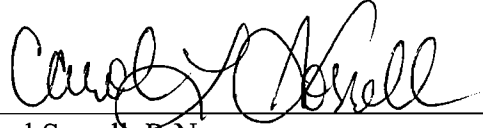
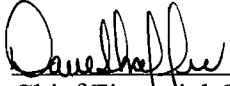

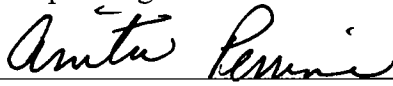
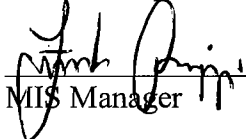


**KERN HEALTH SYSTEMS
POLICIES AND PROCEDURES**

SUBJECT: Analog Line Security Policy		INDEX NUMBER 7.07		Page 1 of 3	
SECTION MIS		ISSUE DATE <i>April 3, 2006</i>			
Review Date					
Effective Date					
Revision No.					

Approved		Date	<i>4/3/06</i>
	Carol Sorrell, R.N. Chief Executive Officer		
Approved		Date	<i>3/22/06</i>
	Chief Financial Officer		
Approved		Date	<i>3/13/06</i>
	Chief Operating Officer		
Approved		Date	<i>3/20/06</i>
	Chief Compliance Officer		
Approved		Date	<i>2/24/06</i>
	MIS Manager		

POLICY¹:

This policy explains Kern Health Systems (KHS) analog line acceptable use and approval policies and procedures. This policy contains two distinct uses of analog lines, lines that are to be connected for the sole purpose of fax sending and receiving, and lines that are to be connected to computers.

PURPOSE:

This policy covers only those lines that are to be connected to a point inside the KHS building. It does not pertain to phone lines that are connected into employee homes, PBX desktop phones, and those lines used by MIS for emergency and non-corporate information purposes.

PROCEDURE:

1.0 Scenarios and Business Impact

There are two important scenarios that involve analog line misuse, which we attempt to guard against through this policy. The first is an outside attacker who calls a set of analog line numbers in the hope of connecting to a computer that has a modem attached to it. If the modem answers (and most computers today are configured out-of-the-box to auto-answer) from inside KHS

**KERN HEALTH SYSTEMS
POLICIES AND PROCEDURES**

SUBJECT: Analog Line Security Policy	INDEX NUMBER 7.07	Page 2 of 3
--------------------------------------	----------------------	-------------

premises, then there is the possibility of breaching KHS internal network through that computer, unmonitored. At the very least, information that is held on that computer alone can be compromised. This potentially results in the loss of Protected Health Information (PHI).

The second scenario is the threat of anyone with physical access into KHS facility being able to use a modem-equipped laptop or desktop computer. In this case, the intruder would be able to connect to the trusted networking of KHS through the computer's Ethernet connection and the call out to an unmonitored site using the modem, with the ability to siphon KHS information to an unknown location. This could also potentially result in the substantial loss of vital information.

2.0 Computer-to-Analog Line Connections

The general policy is that request for computers or other intelligent devices to be connected with analog lines from within KHS will not be approved for security reasons. Analog lines represent a significant security threat to KHS, and active penetrations have been launched against such line by hackers. Waivers to the policy above will be granted on a case by case basis by Executive staff.

2.1 Requesting an Analog Line

Once approved, the individual requesting an analog line must provide the following information to MIS:

- A. A clearly detailed business case of why other secure connections available at KHS cannot be used
- B. The business purpose for which the analog line is to be used
- C. The software and hardware to be connected to the line and used across the line and to what external connections the requestor is seeking access

The business case must answer, at a minimum the following questions

- A. What business needs to be conducted over the line?
- B. Why is a KHS equipped desktop computer with Internet capability unable to accomplish the same tasks as the proposed analog line?

In addition, the requestor must be prepared to answer the following supplemental questions related to the security profile of the request:

- A. Will the machines that are using the analog lines be physically disconnected from KHS internal network?
- B. Where will the analog line be placed? A cubical or office?
- C. Is dial-in from outside KHS needed?
- D. How many lines are being requested, and how many people will use the lines?
- E. How often will the line be used? Once a week, two hours per day?
- F. What is the earliest date the line can be terminated from service? The line must be terminated as soon as it is no longer in use.
- G. What other means will be used to secure the line from unauthorized use?
- H. Is this a replacement line from an old location? What was the purpose of the original line?

**KERN HEALTH SYSTEMS
POLICIES AND PROCEDURES**

SUBJECT: Analog Line Security Policy	INDEX NUMBER 7.07	Page 3 of 3
--------------------------------------	----------------------	-------------

- I. What types of protocols will be run over the line?
- J. The requestor should use the Help Desk process to address these issues and submit a request to MIS

3.0 Enforcement

Any employee found to have violated this policy may be subject to disciplinary action, up to and including termination of employment.

¹ **Revision 2006-04:** Developed to comply with HIPAA Security Policy §164.310(a)(2)(ii), 164.310(b) and 164.31(c).