Implementation of an approved operating system version, configured to automatically install the latest operating system updates and security patches via the native operating system update service.
6. If a computer has been lost, stolen our used inappropriately, notify the BSMH service desk (833-691-4357 or 833-MY1-HELP) immediately.

F. Software

1. All software installed on a BSMH computer must be licensed and registered to BSMH.
2. Installation or modification to BSMH software or operating system configurations is prohibited. New installations or upgrades on BSMH resources should only be performed by authorized BSMH personnel.
3. All workforce members are expected to honor copyrights and software licenses and comply with all federal and state laws.
4. Workforce members should not use personally owned software on BSMH's information resources. This includes purchased and licensed applications, shareware, freeware, and other personally owned software.

G. Protecting Electronic Devices

1. All PCs (Desktops, Laptops) portable computing devices, and mobile devices accessing the BSMH network, systems, or data must be password protected, unless specifically authorized by BSMH I&T.
2. BSMH issued laptops, mobile devices and removable media shall be equipped with encryption or other security measures to protect the data contained within such devices.
3. Workforce members are forbidden from changing settings of, disabling, or bypassing virus detection software.
4. Unattended laptops and mobile devices must be secured to decrease the likelihood of loss or theft. Examples of securing a laptop or mobile device include:
    a. Locking the device(s) in an office, desk drawer, or filing cabinet. If computers are equipped with a locking port, they may be attached to a desk or cabinet using a cable lock system intended for such use.
    b. When traveling, workforce members should avoid leaving devices unattended at any time. When this is unavoidable, the device should be secured to the best of their ability. This may include securing the device in a room safe, locking the device in an automobile trunk, or securing the device to the interior of an automobile using the provided cable lock system (leaving a device in an automobile is not optimal and should only be done for the minimum time necessary).
    c. At no time should a device be placed in checked baggage.
5. When transporting a BSMH laptop outside of a BSMH facility, it must be turned off so that the full disk encryption is at its strongest state. A device

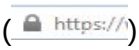
that is merely in hibernate or sleep mode is not considered to be fully protected.

6. When using a personal computer to access BSMH networks or systems, it is the responsibility of the workforce member to ensure that the computer meets BSMH corporate computer security standards. This includes keeping the system and all associated software up to date on versions and patches, implementing available software firewalls, and installing, running and keeping up to date a commercial anti-virus software solution (BSMH standard is McAfee)
7. The BSMH corporate standard, supported anti-virus software (McAfee) must be installed on all BSMH systems.
8. All BSMH workforce members must follow the recommended processes to prevent virus problems:
    a. If you are using a portable device, such as a USB device, the McAfee software will scan the files for viruses when you open them. Do not interrupt the scanning.
    b. Never share CDs, DVDs, USBs, or other disks unless there is a critical business requirement to do so.
    c. Never download files from unknown or suspicious source on the Internet.

H. Internet Usage

1. BSMH workforce members are expected to use the Internet responsibly and productively. Internet access should be limited to business related activities only. The use of the BSMH network and the Internet is a privilege, not a right, and inappropriate use will result in cancellation of these privileges.
2. All Internet data that is composed, transmitted, and/or received by BSMH's information systems are considered to be the property of BSMH, and as such, is subject to disclosure for legal reasons.
3. Avoid using public Wi-Fi locations when possible as your system and data could easily be hacked. When using a public Wi-Fi hotspot is unavoidable, always enable and use your VPN for all connectivity, whether or not it is BSMH related.
4. Do not download non-business files.
5. Use caution when following links on the Internet. Always know where the link goes before following. Links can be verified by hovering your mouse cursor over the link to reveal its true destination. If the web address is different from what is displayed in the text of the link, do not click on the

link.

6. Never use your BSMH ID or password to sign on to any personal Internet websites, including social media. Use a different password for each of your website logins. If a hacker gets your password, they will attempt to access other sites using it.
7. While the "Remember Passwords" feature on your browser is convenient, do not use it. If your computer is stolen, someone could potentially retrieve your passwords and get access to the BSMH systems you have been granted access to.
8. Never share personal information online. It could easily be used to hijack your BSMH account, apply for a credit card in your name, or possibly access your bank account.
9. Look for HTTPS with the padlock (

) in the web address, indicating a secure website, before you enter any sensitive or personal information onto that website.
10. BSMH reserves the right to monitor Internet traffic and data that is composed, sent, or received at any time without your consent or knowledge.

I. Social Media

1. Social media usage and blogging is subject to the terms and restrictions set forth in the BSMH Social media policy (BSMH-HR-CUL_008).
2. BSMH workforce members assume any and all risk associated with using social networking sites.
3. BSMH workforce members are expected to use the BSMH open-door philosophy to resolve workplace conflicts versus using social media.
4. BSMH workforce members are strictly prohibited from disclosing any BSMH confidential information (PHI, PII, PCI), proprietary or intellectual property information (confidential business data), or any other privileged information or material when engaged in blogging or posting to social media.
5. If a workforce member is expressing his or her beliefs and/or opinions in blogs or postings to social media sites, the workforce member may not, expressly or implicitly, represent themselves as speaking on behalf of BSMH.
6. Using social media for personal reasons on work time is prohibited.
7. Postings to newsgroups using a BSMH email address is prohibited unless it is business related and you have permission. Posting non-business

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related messages to large numbers of newsgroups (newsgroup spam) is prohibited.

8. Do not post to social media in patient areas or hospital kiosks.
9. Viewing, storing, transferring, posting, sharing or sending obscene, profane, libelous, pornographic, abusive, slanderous, defamatory, harassing, vulgar, hateful, threatening, discriminatory, illegal, and/or offensive materials is prohibited.
10. Workforce members may not create social media pages on behalf of BSMH without permission.
11. BSMH reserves the right to monitor, prohibit, restrict, block, suspend, terminate, delete, or discontinue your access to any social media site at work at any time without notice for any reason at its sole discretion.

J. Mobile Devices

1. Except in limited circumstances, BSMH does not issue mobile devices to workforce members, but rather follows a Bring Your Own Device (BYOD) program, permitting the use of Personal Mobile Devices for the limited access of BSMH data.
    a. Workforce members who use personal mobile devices to access BSMH data are required to adhere to the BSMH-HR-STRP_001 Personal Mobile Device Use policy.
    b. Workforce members must agree to have installed on their mobile device the BSMH standard Mobile Device Management (MDM) software suite.
    c. Workforce members are required to configure their mobile device with a 6 character access PIN to prevent unauthorized access.
    d. Workforce members must agree to allow the mobile device to be configured for auto-wipe after 10 invalid logon attempts.
    e. Workforce members must ensure that their mobile device is running a current version of operating system.
    f. Workforce members must agree to surrender their mobile device to BSMH at the request of I&T Security, Legal Department, Human Resources, or other management personnel for the purpose of analysis or data collection. Failure to comply with such a request may result in corrective action up to and including termination.
    g. Workforce Members using Personal Mobile Devices for approved access to BSMH applications (i.e. Haiku/Canto for ConnectCare/CarePath, Workday, encrypted text messaging) and

who have installed approved apps for this access will receive support from the various application teams via a Compass ticket for issues that arise in the use of those apps. Support for any other installed application or operating system other than those necessary for the approved access of BSMH data are the sole responsibility of the device owner and cannot be provided by BSMH I&T.

K. Unacceptable Use

1. The following activities are considered unacceptable and strictly prohibited, with no exceptions, and may lead to disciplinary action up to and including termination of employment. In cases of fraud, misuse, or breach of privacy laws, legal action may be taken.

    a. Engaging in activity that is illegal under any local, state, federal, or international law.

    b. Using BSMH devices or BSMH accounts to perpetrate any form of fraud, and/or software, film, or music piracy.

    c. Using BSMH devices for political lobbying.

    d. Providing information about, or lists of, BSMH workforce members to parties outside of BSMH.

    e. Sharing or providing access to your BSMH account or encouraging another workforce member to share or provide their account.

    f. Compiling subsets of BSMH data for personal use, whether in written or electronic form.

    g. Using BSMH resources for non-work related purposes or performing acts that waste BSMH's systems resources or monopolize resources (e.g., playing games, engaging in online chat groups, uploading or downloading large files, or accessing streaming audio and/or video files(e.g. March Madness streaming)).

    h. Downloading, installing, viewing, storing, transferring, posting, or sending obscene, profane, libelous, pornographic, abusive, slanderous, defamatory, harassing, vulgar, hateful, discriminatory, threatening, illegal, inappropriate, and/or offensive materials or messages. If a workforce member has knowledge of the transmission of inappropriate materials or messages, the workforce member is obligated to report it immediately to BSMH Corporate Responsibility via the BSMH Ethics Hotline.

i. Creating or distributing offensive comments or jokes that include but are not limited to: race, gender, hair color, disabilities, age, sexual orientation, pornography, religious beliefs and practices, political beliefs, or national origin.

j. Using a BSMH device to actively engage in acquiring or transmitting material that is in violation of sexual harassment or hostile workplace laws.

k. Vandalism, including but not limited to intentionally uploading or creating computer viruses, or introduction of malicious programs (i.e. viruses, Trojan horse programs, worms, email bombs) into BSMH's network or information systems.

l. Utilizing security or hacking software, tools, or techniques on the BSMH network in order to capture or modify information without proper authorization (e.g. packet capture, port scanning, ping floods, packet spoofing, denial of service, forged routing information for malicious purposes).

m. Unauthorized copying of copyrighted material, sharing trade secrets, patents, or other intellectual property owned by BSMH.

n. Tampering with or unauthorized destruction of information.

o. "Hacking" or gaining unauthorized access to other computers or computer systems or attempting to gain such unauthorized access.

V. Authority/Enforcement

The BSMH Chief Information Officer (CIO) shall have authority to interpret and apply this standard. This Standard may be modified or amended at any time, provided that it has been through a formal review and approval process. The Chief Information Security Officer (CISO) shall provide notice of any such modifications or amendments and will post the current version on the internal BSMH network where all employees may access it.

Non-compliance with this procedure by BSMH I&T employees and systems users without proper approval (see next section) is a serious matter and will be dealt with accordingly on a case-by-case basis. Depending on severity of violations and applicable legal statutes, consequences could result in removal of access rights and special system privileges, removal of system access, or, for BSMH I&T employees, disciplinary action to include potential termination of employment. In cases of fraud, misuse, or breach of privacy laws, legal action may be taken.

VI. Exceptions

Any deviation or exception from this policy may be appropriate in non-standard

circumstances and should be justified in written form and must be approved by the CIO & CISO (or designee), as prescribed by BSMH I&T “Managing Exceptions Standard.”

VII. Definitions

Underlined words identify terms that are defined in MP-ST-0.0.01-R1.0Information Security Governance Manual Attachment 1.

VIII. Attachments

NONE

IX. Related Policies, Standards & References

- Access Control Policy
- Human Resources Security Policy

X. Version Control

Version	Date	Description	Prepared By
1.0	Select Date	[Standard created and approved]	Bob Rogers, Lou Ann Gerard, Tom Kulas, Heather Rinsky, Kara Mueller

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