Liberty Healthcare Corporation and Affiliates (Liberty) Standard Operating Policies

Title:	**ISF 1.0 – Information Security Framework**	**Effective Date:**	**12/28/2020**
Author:	**Haroon Ahmad**	**Last Review Date:**	**12/22/2021**
Location:	**All Locations**	**Last Revision Date:**	**12/22/2021**
Functional Area:	**All Areas**		

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1.0   INFORMATION SECURITY FRAMEWORK

1.1   PURPOSE

The Liberty Healthcare Corporation Information Security Framework (ISF), and the individual information security policies contained therein, are designed to centralize and define baseline standards and operational policies relevant to all Liberty Healthcare Corporation and its affiliates (Liberty) information technology systems and data management. Liberty is committed to maintaining a high level of security to include confidentiality, integrity, and availability for all stakeholders including, but not limited to, our employees, clients, customers, vendors, partners. Liberty is also committed to ensure the privacy of all individuals by strictly adhering to the federal HIPAA guidelines and other regulatory requirements at the federal, state and local levels.

1.2   SCOPE

Liberty's ISF and related policies are applicable to all contracts, programs, assets, and employees within Liberty Healthcare Corporation and its affiliates, and are designed to support and be integral to Liberty's broader standard operating policies and procedures.

1.3   POLICY

1.3.1   REGULATORY REQUIREMENTS

Liberty commits to ensure adherence to all federal, state, and local regulatory information security requirements, where applicable.

Liberty considers compliance with Health Insurance Portability and Accountability Act (HIPAA) of 1996, a core responsibility and adheres to the standards set forth in all operation aspects of the company.

Liberty ISF and Information Technologies are also designed to support adherence to the NIST 800-53 Rev. 4 framework titled Security and Privacy Controls for Federal Information Systems and Organizations.

1.3.2   CONTRACTUAL OBLIGATIONS

Liberty's ISF is also guided by various contractual obligations. Liberty contracts with many states and local governments throughout the United States. Many of these contracts include specific security requirements. Where appropriate, these requirements are addressed within the ISF, and applicable across the entire enterprise, while narrower or unique items may be identified within individual program documentation.

1.3.3   POLICY REVIEW REQUIREMENTS

The ISF and related policies are required to be reviewed and updated on an annual basis. All policies and any subsequent attachments must be reviewed by the Information Security Officer as well as any relevant process owners to ensure accuracy and applicability of all policies. A revision history of all changes made must also be tracked for all documents. Additionally, each policy must be approved by the Information Security Officer (ISO) and Chief Information Officer (CIO) for publication.

1.3.4   TRACK AND REVIEW INTERNAL CONTROLS

The Liberty ISO is required to compile and maintain a list of all valid internal controls applicable to the entire corporation, as well any unique controls specific to individual programs, contracts, or company locations. This list of internal controls includes control owners, frequency of control use, as well as performance indicators where possible. The list of internal controls must also be reviewed annually to detail any changes, maintain accuracy, as well as ensure the internal controls are operating effectively.
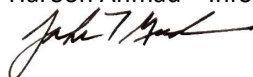
1.3.5   ISF POLICY LIST

1.0   – Information Security Framework
2.0   – Data Management Policy
3.0   – Acceptable Use Policy
4.0   – Access Management Policy
5.0   – Risk Management Policy
6.0   – Incident Management Policy
7.0   – Application Development Policy
8.0   – Business Continuity Plan Policy
9.0   – Vendor Management Policy
10.0   – Physical Security Policy
11.0   – System Security Policy

APPROVALS

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Haroon Ahmad – Information Security Officer

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John T. Guda – CIO / CTO

REVISION HISTORY

Version	Date	Author	Summary of Changes
1.0	12/28/2020	Haroon Ahmad	Initial ISF release – refactor and update of previous security policies into distinct documents
2.0	12/22/2021	Haroon Ahmad	Annual Review. No Major Changes. Added inactivity lock requirement