

 <p><b>SPOKANE COUNTY</b> Regional Behavioral Health Organization Prepaid Inpatient Health Plan</p>	<b>Policy Title:</b> <b>Password Management, Person or Entity  Authentication, Access Control – Unique  User Identification</b>		<b>Policy #</b> <b>MIS -  41</b>
	<b>Signature:</b> 	<b>Revised:</b> April 1, 2016	
	Christine Barada, Director Community Services, Housing and Community Development Department	<b>Reviewed:</b> 	
	<b>Signature Date:</b> 2/1/16	Signing by authority of Res. No. 2007-0038	

Applies to:  Internal  External

### References

State Pre-Paid Inpatient Health Plan Contract (PIHP)  
45 Code of Federal Regulations (CFR) 164.308(a)(5)(ii)(D) Password Management  
45 CFR 164.312(a)(2)(i) Access Control – Unique User Identification  
45 CFR 164.312(d) Person or Entity Authentication

### Scope

The Spokane County Community Services, Housing, and Community Development Department (CSHCD), Spokane County Regional Behavioral Health Organization (SCRBHO), and its network providers.

#### **1. Policy**

- 1.1. Password Management - All passwords in use at CSHCD and/or in use by the SCRBHO system users conforms to a specific set of guidelines as set forth in this policy. This will help to keep passwords safe and secure.
- 1.2. Other Related Policies:
  - 1.2.1. Spokane County Information Systems Department (ISD): Password Policy
- 1.3. Person or Entity Authentication – All system users of the CSHCD and/or SCRBHO's Information Systems (IS) must follow the various guidelines for person or entity authentication to maintain security and integrity of the system at all times.
- 1.4. Access Control – Unique User Identification – The SCRBHO IS Security Officer ensures that the SCRBHO's information systems implement a unique user identification system that permits access to SCRBHO's information resources only by those persons with appropriate authorization.

**\*Note: Where policy language differs, Spokane County ISD Policy and Procedures take precedence.**

## **2. Procedure**

### **2.1. Password Management**

- 2.1.1. The password policy requires all CSHCD and/or SCRBHO system users to maintain the privacy of their password, and be accountable for the unauthorized use and negligent disclosure of their password. As a CSHCD and/or SCRBHO system user, your password must meet “complexity requirements” and conform to the following guidelines:
  - 2.1.1.1. Passwords should be a minimum of eight (8) characters in length;
  - 2.1.1.2. Passwords must contain 3 of the following 4 types of characters, and preferably all 4 types of characters:
    - 2.1.1.2.1 Lower case alpha characters: a to z;
    - 2.1.1.2.2 Upper case alpha characters: A to Z;
    - 2.1.1.2.3 Numeric characters: 0123456789; and
    - 2.1.1.2.4 Special characters (examples include: ! @ # \$ % ^ & \* ( ) ? < > { } [ ] “ ”)
  - 2.1.1.3 Passwords should not be part of your logon name or be consecutive in any manner (an example of consecutive would be ABCDE123).
  - 2.1.1.4 Passwords should not be the name of a pet, spouse, child, parent, sports team, school attended, hobby, or other information that a person who knows the user might guess;
  - 2.1.1.5. Passwords should be a word or sequence of letters and numbers that the user can remember but could not be easily guessed by even a close friend of the user;
  - 2.1.1.6. Passwords should never be written down;
  - 2.1.1.7. Passwords should never be given to other staff members;
  - 2.1.1.8. Raintree password changes are set to occur every ninety (90) days, and current or previous passwords should not be re-used; and
  - 2.1.1.9. SCRBHO’s network password changes and frequency are governed by Spokane County ISD. SCRBHO’s IS Security Officer sends 90 day reminders to all CSHCD staff members to change their network passwords in accordance with this policy.
- 2.1.2. The SCRBHO IS Security Officer reviews Raintree password policies with all CSHCD and/or SCRBHO employees during new employee orientation. SCRBHO IS Help Desk ensures system users have indicated on the Oath of Confidentiality form they have reviewed and understand the SCRBHO’s Password Management, Person or Entity, Authentication,

Access Control – Unique User Identification policy and procedures associated with the Raintree system.

2.1.3. The SCRBHO IS Security Officer monitors Raintree system password usage and identifies any patterns that suggest password policies and guidelines are not being followed.

2.1.4. The SCRBHO IS Security Officer requires staff members who frequently lose or forget their passwords to be coached regarding preventing this practice and/or to complete refresher training on the correct use of passwords.

2.2. Person or Entity Authentication

2.2.1. CSHCD and/or SCRBHO system users must use their passwords when logging on to the SCRBHO's information systems.

2.2.2. CSHCD and/or SCRBHO system users may not use another staff member's user name and password to access the SCRBHO's information system.

2.2.3. CSHCD and/or SCRBHO system users must change their passwords when they become known to others.

2.2.4. CSHCD and/or SCRBHO system users should change their passwords as required by Spokane County ISD, and prompted by SCRBHO's IS Security Officer and the Raintree system (every 90 days), and not so frequently that they are likely to be forgotten.

2.2.5. CSHCD and/or SCRBHO system users should change their passwords if they have been compromised in any way.

2.3. Access Control – Unique User Identification

2.3.1. Every SCRBHO system user authorized to use SCRBHO's information system is given a unique user name and selects a password known only to the system user. System users must use their user name and password when using the SCRBHO information systems and accessing Protected Health Information (PHI).

3. **Monitoring**

3.1. The SCRBHO will monitor the providers corresponding policy through the annual contracted provider monitoring, with the appropriate recommendations, findings and/or corrective actions required in performance improvement projects.