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## Information Systems Change Control Policy

## Policy 5010

### Purpose

Configuration change control involves the systematic proposal, justification, implementation, test/evaluation, review, and disposition of changes to Bullhook Community Health Center (BCHC) information systems, including upgrades and modifications. Without system change control, the potential exists that changes could be made to the information system and/or networks that, either intentionally or unintentionally, degrade the security of the information system, subjecting BCHC, Inc. to a greater degree of risk, including a potential breach of Protected Health Information (PHI).

### Scope

This Systems Change Control policy applies to all information systems and information system network components of BCHC, Inc. specifically, it includes:

- Servers and other devices that provide centralized computing capabilities.
- SAN, NAS and other devices that provide centralized storage capabilities.
- Wireless networks
- Desktops, laptops and other devices that provide distributed computing capabilities.
- Routers, switches and other devices that provide network capabilities.
- Firewalls, IDP sensors and other devices that provide dedicated security capabilities.
- Malware protections
- Upgrades to electronic health records (EHR) and practice management (PM) software

### Policy

1. Non-emergency changes to an information system must be fully documented and authorized, and must be performed in a controlled manner. Changes to information systems may only be made by appropriate systems administrator personnel that have approved access privileges.
2. Emergency changes to an information system must be at least minimally documented and authorized by the BCHC CEO. Emergency changes must be performed in a controlled manner.



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Changes to information systems may only be made by appropriate systems administrator personnel that have approved network privileges.

3. Non-emergency information system changes will be assessed for their potential security impact prior to being implemented. If the security impact increases the risk that must be accepted by BCHC, the changes that are being requested must be revised, or alternate security mitigation controls must be put in place prior to any change being made.

4. Emergency information system changes will be assessed for their potential security impact. If the security impact of the proposed changes increase the risk that must be accepted by BCHC, an alternative change must be reviewed and evaluated for appropriateness. If the alternative solution is acceptable, the emergency change documentation must be changed to reflect the alternate security mitigation controls that will be put into place.

### **Controlling Changes**

To properly control information systems changes, change requests must be made formally to allow for thorough review. These change requests must be submitted to the CEO and CIO. Change request documentation will be thoroughly reviewed and accepted by the CEO before changes are made. Significant systems changes may be reviewed by the BCHC Management Team prior to being approved, e.g. EHR upgrades.

Once systems changes have been made, systems documentation must be updated to reflect the changes.

### **Assessing Risks of Systems Changes Prior to Initiation of Changes**

Prior to completing implementation plans, risks to the BCHC network and/or information systems associated with implementing the requested change(s) must be assessed and any significant risks must be mitigated. If risks to the BCHC network or systems cannot be mitigated, changes will not be made.

### **Non-Compliance**

Only authorized system administrators may make approved systems and network changes. Violation of any of the constraints of this policy or change control procedures will be considered a security breach. Depending on the nature of the violation, and whether or not a breach of PHI has occurred, various sanctions may be taken.



# BULLHOOK

Community Health Center

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References:

1. SANS.org
2. Info-Tech Research Group
3. HIPAA Security Regulation

  
\_\_\_\_\_ Date: 2-12-18

CHIEF EXECUTIVE OFFICER

  
\_\_\_\_\_ Date: 2/12/2018

CHAIR, BOARD OF DIRECTORS

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