

	Guideline: ITS Information Technology Acceptable Use Procedure	
	Department Responsible: SW-ITS-Administration	Date Approved: 06/19/2024
	Effective Date: 06/19/2024	Next Review Date: 06/19/2025

INTENDED AUDIENCE:

Entire workforce

PROCEDURE:

In accordance with the standards set forth under federal and state statutory requirements (hereafter referred to as “regulatory requirements”), Cone Health is committed to ensuring the confidentiality, integrity, and availability of protected health information and electronic protected health information (PHI/ePHI), as well as sensitive and confidential data it creates, receives, maintains, and/or transmits. For purposes of this procedure, PHI, ePHI and sensitive and confidential data shall be referred to herein as “covered information.”

The purpose of this procedure is to define roles and responsibilities, set expectations, and establish processes associated with acceptable use of organization or personally owned information technology.

Scope and Goals:

The scope of this procedure is to define the organization’s expectations for acceptable use of information technology in or outside the workplace or as a representative of the organization while performing tasks or fulfilling job responsibilities. The goals of this procedure are as follows:

- Define acceptable and unacceptable behavior when using information technology assets (i.e., organization or personally owned), the internet, social media, and email.
- Define security and privacy requirements that pertain to the protection of covered information and employee, patient, and customer’s safety.
- Define preventative measures that help avoid confidentiality breaches or loss of property.
- Define technology care, protection, and disposal requirements.
- Establish privacy expectations when using information technology.
- Define reportable incidents and the procedure used to report such incidents.

Responsibilities:

Chief Information Security Officer (CISO):

The CISO is responsible for a number of activities, including, but not limited to, the following:

- Revisions, implementation, workforce education, interpretation, and enforcement of this procedure.
- Work with People and Culture (HR) to help them understand the severity of violations to this procedure.
- Approving the use of information assets and organizational systems by the Cone Health workforce and ensuring that the security requirements stated in this procedure are complied with while using said assets and systems.

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Information and Technology Services (ITS):

ITS is responsible for a number of activities in connection with this procedure, including but not limited to, the following:

- Implementing technology controls to monitoring workforce activities when using information technology and report to the CISO events that are in violation of this procedure.
- Approving all software that will be installed on Cone Health information technology assets. ITS will ensure the software will not damage or disrupt the network or other information technology resources.
- With respect to workforce members who have been approved to purchase software, information such workforce members whether ITS can support the software once installed.

People and Culture (HR):

People and Culture will consult with the CISO to help them understand the severity and scope of procedure violations so that they can determine the appropriate disciplinary action to take.

Workforce:

Workforce members (i.e., Cone Health employees and contractors; also refer to the applicability section below) are responsible for:

- Reading and signing off on all requirements stated in this procedure.
- Reading applicable information security policies and procedures at least annually.
- Actively participating in all security awareness and education training events.
- Reading security awareness documentation/email when made available.
- Bringing to the attention of the CISO any questions or concerns related to information security.
- Promptly report upon observation, suspected and known privacy and/or security incidents to the CISO by telephone, email, in person or anonymously via the EthicsPoint portal.
- Complying with the requirements described in this procedure and for reporting any deficiencies or instances of non-compliance to the CISO.
- Workforce members are responsible for all activity performed under their assigned userIDs.

General Security Terms and Conditions:

Workforce members of Cone Health have a responsibility to perform their duties in an ethical and professional manner. A significant part of the duties of workforce members will involve the use of different types of information technology. As such, Cone Health expects workforce members to carry out their job responsibilities in the same ethical and professional manner as they would when not using technology.

Improper or unacceptable use of information technology can easily turn into a breach of patient confidentiality, criminal and civil liabilities against the organization, and threats to the safety and welfare of patients, coworkers, and clients, etc.

This agreement is required to be read, signed, and complied with by all workforce members prior to being given any access to all Cone Health information systems. The information system user signing this Agreement will only access, use, and disclose covered information in any medium as needed to perform his/her job responsibilities as allowed by law, organization policies, standards, and procedures, and/or as agreed upon between said user and Cone Health.

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1. I will assume sole and absolute responsibility to protect covered information in my possession in accordance with Cone Health security policies. This includes safeguarding and maintaining the confidentiality, integrity, and availability of all covered information I use, disclose, and/or access at all times, regardless of where I am working or how I am accessing the information.
2. I will only access, use, and/or disclose the minimum necessary covered information I require to perform my assigned responsibilities and will only disclose it to other individuals/organizations who need it to perform their assigned responsibilities. Protected health information (PHI) is specifically protected, by law, from further disclosures without prior authorization.
3. I will not use unapproved systems/programs/applications to transmit covered information. (Note: This applies to information sent internally on the corporate network and externally to a third-party entity).
4. I will only retain covered information only for as long as it is necessary.
5. I will not access my own, or any family member's or other person's, record in any information system without prior authorization from Cone Health's chief privacy officer (unless the activity has already been approved as a requirement assigned responsibilities).
6. I will not disclose/share any covered information with others who have not been formally authorized to have access to or knowledge of the information.
7. I will not download covered information to any personally owned computing devices.
8. I will not divulge, copy, release, sell, loan, alter, or destroy any covered information except as authorized by Cone Health's policies/procedures.
9. I will not download any covered information off Cone Health information systems to store or use it on any system, workstation, mobile devices, portable media (e.g., flash/thumb drive, CD-ROM, etc.), except in situations whereby explicit approval to do so has been granted by Cone Health's chief information security officer or chief privacy officer.
10. I will not download any software program onto Cone Health equipment without prior written approval from Cone Health's CISO.
11. I understand that access to all Cone Health's information systems, including email and internet, are intended for business purposes.
12. I will use approved secure communications for transmitting covered information to authorized entities, in accordance with Cone Health security policies.
13. I will only access or use the systems or devices that I am being authorized to access and agree not to demonstrate the operation or function of any of Cone Health's information systems or devices to unauthorized individuals.
14. I will never use tools or techniques to break/exploit security measures.
15. I will never connect to unauthorized networks with Cone Health's systems or devices.
16. I understand that I have neither ownership interest nor expectation of privacy in any information accessed or created by me during my relationship with Cone Health. Cone Health will audit, log, access, review, and otherwise utilize information stored on or passing through its systems for purposes related to maintaining the confidentiality, security, and availability of covered information.
17. I will not use Cone Health's information systems to transmit, retrieve, nor store any communications consisting of discriminatory, harassing, obscene, solicitation, or criminal information.
18. I understand that my user login ID (userID) and password(s) are used to control access to Cone Health's information systems and covered information. I will not share my userID and

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password/codes with anyone, nor allow anyone to access any information systems I am authorized to access, using my userID and password(s).

19. I understand that I will be held accountable for all activities associated with my userID.
20. I will not use anyone else's userID and password(s).
21. I will immediately notify the CISO if my password has been seen, disclosed, or otherwise compromised.
22. I will immediately report to the CISO any activity that violates this agreement, federal or state laws, or any other incident that could have any adverse impact on covered information and Cone Health.
23. Upon completion and/or termination of access to Cone Health's information systems, I will return all devices containing covered information or paper covered information to my manager.
24. I affirm that I will maintain the confidentiality, integrity, and availability of all covered information even after termination, completion, cancellation, expiration, or other conclusion of access to Cone Health's information systems.

Mobile Device Acceptable Use:

The purpose of this section is to advise you of your responsibilities for the use and protection of Cone Health mobile device(s) that have been issued to you. As a user of a Cone Health mobile device, you are responsible for complying with all information security policies and procedures which include the following specific requirements:

- You will not perform any kind of maintenance on this mobile device unless it is within the scope of your job responsibilities.
- You will not change or disable any security settings that could negatively impact the security of the operating system, computer, or the information that resides on it. This includes jailbreaking or rooting the device.
- You will not upload or download any programs onto this mobile device without the approval of Cone Health's Information Technology Department unless it is within the scope of your job responsibilities.
- All covered information stored on the hard drive of this mobile device will be encrypted in accordance with Cone Health's Data Classification and Handling procedure.
- Only approved application stores can be used to download software. The use of unapproved application stores is prohibited for company-owned and BYOD mobile devices. Non-approved applications or approved applications not obtained through the application store is prohibited.
- You will not store passwords, PINs, passcodes, etc. (to include flash/thumb drives, etc.), in the mobile device storage case.
- You are responsible for properly safeguarding this computer against unauthorized use in accordance with Cone Health's Information Technology Acceptable Use procedure and Teleworking Security procedure.
- For any reason should you or Cone Health terminate your employment/contract, all equipment will be returned to Cone Health, including the accessories (i.e., carrying case, backup drives, thumb/flash drives, power adapter, etc.). You will not give your mobile device to any other employee, unless instructed to do so by People and Culture or ITS.
- Immediately report a lost or stolen mobile device to Cone Health's CISO.

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When traveling, you will take the following precautions:

- In situations where you cannot maintain physical possession of the mobile device, secure the mobile device in a manner that will prevent unauthorized access or theft (e.g., secure in trunk of a vehicle, hotel safe, or some kind of locking container that can only be accessed by you). If this is not possible, store the device out of sight (i.e., hotel room in a drawer underneath clothes).
- When traveling by plane, treat the mobile device as carry-on, never check as normal baggage.
- Never store in overhead compartments on mass transit systems (e.g., aircraft, buses, shuttles, trains, etc.)
- If you do a considerable amount of travel, talk to the CISO about purchasing an anti-theft device.
- Always be aware of people who may be eavesdropping when you work in public places or in close proximity with other people (i.e., coffee shop, restaurants, aircraft, etc.). If necessary, consider the purchase of a privacy screen for your mobile device.
- If you have reason to believe that you have been working in a place that would be considered high risk for device tampering, interception of communications, etc., immediately report this to ITS upon your return so that your device can be checked for tampering and malicious software.

Email Acceptable Use:

Cone Health's email system will be used for business purposes in an appropriate and professional manner and will not be used for any of the following unacceptable practices:

- Sending covered information via email outside of Cone Health's network without using approved encryption, in accordance with Cone Health's Data Classification and Handling procedure.
- Use that violates Cone Health's Professional Code of Conduct or Harassment policy.
- Knowingly distribute email chain letters or hoaxes.
- Knowingly distribute email malware.
- Advocating personal religious or political views and opinions.
- Solicitation for personal gain (unless approved by People and Culture, i.e., sale of personal property, fundraising, etc.).
- Gambling.
- To send messages with derogatory, discriminatory, or inflammatory remarks about an individual's race, color, age, sex, disability, religion, national origin, physical attributes, or sexual preference.
- To make false or misleading statements about Cone Health's patients/customers/clients, fellow workforce members, leadership, co-workers, business partners, etc.
- Forging or attempted forgery of email.
- Reading, deleting, copying, or modifying another coworker's email with malicious intent.
- Using abusive, profane, or offensive language within email.
- Violating the laws and regulations of the United States or any other nation, or the laws and regulations of any state, city, province, or other local jurisdiction.
- Engaging in fraudulent activities.
- Sending or receiving material that is vulgar, offensive, pornographic, anti-Semitic, racist, or sexual in nature.
- Engaging in activities that disrupt or interfere with the performance of Cone Health's network or systems.

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- Harassing, threatening, or stalking others.
- Disclosing someone's security code or password.
- Transmitting copyrighted materials or intellectual property to anyone without the permission of the copyright/property owner.
- Using "email anonymous" services to hide your identity or masquerade as someone else.
- Using another person's e-mail account to send or receive messages, without their approval.
- Forwarding email from a Cone Health account (all or in part) to an external address (i.e., personal email account).
- Sending personal comments or opinions via email that would give readers the idea that you are speaking on behalf of Cone Health.

If you receive an email that seems suspicious, immediately inform security. DO NOT respond to these types of email, as they could be a phishing attempt or another type of email that will infect your asset with malware. Keep in mind, that it is possible for these types of emails to look like they are from a credible source. Always be sure to check the email address of the sending entity as this will not normally match up with the content of the email. Also, do not open attachments or click links within these types of emails as they will likely lead you to a landing page for the purposes of collecting your access credentials or they will immediately infect your asset with malware.

Internet Acceptable Use:

Cone Health owned assets with the ability to access the internet will be used in a professional and appropriate manner. The following practices are unacceptable:

- Transmitting covered information over the internet without proper encryption in accordance with Cone Health's Data Classification and Handling procedure.
- Use that violates Cone Health's Professional Code of Conduct and Harassment policy.
- Advocating personal religious or political views and opinions, provided, however, that an employee is permitted to send emails to government officials and other lobbying groups concerning matters affecting Cone Health.
- For solicitation for personal purposes or for personal gain, to include gambling.
- To make false or misleading statements about Cone Health, patients/customers/clients, fellow workforce members, leadership, business partners, etc.
- To transmit or download content of a discriminatory, racist, or harassing nature.
- To transmit or download content of an obscene or pornographic nature.
- Violating the laws and regulations of the United States or any other nation, or the laws and regulations of any state, city, province, or other local jurisdiction.
- Engaging in fraudulent activities.
- To view pornographic, racist, discriminatory, hate sites, or any other sites deemed inappropriate by Cone Health.
- Engaging in activities that disrupt, disable, or interfere with the performance of Cone Health's network, systems, or applications. This includes the deliberate development and/or propagation of malware or the transfer of malware designed to crash, damage, or impair Cone Health's or a third-party network or their external or internal systems.
- To harass, threaten, or stalk others.
- To intentionally disclose anyone's security code or passwords without their authorization.

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- To transmit copyrighted materials belonging to entities other than this company, without the permission of the copyright holder.
- To knowingly download or distribute pirated software.
- To post derogatory or unprofessional personal comments or opinions on newsgroups, blogs, social networking sites, etc. that could give readers the idea that I am speaking on-behalf of Cone Health.
- For the misappropriation or theft of intellectual property or copyrighted material.

Social Media Acceptable Use:

Refer to the Social Media policy for acceptable use guidelines regarding what you should and should not do when publishing content on social media.

Portable Media Use:

The general rule of thumb is that portable media (i.e., CD-ROM, flash/thumb drive, etc.) will not be used to store covered information. If you have justification to do so and approval from the CISO, the following rules apply:

- Media will be encrypted using approved software.
- Maintain constant surveillance over the media and if you need to leave it unattended, it will be locked in a manner to prevent unauthorized access.
- In the event of a suspected or actual event where media is improperly disclosed, lost, or stolen, ITS and/or the security team must be immediately notified.
- Personal portable media will never be used for covered information.

Software Use and Accountability:

Only software that has been approved for legitimate business requirements and has been evaluated and approved for use by ITS will be allowed on Cone Health's information technology assets.

Voice Over Internet Protocol (VoIP) Use:

The use of voice over internet protocol or VoIP is authorized at Cone Health. When using VoIP, the following security requirements must be followed:

- Only the following programs are allowed: Cisco Jabber using Cone Health userID and password.
- VoIP system performance is monitored by Cisco's Real Time Monitoring Tool (RTMT).

Disposal of Software, Hardware, and Media:

All software and hardware owned by Cone Health will be disposed of by ITS. This is done to ensure that all copyright laws are obeyed, and computer hard drives are properly erased or destroyed and accounted for, in accordance with regulatory requirements, and organizational policies/procedures. Portable media will be destroyed in accordance with Cone Health's Technology Asset Management procedure.

Hardware Use:

The following rules apply to all Cone Health owned information technology hardware resources:

- All information technology hardware must be pre-approved by ITS to ensure it is compatible with Cone Health's network and complies with security requirements.

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- Personally owned devices (i.e., computers, tablet PCs, smartphones, etc.) are not authorized for use with or connected to Cone Health's network unless approved by ITS and in compliance with Cone Health's Personal Device Use procedure.
- All Cone Health owned information technology hardware will be promptly returned to ITS when no longer needed or upon terminating employment. Information technology assets will not be repurposed, donated, disposed of, or returned to a leasing agency (if applicable) by anyone other than ITS and only after it has been properly sanitized in accordance with the organization's Technology Asset Management procedure.

Personal Device Use:

For those workforce members who have been approved to use personal devices for work related purposes, they must comply with the Personal Device Use procedure.

Working Offsite:

Cone Health workforce members who travel or periodically work from home or from a public location (i.e., coffee shop, restaurant, etc.) will comply with Cone Health's Teleworking Security procedure.

Physical Security:

Workforce members will only print to and copy on approved business office machines (i.e., printer/copier/fax/scanner). Workforce members will immediately retrieve covered information from shared business machines unless the machine has a personal mailbox that is password controlled. At no time will covered information or other confidential data be left unattended on business office machines or at workspaces. Hard copies of covered information are secured in locked cabinets, drawers, etc. at the end of the workday.

Computers that work with covered information will not be located in public areas where access cannot be controlled or continually monitored.

When working on covered information, Cone Health workforce members will position their computer monitors in a manner that prevents unauthorized/casual viewing. If monitors cannot be positioned to prevent unauthorized/casual viewing, then privacy screens/filters will be used.

Restricted Areas:

Workforce members who have access to restricted areas will refrain from any activity that could lead to a compromise of restricted area security (i.e., leaving personnel who do not have access alone in a restricted area, disabling the locking mechanism of a door leading to a restricted area, propping the door open to a restricted area, etc.).

Workforce members who do not have access to restricted areas will not attempt to circumvent security or forcibly attempt to enter restricted areas.

Workforce members will return all building keys and badges to their manager or People and Culture on their last day of employment/contract work.

Workforce members who are issued keys will immediately report lost or stolen key to CISO.

Employee/Contractor Identification Badges:

All Cone Health workforce personnel will be issued their own identification badge that will be used to identify them as employees or contractors in Cone Health facilities. The following rules apply for identification badges:

- Workforce members will wear their badge in a manner that it is clearly visible to everyone they come into contact with.
- Under no circumstances will Cone Health workforce members let someone else use their badge.
- Workforce members will immediately report lost or stolen badges to the CISO as soon as feasibility possible.
- Workforce members will return their identification badge to People and Culture (or supervisor) on their last day of employment/contract work.
- Business visitors are required to sign a visitor log, wear a visitor badge during the entire duration of their visit and be escorted when appropriate (refer to the Facility and Environmental Security Management procedure).
- Workforce member will challenge people not wearing badges, or who you suspect are not a part of the workforce, or when a person is in an area they should not be.

Personal Photo Use:

All Cone Health workforce personnel will have the option to upload a personal photo for online identification within Cone Health systems. This picture will not change the photo used on the employee's badge and in the event the employee does not update their picture, the online photo will default to their badge photo. Rules for online photos are as follows:

- Only the employee may be in the picture (no pets, family members, friends, etc.).
- The employee's face must be clearly visible.
- The photo must be recent and reflect the employee's current presence.
- The image must be business appropriate; revealing or suggestive images are unacceptable.
- By uploading the image, the employee acknowledges that they own the copyright for said image and thereby grant Cone Health full rights to utilize the image in any manner and without expectation of compensation.

Password Use:

Password composition, change intervals, restrictions for reuse, etc., are enforced by each information technology system, thereby alleviating workforce members of this responsibility. Password requirements that are still a part of workforce members' responsibilities are as follows:

- Workforce members will log out of the system and off the network, if they plan to leave their computer unattended for any amount of time or will engage a password protected screensaver.
- Workforce members will use different passwords for each application/system they have access to. This prevents anyone from having full access to all systems a member has if their password is compromised.
- Workforce members will never share their passwords. If a password must be shared during an emergency or in the event there is a problem with his/her computer, change the password as soon as possible after the problem has been resolved.

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- Workforce members will never transmit/send/email passwords in the clear (readable text and unencrypted) over the internet or any other untrusted network.
- For passwords that are not received as part of an automated process, workforce members will acknowledge the reception of passwords either through a direct phone conversation with the helpdesk or through some other form of communication (i.e., email, instant message, etc.)
- Workforce members will commit passwords to memory. Passwords should never be written down and stored anywhere. Workforce members may also utilize smartphone password vault applications to store passwords, provided they are approved for use by the CISO.
- Workforce members will never store passwords:
 - In laptop cases
 - Unencrypted in files or directories on the network
 - Unencrypted on smartphones, etc.
 - Around the workspace/area

If workforce members suspect that their password may have been compromised, they will change it immediately. If there is reason to believe that the password was forcibly or inappropriately obtained, workforce members will immediately report the incident to the security officer.

Privacy Expectations:

Cone Health will make all reasonable attempts to provide security and privacy for its employees. However, the organization cannot guarantee absolute privacy for documents created, stored, transmitted, or received on Cone Health's computers or while working on the internet. Cone Health routinely backs up computers and these backups are retained for varying periods of time. Cone Health also tracks and records where workforce members go on the internet and what phone numbers they call from the organization's telephone system. Management, People and Culture, or ITS personnel occasionally access these files for different purposes, to include monitoring computer usage (e.g., email, internet activity, etc.) and examining file content.

Cone Health computer systems, email, telephone systems, and internet are for the exclusive use of Cone Health's workforce for work-related purposes. Individuals using these resources with or without proper authority, or in excess of their authority, are subject to having all of their activities on these systems monitored and recorded in accordance with federal and statutory requirements. Use of these resources implies consent to such monitoring. If such monitoring reveals possible evidence of inappropriate or criminal activity as defined by Cone Health's information security policies, ITS will provide this evidence to your immediate supervisor, People and Culture, and/or law enforcement officials for appropriate disciplinary or legal action.

Security Incident Reporting

Expeditious reporting of suspected or actual security incidents to the CISO cannot be stressed enough. Workforce members must not hesitate to report any of the following, suspected or otherwise:

- Use of another person's password and/or account to login to a system without consent.
- Failure to properly protect passwords and/or access codes.
- Installation of unauthorized software.
- Falsification of information.
- Loss or theft of equipment or software.

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- Destruction or tampering with equipment or software.
- Posting of covered information on the internet.
- Use of personal email, text/instant messaging, etc. for work related purposes.
- Improper disposal of portable media and mobile devices.
- Terminated workforce member accessing applications, systems, or network.
- Insider threats (i.e., disgruntled employee that is suspected to pose a threat to the workforce or technology resources)
- A missing or misplaced technology asset
- A technology asset with no asset identification tag
- Discovery of an unidentified technology asset
- Unauthorized log-on or log-on attempts using your userID

Incidents, actual or suspected need to be reported immediately to:

- CISO
- Chief Privacy Officer
- Manager

Workforce members can report incidents, actual or suspected, or suspicions of insider threat without fear of repercussion.

Workforce members will also have access to a duress alarm that can be activated in the event of an emergency. These alarms will be responded to promptly and by the appropriate staff.

Terms and Conditions of Employment:

Workforce members will cooperate with federal, state, and internal investigations (disciplinary or otherwise). Failure to do so can result in disciplinary action up to and including termination.

Documentation Retention:

Previous versions of this procedure must be retained for at least 6 years.

Exception Management:

Exceptions to this procedure will be evaluated in accordance with Cone Health's Information Security Exception Management procedure.

Applicability:

All employees, volunteers, trainees, consultants, contractors, and other persons (i.e., workforce) whose conduct, in the performance of work for Cone Health, is under the direct control of Cone Health, whether or not they are compensated by Cone Health.

Compliance:

Workforce members are required to comply with all information security policies/procedures as a condition of employment/contract with Cone Health. Workforce members who fail to abide by requirements outlined in information security policies/procedures are subject to disciplinary action up to and including termination of employment/contract.