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## 1.0 Vision

Audrain Developmental Disability Services (ADDS) vision for technology is to ensure that the agency and its employees, provide the safest and highest quality of service to the community with the aid of technology. ADDS will pursue, when appropriate and sustainable, technology tools that increase our capacity to educate the public, get vital information to those who need it the most, measure and evaluate our work and effectively communicate with the community and surrounding areas.

#### 2.0 Purpose

The purpose of this policy is to describe what steps must be taken to ensure that users connecting to the agency network are authenticated in an appropriate manner, in compliance with agency standards, and are given the least amount of access required to perform their job function. This policy specifies what constitutes appropriate use of network accounts and authentication standards. In addition, the purpose of this plan is to assist staff with identifying assistive technology and implementing its use where it is needed and desired.

### 3.0 Scope

The scope of this policy includes all users who have access to agency-owned or agency-provided computers or require access to the network and/or systems. This policy applies not only to employees, but also to guests, contractors, and anyone requiring access to the agency network. Public access to the agency's externally reachable systems, such as the agency website or public web applications, are specifically excluded from this policy.

### **Hardware**

ADDS converted to a cable internet and phone system over 8 years ago. This conversion resulted in increased bandwidth at almost all locations. This conversion was prompted by ever increasing users, as well as a desire to begin the conversion of many of our systems to web-based applications. Both the internet services and phone services are maintained by Spectrum. The hardware is included in the monthly cost of service and no contract exists to prevent us from seeking another service provider at any time that ADDS desires.

Beginning in 2022, ADDS purchases hardware through our IT support provider so that technical support and warranty services are timely and convenient. In 2021 we contracted for IT support services through Marco Technologies. When technical and connectivity issues arise, this ensures that service is provided quickly through the ongoing service contract. The contract clearly delineates response time for various level of need. In 2021, we added network firewalls to our system to ensure security. Prior to this our individual computers were used to access cloud-based services as needed. With the current system, all users need a unique password to access our IT

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network, as well as their technology device provided by ADDS.

ADDS is currently evaluating the benefits of switching to the Phynx Fiber Optic network. While our current provider meets our needs, there are occasional outages and slower speeds. Due to an upcoming switch to Therap for electronic records, ADDS is considering an internet provider change.

#### **Devices**

All ADDS locations are provided with the proper equipment to read the Policy and Procedure manual, time clock, as well as training videos. This information is located on a laptop or some other technical device, such as a Tablet, ThinkPad, or Chromebox.

Priorities at the present time include:

- Purchase and install additional Meraki firewalls at offsite locations by June 1, 2022.
- Purchase 15 15.6" laptops to facilitate the move to Therap electronic records June 1, 2022.
- Cost:  $(\$1,000 \times 15 = \$15,000 \text{ budgeted})$
- Evaluate and determine if a switch to Phynx Fiber will be beneficial to the organization.
- Replacing computers purchased prior to 12/31/2016.

#### **Software**

Antivirus and antispyware software are renewed as necessary. The Technology Coordinator is immediately consulted when staff expresses a concern. If the problem is too complex for the Technology Coordinator to resolve, a ticket is submitted to Marco. ADDS has an existing relationship with this company for IT support.

ADDS switched to a web-based company called IPS (Integrated Payroll Services) in mid-2016 for payroll processing. This is also the web-based system that tracks employee time sheets in the form of clocking in and out online. This relationship also results in cloud-based backup of Payroll data.

Continued contract with Creative Software Solutions (Walker Tek Solutions) for web-based hosting and backup of TCM logging and billing software.

Continued conversion of paper documents to electronic. We prioritized conversion of all human resource records in 2013 and 2014. This has been accomplished and we now plan to explore conversion of accounting and TCM case records.

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The plan is to implement Therap records by June 1, 2022. This implementation will bring ADDS closer to comprehensive electronic records. All software purchased by ADDS must be approved by the Technology Coordinator and the Management Team. This will ensure that all software is licensed and does not conflict with the software installed on the computers.

#### Priorities for 2022 include:

- Upgrade to Therap electronic record keeping. Work through software "bugs" and any issue by June 1, 2022.
- Implement functionality of being able to track medication administration to reduce the occurrence of medication errors.
- Complete Staff training on Therap by June 1, 2022
- Complete Staff phishing audits and obtain results by 6/1/2022.

### **Security**

Health Information Portability and Accountability Act (HIPAA requires an annual risk assessment be conducted. Marco Technology conducted a risk assessment prior to our onboarding on April 7, 2021. The two areas needing additional focus are protection from external threats, such as phishing practices and more awareness of users actions. We have purchased 24 hours Managed IT support and associated software and the services and software are currently in use. This will better protect computers from phishing and malware attacks from e-mails, provide access to encrypted e-mail for all users and it will allow for better filtering to protect employees for browsing

Virus scanning software is installed on all computers through the network and this software will be updated automatically by Marco as they are developed. In outlying offices, network login is required in the same manner as Administrative offices.

Audit network for phishing attempts, as well as any other attempts at unauthorized access.

Mobile devices and all emails are encrypted to keep the data of individuals and access to the electronic record secure.

Cybersecurity insurance is important in the event of a ransomware attack. ADDS has implemented and maintained the coverage.

#### Priorities for 2022 include:

- Evaluate existing cybersecurity package and determine if any changes are necessary by 4/15/2022.
- Ensure all staff have completed security trainings provided by Marco by 6/1/2022.

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 Meet with Marco by 6/1/2022 to assess the results of security training and phishing audits.

### **Physical Security**

For all residential and program settings, ADDS uses a keypad system for entry into the exterior entrances. In addition, certain locations such as medication rooms have access controls that only allow access to designated individuals.

In addition, we have exterior video surveillance at our group residential settings. This assists with providing a record of incidents should they happen. This system was implemented following some incidents of theft and vandalism. Since the system's implantation it has been used to identify possible suspects in a bicycle theft.

### **Confidentiality**

All identifiable information is confidential and persons without the need to access this information will not have access. This is accomplished through the security levels, but ultimately is the job of every user to protect. Windows is set to automatically lock the computer if left unattended for more than 5 minutes. On the low-tech side, employees are to log off computers when they leave computers unattended for any period and log in on their return. Close doors upon leaving his/her office. In public places, care should be taken to turn monitor screens away from the view of the public or have security filters installed on monitors. Do not leave printed documents in public places.

## **4.0 Policy**

## 4.1 Account Setup

During initial account setup, certain checks must be performed in order to ensure the integrity of the process. The following policies apply to account setup:

- Positive ID and coordination with Human Resources is required.
- Users will be granted least amount of network access required to perform his or her job function.
- Users will be granted access only if he or she accepts the Acceptable Use Policy.
- Access to the network will be granted in accordance with the Acceptable Use Policy.
  - Users should be aware that the data they create on the systems remain the property of Audrain Developmental Disability Services.

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- Audrain Developmental Disability Services reserves the right to audit networks and systems (including data/internet usage/email usage etc.) on a periodic basis to ensure compliance with this policy.
- All personnel who use the system have an obligation to use the system in a
  manner that is appropriate, effective, and efficient for official business only
  use. Personnel must be aware that workstations may display sensitive and
  confidential information for the purpose of patient healthcare and transacting
  business. Therefor all personnel must use discretion and apply security
  measures while performing day to day activities.

## **4.2 Account Use**

Network accounts must be implemented in a standard fashion and utilized consistently across the organization. The following policies apply to account use:

- Accounts are created by a member of administration and are given to the employee upon starting the job.
- Accounts must be password protected. A password is provided to you by administration, which needs to be promptly changed upon first use.
- Accounts must be for individuals only. Account sharing, and group accounts are not permitted.
- User accounts must not be given administrator or 'root' access unless this is necessary to perform his or her job function.
- Guest access is not allowed under any circumstance. Only employees will be allowed network access.
- Individuals requiring access to confidential data must have an individual, distinct account. This account may be subject to additional monitoring or auditing at the discretion of the Technology Coordinator, Executive Director, Business Manager or as required by applicable regulations or third-party agreements.

### **4.3 Account Termination**

When managing network and user accounts, it is important to stay in communication with the Human Resources department so that when an employee no longer works at the company, that

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employee's account can be disabled. The Business Manager must be notified the in the event of a staffing change, which includes employment termination, employment suspension, or a change of job function (promotion, demotion, suspension, etc.). Marco monitors usage through various auditing methods. If a user fails to use accepted practices their account may be suspended immediately.

### 4.4 Use of Passwords

When accessing the network locally, there are no default administrative passwords set, all are unique.

## 4.5 Remote Network Access

Remote access to the network cannot be provided.

#### **4.6 Screensaver Passwords**

Screensaver passwords offer an uncomplicated way to strengthen security by removing the opportunity for a malicious user, curious employee, or intruder to access network resources through an idle computer. For this reason, screensaver passwords are required to be activated after 5 minutes of inactivity.

### **4.7 Minimum Configuration for Access**

Any system connecting to the network can have a serious impact on the security of the entire network. A vulnerability, virus, or other malware may be inadvertently introduced in this manner. For this reason, users must strictly adhere to agency standards about antivirus software and patch levels on their machines. Users must not be permitted network access if these standards are not met.

# 4.8 Encryption

ADDS invested in Google Business System, which includes email encryption. This system encrypts all emails which have the word "secure" placed in the subject line. Staff is instructed not to use unencrypted emails, such as personal or regular email to share information of confidential nature.

Keystone IT provides consultation for healthcare companies about security compliance.

### 4.9 Failed Logons

Repeated logon failures can indicate an attempt to 'crack' a password and surreptitiously access a network account. In order to guard against password-guessing and brute-force attempts, the

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agency locks user accounts after 3 unsuccessful logins. This is implemented by a time-based lockout that requires a manual reset, at the discretion of the Business Manager and Technology Coordinator

In order to protect against account guessing, when logon failures occur the error message transmitted to the user is not indicated specifically whether the account name or password were incorrect. The error is as simple as "the username and/or password you supplied were incorrect."

### **4.10 Non-Business Hours**

Since the company's business requires overnight network access, the company must not restrict account logon during off hours. On weekends, account access is not disabled.

### **4.11 Applicability of Other Policies**

This document is part of the agencies cohesive set of security policies. Other policies may apply to the topics covered in this document and as such, the applicable policies should be reviewed as needed.

### **5.0 Enforcement**

This policy will be enforced by the Technology Coordinator, Business Manager and/or Executive Director. Violations may result in disciplinary action, which may include suspension, restriction of access, or more severe penalties up to and including termination of employment. Where illegal activities or theft of company property (physical or intellectual) are suspected, the agency may report such activities to the applicable authorities.

## **Data Backup/Catastrophic Data Loss Prevention**

Payroll data is no longer backed up with MHC but is now all backed up in our web-based payroll system, IPS.

Human Resource Data has previously been backed up through the web based Filebound system. In 2020 we added a Human Resource module to our IPS system, which provides a logical and reliable backup of Human Resource data.

Billing data is secured and backed up by the Department of Mental Health through their CIMOR system, and TCM data is secured and backed up on an underground server managed by Walker Tech Solutions (WTS) in Springfield, Missouri.

A network hard drive serves as a daily backup for local computer email, word-processing and

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spreadsheet files. Jump drives (flash drives) are also used as another layer of backup with the drives kept in a secure location.

Be aware that hard drives can fail at any point of time without prior warnings and data or hard drives can become corrupt due to malware/virus attacks. There are several other similar factors that eventually leads to a data loss situation.

To safeguard yourself from such data disasters, create a habit of conducting scheduled backups and always handle the drive carefully (whether it's damaged physically or logically) to prevent a permanent data loss situation.

Stellar Data Recovery Professional for Windows is one of the most reliable data recovery tools that is developed by Stellar Data Recovery which is trusted by more than two million users worldwide. The tool helps you recover data from inaccessible, formatted, and corrupt hard drives or deleted partitions with just a few clicks.

In terms of Internet Outage, we contract with Spectrum for broadband service. Currently, we use Spectrum cable broadband service for Internet access. ADDS also has cellular phones that can also be used as a wireless access point to access the Internet in disaster situations.

### **6.0 Focusing on those we serve – Assistive Technology**

Our Technology goals have been laid out and implemented to serve both our staff and the individuals ADDS supports.

#### **6.1 Overview**

ADDS understands the importance of assistive technology and the bridge it offers to greater independence for all individuals, potential employees, and the individuals we serve. A simple tablet allows individuals the ability to share information and exchange communication. Assistive technology can be used by people with disabilities who have difficulty speaking, hearing, writing seeing or learning. Assistive technology lowers communication barriers and allow people to complete activities they might otherwise find challenging.

ADDS recognizes the importance of these technologies and their implementation in our agency. Our goal is to increase the success of everyone we support and employ, helping them to become more independent and successful.

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Examples of Assistive Technology:

Visual Aid Tools

**Educational Toys and Games** 

Computers

**Tablets** 

**Smart Phones** 

Apps and Software for Electronic Devices

**Mobility Devices** 

Smart Home Devices (e.g., Amazon Echo or Google Hub)

Remote Monitoring

Examples of less technical assistive devices are assistive reaching devices, ramps, adapted utensils, grab bars, canes and walkers, magnifying glasses, transfer boards, lowered countertops, flip books, communication boards, large print books, audio books, even your reading glasses are an assistive technology. There are many other examples of this type of technology.

### 6.2 Identification of Need

Individuals are encouraged to independently access any method they find helpful to their daily lives; however, it is also our staff and the other team member's responsibility to assist in the identification of any type of technology which might be helpful to individuals in our services. We also encourage staff to take advantage of any technology that is helpful yet respects the rights of others. Annually, the team should discuss the technologies available and use the ISP document to note the possible benefits of assistive technology.

### **6.3 Methods for Meeting Need**

ADDS utilizes assistive technology in all agency programs. Examples are too numerous to list in this plan. However, once a need is identified, every effort is made to provide the technology that is needed, typically through ADDS funding or Medicaid funding.

Assistive Technology devices can be obtained through private insurance and/or Medicaid (waivered services), sometimes schools. Most technology providers can provide the information necessary to determine and understand the specific criteria for funding and coverage. Appeal processes are often available if a device is denied. In addition, ADDS funds requests for affordable technology options

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#### 7.0 Definitions

**Antivirus Software**-An application used to protect a computer from viruses, typically through real time defenses and periodic scanning. Antivirus software has evolved to cover other threats, including Trojans, spyware, and other malware.

**Authentication** -A security method used to verify the identity of a user and authorize access to a system or network.

**Biometrics** -The process of using a person's unique physical characteristics to prove that person's identity. Commonly used are fingerprints, retinal patterns, and hand geometry.

**Encryption** -The process of encoding data with an algorithm so that it is unintelligible without the key. Used to protect data during transmission or while stored.

IMS – Information Management Systems, also known as Paper Free Office Solutions

**IPS** – Integrated Payroll Services

**Password** -A sequence of characters that is used to authenticate a user to a file, computer, or network. Also known as a passphrase or passcode.

**WTS** – Walker Tech Solutions

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### **Summary**

### Gaps and Opportunities

- 1. ADDS has had gaps with regard to how we can share information through technology. The addition of the Therap software will provide an opportunity to safely share encrypted data when it is necessary.
- 2. Therap will also allow administrators to easily audit the records of the individuals we serve, helping to ensure high quality services. This addresses a gap we had previously of an efficient audit system for our records.
- 3. A change from cable to fiber-based internet would provide a much more reliable internet connection.

#### Progress - 2021

- 1. Marco has been contracted for IT management and 24-hour IT support.
- 2. Implemented firewalls and mail quarantine capabilities
- 3. Security training and Phishing audits initiated
- 4. Cloud-based network upgraded with Marco managed IT
- 5. Installation of Meraki firewall at Administrative Office.

#### Action Steps for 2022

- 1. Upgrade to Therap electronic record keeping. Work through software "bugs" and by June 1, 2022, have Therap up and running.
- 2. Implement functionality of being able to track medication administration to reduce the occurrence of medication errors.
- 3. Complete Staff training on Therap by June 1, 2022
- 4. Purchase 15 new computers to aid our conversion to Therap record keeping. (Cost \$15,000)
- 5. Install 6 Meraki modem/firewalls at programs to aid in security and internet connectivity. (Firewalls purchased in 2021/Estimated cost of install \$2500)
- 6. Retire five older laptops purchased greater than 5 years ago. Remove all data and destroy the devices
- 7. Obtain bid from Phynx fiber for internet service.

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## **8.0 Revision History**

Revision 1.0, 06/16/2016

Revision 2.0, 01/19/2017

Revision 3.0, 01/18/2018

Revision 4.0, 01/17/2019

Revision 5.0, 01/16/2020

Revision 6.0, 01/20/2021

Revision 7.0, 02/17/22