Assessment Area
Unite Us Contract – Closed-Loop Referral System

BACKGROUND

Pandemic isolation, which can be detrimental to those with SUD, has resulted in limited provider availability and restricted access to other services. Implementing a closed-loop referral system is a critical component in the State's pandemic response efforts to ensure the health and wellbeing of its citizens.

PURPOSE

The purpose of this initial Risk Assessment is to review the draft contract to ensure DHHS Information Security and Privacy requirements and Agreements are included, such as:

- Method of Secure Data Transmission
- Secure Retention and Disposition of Department Data
- Security / Privacy Incident and Breach Reporting
- System and Data Security Safeguards
  - Proper security control management
  - Protection of Department data throughout the information lifecycle regardless of the media used to store the data (i.e., tape, disk, paper, etc.).
  - Authentication and access controls to contractor systems that collect, transmit, or store Department confidential information where applicable.
  - Proper security monitoring capabilities are in place to detect potential security events that can impact State of NH systems and/or Department confidential information for contractor provided systems.
  - Compliance with all applicable State of New Hampshire and Department system access and authorization policies and procedures, systems access forms, and computer use agreements as part of obtaining and maintaining access to any Department system(s). Agreements will be completed and signed by the Contractor and any applicable sub-contractors prior to system access being authorized.
  - Storage, administrative or functional access of any State of New Hampshire or Department data will knowingly or unknowingly occur offshore or outside the boundaries of the continental United States unless prior express written consent is obtained from the Information Security Office leadership member within the Department.
  - Access to the Department Data obtained under the Contract is limited to only those authorized End Users who need such DHHS Data to perform their official duties in connection with purposes identified in this Contract.
  - Contractor ensures oversight and compliance of their End Users to the contract terms and agreements. DHHS reserves the right to conduct onsite inspections to monitor compliance with this Contract, including the privacy and security requirements provided in herein, HIPAA, and other applicable laws and Federal regulations until such time the Confidential Data is disposed of in accordance with this Contract.

RECOMMENDATIONS

- Information Security approves contract to move forward. Contract language meets information security and privacy requirements.
- Conduct a six-month Security Risk Assessment for contractor compliance in June 2021.

TOP ISSUES (I) & RISKS (R)

No issues or risks were identified.

Elizabeth Gillett

Elizabeth Gillett,
DHHS Deputy Information Security Officer

September 20, 2020

Date