




Section: <b>Information Technology Services</b>	Policy Name: <b>ISM Internet Acceptable Use</b>		Policy Number: <b>07.03</b>
Owner: <b>Chief Information Officer</b>	Reviewed By: <b>Natalie Spivak</b>		Total Pages: <b>5</b>
Required By: <input type="checkbox"/> BBA <input type="checkbox"/> MDHHS <input type="checkbox"/> NCQA <input type="checkbox"/> Other (please specify): _____	Final Approval By: 		Date Approved: 2/20/2020
Application: <input checked="" type="checkbox"/> SWMBH Staff/Ops <input type="checkbox"/> Participant CMHSPs <input type="checkbox"/> SUD Providers <input type="checkbox"/> MH/IDD Providers <input type="checkbox"/> Other (please specify): _____	Line of Business: <input checked="" type="checkbox"/> Medicaid <input type="checkbox"/> Other (please specify): <input checked="" type="checkbox"/> Healthy Michigan <input checked="" type="checkbox"/> SUD Block Grant <input checked="" type="checkbox"/> SUD Medicaid <input checked="" type="checkbox"/> MI Health Link		Effective Date: <b>2/17/20</b>

**Policy:**

- A. The primary purpose of Internet use when using Southwest Michigan Behavioral Health (SWMBH) equipment, systems, or sites, or when conducting work-related matter for SWMBH, shall be to advance the mission of SWMBH. SWMBH employees must use all Internet privileges responsibly.
- B. Only authorized users shall access the Internet using SWMBH equipment or systems. Each employee has a responsibility to maintain and enhance SWMBH's public image and to use the Internet in a productive manner.
- C. Personal use shall be conducted on the employee's personal time, and employees should minimize use of SWMBH equipment or systems to access the Internet or social media for personal use.
- D. All software used on SWMBH owned equipment shall be properly licensed to SWMBH.
- E. Employees who violate this policy may be subject to discipline, up to and including termination of employment.

**Purpose:** To outline the acceptable use of SWMBH network resources and social networking web sites. Additionally, this policy establishes guidelines and rules that specifically address individual roles, responsibilities and security for the company extranet.

**Scope:** SWMBH Employees

**Responsibilities:** SWMBH Employees

**Definitions:** None



## Standards and Guidelines:

### A. Introduction

1. Guidelines and restrictions have been established for using the Internet, social networking sites, and the SWMBH Extranet to ensure our employees are responsible and productive internet and social networking users.
2. Internet use is not considered private. Internet use through SWMBH equipment and/or systems will be logged and monitored. Log reports may be generated periodically to review usage and to enforce compliance. Employees should have no expectation of privacy in any use of the Internet or social media, even if for their own personal use, if conducted using SWMBH equipment or systems.

### B. USE OF INTERNET

#### 1. Acceptable Use of SWMBH Internet Access

The types of activities that are encouraged while using SWMBH equipment or systems to access the Internet include:

- a. Communicating with fellow employees, business partners of SWMBH and customers within the context of an individual's assigned responsibilities.
- b. Acquiring or sharing information necessary or related to the performance of an individual's assigned responsibilities.
- c. Participating in educational or professional development activities.
- d. Purchasing/shopping and other activities as stated in the users Essential Functions.

#### 2. Unacceptable Use of SWMBH Internet Access

Individual Internet use while using SWMBH equipment or systems must not interfere with others' legitimate use of the Internet. Users must not violate the network policies of any network accessed through their account. Internet use while using SWMBH equipment or systems must comply with all Federal and State laws, all SWMBH policies, and all other contracts. This includes, but is not limited to, the following:

- a. The Internet may not be accessed using SWMBH equipment or systems for illegal, unlawful or other improper purposes, including but not limited to, copyright infringement, political purposes, plagiarism, discrimination, harassment, intimidation, forgery, impersonation, gambling, solicitation, obscenity, libel, slander, fraud, defamation, personal shopping, pornography, computer tampering (i.e., spreading computer viruses). For more information regarding proper workstation use see SWMBH Policy 07.02 Workstation Use.
- b. The Internet may not be accessed using SWMBH equipment or systems in any way that violates SWMBH's policies, rules, or administrative orders including but not limited to, any applicable code of conduct policies. Use of the Internet in a manner that is not consistent with the mission of SWMBH, misrepresents SWMBH, or violates any SWMBH policy, is prohibited.
- c. Individuals may not view, copy, alter or destroy data, software, documentation or data communications belonging to SWMBH or another individual without authorized permission.
- d. Users will not load or install privately owned software on any SWMBH equipment or resource. Additionally, users are prohibited from downloading and installing software from the Internet without prior approval of the Chief Information Officer (CIO) or designee. Software is inclusive of screen savers, toolbars and system tray icons. Many viruses are written to look like a useful or cool program which, when running, can destroy anything you have access to. In addition,



a virus may setup your machine to be used for an attack on someone else at a later time. All files, programs, documents and zip files must be passed through virus protection programs prior to use. Failure to detect viruses may result in corruption or damage to files and/or unauthorized entry into SWMBH's computer network. It is mandatory to comply with copyright and trademark laws when downloading material from the Internet.

- e. If the user finds that any damage occurred as a result of downloading software or files, the incident should be reported immediately to the IT Department to prevent further damage to our systems.
- f. The above items may not be inclusive of all unacceptable uses of the Internet while using SWMBH equipment and systems. If a situation is unclear, staff must seek clarification through a senior leader. Senior leaders are required to notify and/or inform IT of any of these clarifications.
- g. Use of the internet for any purpose that is not work related.

#### C. SOCIAL NETWORK AND SOCIAL MEDIA SITES

1. There are many social networking and social media sites (i.e., Facebook, Twitter, Instagram, SnapChat, TikTok, YouTube, etc.) used by employees and even SWMBH at times for marketing and recruiting purposes. Access to these sites for SWMBH-related business shall be for conducting organizational business and not for personal use of social networking.
2. Do
  - a. Identify all copyrighted or borrowed material with citations and links and obtain permissions when necessary.
  - b. Post on behalf of SWMBH only with express permission of the appropriate officials at SWMBH. If you do not have such permission, you may not post on behalf of SWMBH.
  - c. Ensure that any posting made on behalf of SWMBH is accurate, truthful, and respectful and is spelled correctly with appropriate grammar, language and tone.
  - d. Use the same judgment in writing any postings made on behalf of SWMBH that you would in writing any formal letter. There may be occasions when you need specific permission before making a particular post – please make sure you have all necessary permissions before posting.
3. Do Not
  - a. Post anything on behalf of SWMBH or purporting to represent SWMBH or its position absent express and specific permission from the appropriate officials at SWMBH.
  - b. Put any customer-related information on a social network without a signed statement of release.
  - c. Post any content that could be characterized as defamation, plagiarism, harassment, advertising, a copyright violation or claims of special expertise or experience.
  - d. Post anything on behalf of SWMBH or purporting to represent SWMBH that would potentially embarrass you or SWMBH, or call into question your or the SWMBH's reputation, including photographs or other images.
  - e. Discuss SWMBH business or customers receiving services, unless SWMBH authorizes you to do so.
  - f. Use SWMBH logo or suggest you are writing on behalf of SWMBH, unless previously authorized by SWMBH.
  - g. The above items may not be inclusive of situations that arise with social network. If a situation



is unclear, staff must seek clarification through your senior leader.

4. Be aware that SWMBH's other policies may apply, including policies regarding:
  - a. Privacy and confidentiality
  - b. Monitoring
  - c. Harassment
  - d. Discrimination

**D. USE OF INTERNET, SOCIAL NETWORK, AND SOCIAL MEDIA SITES FOR PERSONAL USE**

1. Employees may of course use the Internet and social networking and social media sites on their own time and using their own equipment and systems. Please use good judgment while using the Internet for personal use and while participating in social networking. Remember, any content placed on the web is available for anyone to see for an indefinite length of time.
2. Employees may not use the Internet or social networking or social media sites, even for personal use, in any way that:
  - a. Discloses the Company's confidential or proprietary information, including any confidential information about SWMBH patients or consumers;
  - b. Discloses information that is protected from disclosure under law (e.g., someone's social security number or medical information);
  - c. Uses any SWMBH logo or trademark when doing so might lead someone to wrongly conclude that the employee is authorized to speak on behalf of SWMBH;
  - d. Is maliciously false;
  - e. In any way disparages SWMBH's operations, processes, products, services, employees, or former employees, or reflects poorly on you as an employee of SWMBH; or
  - f. May be viewed as pornographic, proprietary, harassing, or creating a hostile work environment, or otherwise violates a Company policy.
3. This policy does not, however, prohibit lawful interaction and discussion among employees, including on social media, regarding SWMBH's employment policies or practices or the employees' wages, hours, and other terms and conditions of employment.

**E. Southwest Michigan Behavioral Health Extranet**

1. The purpose of the SWMBH extranet (Share Point Portal) is to share data and information with trading partners, contractors, and SWMBH staff. The same safeguards and use guidelines apply to the extranet as for Internet and Social Networking/Social Media Use.
2. Use of the extranet shall be limited to work roles and responsibilities and maintained in SWMBH IS/IT.
3. All security rules apply. Privileges will be granted based upon business need, authorized by the individuals' supervisor, and created by SMBH IS/IT. Non-EEs and non-CMH credentials will be expired within 90 days. Extensions may be requested.

**Procedures:** None

**Effectiveness Criteria:** None

**References:** None

**Attachments:** None

