

# ORGANIZATIONAL PROCEDURE

<b>PROCEDURE # 3.1A</b>	<b>EFFECTIVE DATE</b>	<b>REVISED DATE</b>
<b>TITLE: DATA MANAGEMENT AND SYSTEM SECURITY</b>	<b>January 1, 2014</b>	<b>February 9, 2024</b>
<b><u>ATTACHMENT TO</u></b>	<b>REVIEW DATES</b>	
<b>POLICY #: 3.1</b>	8/21/14, 10/31/17, 9/1/2020, 12/12/2021, 2/9/2024	
<b>POLICY TITLE: DATA MANAGEMENT AND SYSTEM SECURITY</b>		
<b>CHAPTER: INFORMATION MANAGEMENT</b>		

## I. PURPOSE

To establish a procedure to secure and protect electronic data used by the Lakeshore Regional Entity (LRE) staff and personnel and Member Community Mental Health Service Program (CMHSP) approved access users.

## II. PROCEDURES

Request for Access to LRE Systems

- A. The individual requesting access will send a written request or submit a technical support ticket to the Chief Information Officer (CIO), or individual(s) designated by the CIO for granting system access, specifying the system needed and stating the reasons for need of access.
- B. The CIO or designee will evaluate the request determining the need for access consistent with user role-based functions and tasks and appropriate non-disclosures and trainings. Requests for access to data that contains PHI will require documentation of LRE Privacy training and attestation prior to approval.
- C. The CIO or designee will refer the applicant to the most appropriate (LRE or CMHSP) training resources to complete the necessary trainings and documentation. All supporting documentation will be maintained on the LRE SharePoint site.
- D. The CIO or designee will approve system access upon confirmation of completion of required training and attestations. The CIO or designee may grant access and admittance for LRE ROAT group members at the request of the CMHSP CEO without requiring a signed access request form.
- E. Information systems management will maintain an updated log of individuals that have access to systems.

## III. APPLICABILITY AND RESPONSIBILITY

The procedure applies to LRE staff, Member CMHSPs, and other external users approved for access to LRE systems.

## IV. MONITORING AND REVIEW

The Chief Information Officer, in conjunction with the Chief Executive Officer, will review the procedure on an annual basis.

**V. DEFINITIONS**

N/A

**VI. RELATED POLICIES AND PROCEDURES**

- A. LRE Information Management Policy and Procedures
- B. LRE Compliance Policy and Procedures
- C. LRE Compliance Plan

**VII. REFERENCE/LEGAL AUTHORITY**

- A. Balanced Budget Act 1997
- A. HIPAA Act 1996
- B. HITECH Act 2009
- C. MDHHS Medicaid Specialty Supports and Services Contract

**VIII. CHANGE LOG**

Date of Change	Description of Change	Responsible Party
12/16/21		CIO
02/09/24	Language updates	CIO