


Security and Accreditation Statement

Two copies: one must be stored on site and the other copy in the HousingWorks offices

PREAMBLE: HousingWorks verifies that, as a company granted access to Personally Protected Information (PPI), it has the capacity to protect such PPI consistent with Massachusetts Regulation 201 CMR 17.00, as well as applicable federal regulations. The purpose of this document is to affirm that we have a written comprehensive security program that that complies with the Massachusetts Regulations. Compliance with these regulations means:

- 1) that we having the required protections in place; and
- 2) that we have a set of documents, polices, and certification forms that serve to educate and remind your staff – and our users - about the components of a security program. This helps ensure that the compliance is maintained over time. Forms pertinent to you as a user are included in the written resources we provide you when you subscribe to our service.
- 3) that the third party service providers we work with also hold or, to exceed these standards, and that they, too, have written guidelines to maintain compliance. For your information: our third party providers are NuCivic, GovDelivery, and RIMU <http://rimuhosting.com/index.jsp> - each of whom handles client information for countries, banks, US federal and state gov't agencies, and for multi-national private companies where security concerns are paramount.

Sincerely



John LaBella
President
HousingWorks.net

P.O. Box 231104
Boston, MA 02123

For your convenience, a copy of the 201 CMR language follows on the last pages of this document.

User Compliance Forms 1-3 (you must sign and initial all three)

Initial every Item, then fax this page to 617-536-8561.

This section details the Security and Practices procedures in force on the HousingWorks website. Some procedures are one you must simply acknowledge - but others are procedures to which you must agree and to which you must adhere in order to gain access to the system.



Form 1 - Procedures for System Security

The following procedures have been implemented to be compliant with **201 CMR 17.00: Standards for the Protection of Personal Information of Residents of the Commonwealth**. - to which you must agree - are required by state law. This document outlines HousingWorks' - and your offices - commitment to protect its clients' personal information - and be compliant with - 201 CMR 17.00: Standards for the Protection of Personal Information of Residents of the Commonwealth.

We understand and agree

User Initials

Every user of the HousingWorks web application is issued a separate username.

HW and users must observe a strong password policy. Users are required to use passwords of at least 12 characters including 1 number and one symbol (?, / , _ , ! , # , \$, @ , & , *); passwords are required to be changed every 120 days, and **passwords may not be reused.**

User accounts are disabled after 120 days of inactivity. Contact HousingWorks to re-activate these. If new staff, HousingWorks must eliminate the old account and create a new one.

User access is blocked for 6 hours after 4 unsuccessful login attempts. Subsequent login failures within a 24 hour period result in indefinite account blockage. Such account blockages require an administrators approval to re-enable the account.

Access to office staff usage is logged and periodically reviewed to ensure compliance with usage guidelines.

The website includes links to our *Terms of Use* and *Privacy Policy*

Furthermore, all database entries with the following information are encrypted:

- Name
- Address
- Telephone number
- Email address
- Financial information such as income amounts, income sources, and financial institutions
- Social Security and Driver's License numbers
- Medical information such as disability or disease status
- Gender and sexual orientation status

Form 2 - Office Procedures

Two copies: one must be stored on site and a copy in the HousingWorks offices



The following procedures - to which you must agree - are either required by state law or by HousingWorks in order to protect all parties from lawsuit. This document outlines your offices commitment to:

1. protect its clients' personal information; and
2. maintain the accuracy of the information stored in the system.

_____ Communications with HousingWorks containing client names, SSNs, DOB and other identifying information must be faxed – never emailed.

_____ All applicants may only submit changes to their information on official forms and these must be signed and dated.

_____ It is unacceptable to submit a note, post it , fax, or email requesting a client update, unless that is accompanied by documents signed and dated by the applicant showing the changes to be made

Form 2 - Procedures for Hosting and Maintenance of the Website

Two copies: one must be stored on site and a copy in the HousingWorks offices



The following procedures have been established with regards to the hosting and maintenance of the website:

- The website is hosted on a dedicated Virtual Private Server (VPS) in a secure data center. Administrative access to this VPS is restricted to development staff only, and all such connections are recorded in the servers logs.
 - This system is monitored regularly to ensure that its firewall rules are up to date and that all system security releases are applied.
 - The VPS is backed up daily. Those backups are encrypted and stored on separate hardware in a high-security data center.
 - Disaster Recovery: Data is co-located on two continents (Dallas, TX and London, England)
- The website itself is stored on an encrypted disk partition on the VPS. Furthermore, all database entries with the following information are encrypted:
 - Name
 - Address
 - Telephone number
 - Email address
 - Financial information such as income amounts, income sources, and financial institutions
 - Social Security and Driver's License numbers
 - Medical information such as disability or disease status
 - Gender and sexual orientation status

Furthermore, all HousingWorks employees and advocates are trained in the proper use, storage, and handling of personally identifiable information, and are required to sign forms indicating their understanding of those procedures and the consequences of violating those policies.

This policy is in effect as of 12/28/2014 and will be reviewed annually by the HousingWorks board

- We require full end-to-end TLS encryption for users connecting to the website.
http://en.wikipedia.org/wiki/Transport_Layer_Security
- Users are granted access privileges that correspond with their job or role responsibilities.
 - Office Users are only allowed to access data directly connected to their user account
 - Advocates are allowed to view client data for clients assigned to them.
 - Administrators are allowed to view all data; administrator access is limited to the Director of HousingWorks and the site's system administrator.

_____ Initials of Office Manager: We may not understand the words but we understand (as laypersons) the intent.