Policy		
Category Human Resources	**Orig. Effective Date** 10.1.2018	**Revised & Effective** 11.10.2018
Policy # 12380.2	**Pages** 13	

TITLE	*Telework / Telecommuting Policy*

PURPOSE   To provide guidelines for telework / telecommuting by Baptist Health employees.

SCOPE   Baptist Healthcare System, Inc. [BH] hospitals*, Baptist Health Medical Group [BHMG], and all entities or affiliates of which BH is the sole member.

AUTHORIZATION   Chief People and Culture Officer

DEFINITIONS

Ad Hoc Telework   An employee does not have a defined telework arrangement. The employee may telework occasionally or telework for a limited period of time.

Central Worksite   An employee's officially assigned workstation (home unit).

Regular Telework   An employee who works at a centrally located worksite for most their work schedule and works from home or an approved alternate worksite on approved and specified days and/or hours.

Remote Access   An employee's ability to connect via high-speed internet from the designated Telework Site to the Baptist Health computer system and access the programs needed to effectively work.

Telework Administrator   A manager or designee who is responsible for maintaining the Telework Agreement for the department or unit.

Telework Agreement   The agreement contains the terms and conditions of an employee's teleworking arrangement.

Telework Site   An approved alternative worksite.

BH hospitals include: Baptist Health Corbin, Baptist Health Floyd, Baptist Health La Grange, Baptist Health Lexington, Baptist Health Louisville, Baptist Health Madisonville, Baptist Health Paducah, and Baptist Health Richmond.

Telework Program	BH's *Telework/Telecommuting Policy* (and appendices thereto), which allow eligible employees to work from home or from a structured offsite facility under certain terms and conditions.
Telework Site Safety Checklist	A form to be used to assess the readiness of an employee to work offsite in a safe, healthy, and ergonomically-sound environment.

POLICY

BH offers an opportunity to work from home or from a structured offsite facility, when doing so is advantageous to both the employee and the organization. Telework is not a benefit, entitlement, right or reward. It is a mutually agreed-upon work option between BH and its employee(s) which directly or indirectly results in enhanced organizational performance and employee satisfaction.

Telework may not be suitable for all employees and/or positions. Generally, the following factors should be considered when assessing whether a Telework Agreement is appropriate:

- Whether the employee can work independently, is self-motivated and flexible;
- Whether face-to-face interaction with staff or management is necessary; Whether and how employee output/productivity can be monitored; and
- Equipment needs, work space design considerations, and scheduling issues.

Telework is voluntary unless specifically stated as a condition of employment. Decisions to offer teleworking and approval of telework applications are based strictly on business needs and are in the Telework Administrator's (generally the teleworkers supervisor/manager) discretion.

Telework Administrators (generally the teleworkers supervisor/manager) are requested to make a determination on the acceptance of a submitted Telework Agreement in accordance with existing guidelines established for scheduling employees within their respective department(s). Employees applying for Telework must be familiar with and agree to follow all related BH IT Security policies and procedures. All such policies and procedures are noted below (see **Security** heading).

*Approval of Telework Agreement***:** An approval is granted upon receipt of a Telework Agreement with the signature of the Telework Administrator.

The final signed, original Telework Agreement is to be given to Human Resources to be placed in the employee's personnel file.

Termination of a Telework Agreement: BH, the Telework Administrator, or the employee may cancel the Telework Agreement with or without cause at any time. The cancelling party should make every effort to provide sufficient and reasonable notice of the change so that business and personal adjustments can be made and affected parties can be notified.

BH hospitals include: Baptist Health Corbin, Baptist Health Floyd, Baptist Health La Grange, Baptist Health Lexington, Baptist Health Louisville, Baptist Health Madisonville, Baptist Health Paducah, and Baptist Health Richmond.

Managers will document their rationale for withdrawing the Telework Agreement to include an indication as to whether there is an opportunity for reinstatement. A copy of the documentation will be sent to the employee and to Human Resources for placement in the personnel file.

Travel: Absent the situations listed below, a teleworker's normal commute from his or her home to a designated Telework Site or Central Work Site where they then begin their workday or their return travel to their home at the end of the workday is generally not considered compensable time. However, if a non-exempt teleworker has already started their workday at home (or another Telework Site) and are required to travel to the Central Work Site, such travel time is compensable worktime. In such cases, the Company will pay the non-exempt teleworker his or her normal base wage (including overtime pay if applicable) for any time required to commute from one location to another. Similarly, if a non-exempt telework returns home (or travels to another Telework Site) from the Central Work Site and continues to work, such travel time is also compensable worktime for which the non-exempt teleworker will be paid. In all cases, the telework will be solely responsible for any mileage or other expenses incurred because of any travel between the Telework Site and the Central Work Site. Any exceptions to the above must be approved by Human Resources.

Terms of Employment

The teleworker's terms of employment shall remain the same as those for non-telework employees. Employee salary, benefits and employer-sponsored insurance coverage shall not change because of a telework arrangement.

All BH policies, rules and practices shall apply at the Telework Site, including those governing communicating internally and externally with the public, employee rights and responsibilities, facilities, and equipment management, financial management, information resource management, purchasing of property and services, privacy, security and safety. Failure to follow policies, rules and/or procedures may result in the termination of the telework arrangement and/or disciplinary action up to and including termination of employment.

Injuries sustained by the employee while at his or her Telework Site and in conjunction with his or her regular work duties may be covered by the BH's workers' compensation policy. Employees must report any work-related injuries to the supervisor or Telework Administrator immediately, but no later than 24 hours after such injury. Employee agrees that it may be necessary for BH to visit employee's Telework Site to investigate any work-related injuries.

Scheduling Telework

Employees accepted into the Telework Program will work with their manager to determine the best scheduling option that will meet the needs of the work unit.

BH hospitals include: Baptist Health Corbin, Baptist Health Floyd, Baptist Health La Grange, Baptist Health Lexington, Baptist Health Louisville, Baptist Health Madisonville, Baptist Health Paducah, and Baptist Health Richmond.

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Telework Guidelines

Regular Telework: The employee can be scheduled for as many days of telework during the course of a work week as deemed appropriate by the employee and the Telework Administrator. An approved and consistent schedule is recorded in the Telework Agreement. This form of remote access is through a BH-configured and supplied workstation or laptop, and VPN connectivity with a firewall.

Ad Hoc Telework: Most often temporary and established for a limited period of time. It is for that reason that employees assigned to telework under this category may receive limited advance notice and that the days worked may vary from one work week to the next. Ad Hoc Telework may include unplanned telework such as on inclement weather days. Ad Hoc Telework includes the use of remotely available system resources such a remote desktop access, virtual desktop, and email and other online productivity tools. Employees utilizing this form of telework are allowed to use their own personal systems but still must adhere to the privacy and security requirements for protecting ePHI and other BH proprietary data. For *unplanned* Ad Hoc Telework (e.g., due to inclement weather), an executed Telework Agreement will not be required. For *planned* Ad Hoc Telework that does not conform to a consistent schedule (e.g., employee will telework at least 4 days per month but the exact days and weeks may vary), a Telework Agreement should be completed.

Please refer to BH policy, *Remote Access Policy* [HIPAA Security] for more detailed specifications.

Telework Approval Process

A recommended guideline for the approval of a Telework Agreement must be consistent with the existing scheduling guidelines established for your respective department(s). The steps to the approval process are as follows:

- The Telework Administrator completes the *Managing and Successfully Participating in Telework at Baptist Health (mandatory training module),* offered through DevelopYou located on BEN, prior to discussions with employees regarding the Telework Program.
- Employees interesting in a **Regular Telework** arrangement similarly complete the *Managing and Successfully Participating in Telework at Baptist Health (mandatory training module),* offered through DevelopYou on BEN, prior to the submission of a Telework Agreement. A Certificate of Completion of this course must accompany any documentation (e.g., Telework Agreement, Telework Site Safety Checklist) submitted towards participation in the Telework Program.
- The employee completes and submits the signed *Baptist Health System Telework Application and Safety Checklist Agreement* to the Telework Administrator.

BH hospitals include: Baptist Health Corbin, Baptist Health Floyd, Baptist Health La Grange, Baptist Health Lexington, Baptist Health Louisville, Baptist Health Madisonville, Baptist Health Paducah, and Baptist Health Richmond.

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- If approved, the Telework Administrator will sign the Agreement and submit all documents to their local HR department.

While not a part of the approval process, the operating unit's Human Resources department will, on a quarterly basis, review a list of program participants. This will allow HR and the Senior Leadership team to have an opportunity to assess the fairness and consistency within which the Telework Program has been implemented within BH.

Telework Accessibility

The teleworker is expected to be reachable via telephone, fax, pager (if applicable), text, and/or email during agreed-upon work hours or specific core hours for accessibility. The manager and teleworker will agree on how to handle communications including telephone messages, the feasibility of call forwarding, the frequency of checking telephone and email messages, and the need for having a phone designated at the Telework Site for answering during established hours of work.

Dependent/Elder Care

Teleworkers will not act as caregivers for dependents/elders during work hours if the teleworker is on a **Regular Telework** schedule. This does not mean that dependents/elders have to be absent from the home or designated Telework Site during work hours. It means that dependents/elders should not require the teleworker's entire attention during work hours. Employees on an **Ad Hoc Telework** schedule may participate in the care of dependents/elders as long as that care allows for work to be completed.

Teleworkers follow the same workplace rules that non-teleworkers follow in regards to leaving the workplace and accounting for time for non-work related appointments such as doctors' visits. It is preferable for an employee who is ill to take PTO/EIB to rest and get well instead of teleworking. If business needs require the ill employee to telework in lieu of PTO/EIB, a discussion with the supervisor should occur to explain the situation.

Work Requirements

An employee approved for the Telework Program must adhere to the following requirements:

- Accurately record actual time worked.
- Obtain the Telework Administrator's advanced written approval for overtime work.
- Work the requisite number of hours required for the position or agreed-upon
- Maintain excellent customer service, employee productivity and work progress.
- Attend job-related meetings, training sessions, and conferences as necessitated by their work and/or at the request of management.

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- Be reachable via telephone, fax, pager (where applicable), text, and/or email during agreed-upon work hours or specific core hours of accessibility.
- Maintain a safe, secure and well-equipped work environment (See Telework Site and Equipment Requirements section of this policy).
- Consult with an insurance agent and a tax consultant for information regarding a home-based Telework Site. *Individual tax and homeowner's insurance implications are the responsibility of the teleworker.*
- Be solely responsible for the safety and working conditions of the Telework Site. *Employee further agrees that, to the extent permitted by applicable law, employee will indemnify and hold harmless BH from any and all claims or causes of action arising from employee's use of employee's residence for work-related purposes.*

Telework Site and Equipment Requirements

The teleworker is responsible for equipping, furnishing and maintaining a suitable telework space. The allocated space must be in a safe and secure area with restricted access. Any costs associated with preparing and using a Telework Site is strictly the responsibility of the teleworker unless otherwise agreed upon. Repair and/or replacement costs and liability for privately owned equipment and furniture used during telework is the responsibility of the teleworker.

The teleworker must supply:

- Telephones and secure any services such as lines for faxes, scanners, and services associated with long-distance/charges. *Business phones may be provided in some cases.*
- Broadband or equivalent connection to the Internet and cover costs associated with connection/user fees.
- Shredder.
- A PC with an operating system that is compatible with BH Remote Access tools and updated antivirus protection (for ad hoc telework only).
- Access request to IT to establish Remote Access.

BH will supply:

- BH IT Security compliant workstation or laptop (for regular telework only).
- Network Firewall (only for regular telework utilizing VPN).
- Remote Access to all needed software.
- Teleconference software and camera where necessary.

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In the event of a power outage that is associated with the teleworker's individual situation or other circumstances that inhibits work at the Telework Site, the employee must immediately advise management of the situation and keep the Telework Administrator apprised of progress towards resolution. In such instances, the teleworker may be required to report to work at the Central Work Site.

Here are various telework scenarios and the technical and security requirements associated with each. This table is not all inclusive. Other possibilities may exist and need to be addressed individually.

Telework Scenarios with Technical and Security Requirements		
	Scenarios	**Requirements**
1	Occasionally for support or after hours; Ad hoc – limited access Part-time, limited access	• Remote Access from personal workstation or laptop. System must meet all requirements noted in Security section • Remote Access provided depending on work requirements • Multifactor Authentication for access to BH Remote Access tools.
2	Part-time, normal access; Full-time, normal access; (Direct Network Connection Required)	• BH provided workstation or laptop and accessories **only** with standard image and security agents (e.g., Carbon Black, Rapid 7, Computrace, Trend Micro, etc.). • BH Approved Firewall, if applicable • VPN Access • Multifactor Authentication for access to BH private network or other Remote Access tools.
3	Privileged access	• BH provided workstation or laptop **only,** with standard image and security agents. (e.g., Carbon Black, Rapid 7, Computrace, Trend Micro, etc.). • BH approved Firewall • Hardware VPN • Multifactor Authentication for access to BH private network or other Remote Access tools.

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Security

In compliance with BH Technology, Data Security, and IT Security policies and procedures, regular teleworkers must take all precautions necessary to secure confidential, protected, and/or privileged information and prevent unauthorized access to any BH systems. The following conditions must be met before any employee is approved for regular telecommuting:

- BH IT Security must approve, verify and validate all telecommuting requests, system setup and configuration.
- A BH-supplied and configured system is mandatory for use in telecommuting unless an exception in writing is provided by the Chief Information Security Officer [CISO]. This system may be a laptop or desktop.
- If a BH-system is not supplied or available, and the CISO approves the exception, then the following conditions for using an alternative system are applicable:
  - o Multi-Factor Authentication [MFA] must be activated before system may connect to a BH private network.
  - o System passwords must conform to BH password standards per BH policy, *Password Management*.
  - o System to be used must have strong anti-malware protection measures in place and signature files must be updated and current.
  - o System must be patched as available including operating system patches, application patches and any other patches necessary to reduce the risk of system compromise.
  - o Vulnerability and threat management clients must be installed and active.
  - o It is preferred that the hard drive of the system being used be encrypted. If, however, that is not feasible or possible, then no BH files of any type may be downloaded to the system. All BH files must be stored on an approved encrypted portable device or on a storage device on the BH native network.
  - o System to be used must be located in a secure area that can be locked and access restricted to only the employee granted rights to telecommute.
  - o System is to be used only for BH work purposes. System may not be used for personal or family activity due to the risk of information or vulnerability compromise.
  - o Device monitoring software (e.g., Carbon Black, Computrace, Rapid 7, etc.) must be installed and active on all BH-provided systems.
  - o System is subject to an audit-on-demand, either on-site or remotely as requested through BH IT Security.
  - o All BH access, account and password management restrictions are applicable to this system and user must agree to follow such restrictions.

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Non-adherence will result in immediate Remote Access termination until corrected.

Additionally, if the non-BH or alternative system is replaced after telework has begun, the teleworker must ensure that the hard drive is thoroughly cleared or destructed per BH policy, *Controls for Device and Media Containing Electronic Protected Health Information (ePHI) and BHS Proprietary Data*, so as to avoid the inadvertent transference of patient or corporate information that may have been stored in the form of temporary files and/or drafts of information.

Intellectual Property

- In accordance with BH's security of information policies, teleworkers must not:
    - Save patient information or other BH proprietary data on their home or work computer
    - Print patient information or other BH proprietary data from their home computer
- Refrain from removing from the Central Work Site any restricted-access materials or attempting to access such materials through personal computers unless approved in advance, in writing by the manager.
- Products, documents, and records used and/or developed while teleworking shall remain the property of Baptist Health and are subject to organizational policies regarding confidentiality and records retention requirements.
- Adhere to all BH confidentiality, and HIPAA compliance and security requirements.

On-Boarding Checklist

The Teleworking On-Boarding Checklist must be completed and turned in to HR and approved before employee can proceed. See **Appendix B** for reference.

Support Procedures

Any security issues should be reported to the Service Desk or IT Security. In event of a suspected breach immediately notify the IT Security on-call or Service Desk.

Technical concerns, problems, issues or questions should be addressed through a Service Desk ticket. Physical access to IT equipment is required for support and employee may need to bring system on-site. Best effort to support remote telework via virtual tools will be provided by BH IT.

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Off-Boarding Process

In addition to the Termination Procedures defined in the Termination section of BH policy, *Workforce Security*, the following steps are necessary:

- All Remote Access and AD credentials must be immediately disabled.
- MFA token(s) must be turned in or repossessed (if applicable).
- All BH provided hardware must be turned in or repossessed.
- If the teleworker is using personal system for access, then all remnants of BH activity must be purged.

PROCEDURE

To be accepted into the Telework Program (see **Appendix A**), an employee must:

- Successfully complete the 90-day Initial Assessment Period in their current position;
- Not be in a direct patient care position; and
- Not be in a progressive discipline status.

REFERENCES
Telework / Telecommuting FAQs

APPROVAL

a. Mannino

Angie Mannino
Baptist Health
Chief People and Culture Officer
Date: September 28, 2018

BH hospitals include: Baptist Health Corbin, Baptist Health Floyd, Baptist Health La Grange, Baptist Health Lexington, Baptist Health Louisville, Baptist Health Madisonville, Baptist Health Paducah, and Baptist Health Richmond.

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Appendix A

Telework Application and Safety Checklist Agreement

Section I – Employee Information
First Name: Click here to enter text.
Middle Initial: Click here to enter text.
Last Name: Click here to enter text.
Proposed Effective Dates: *From* Click here to enter text. *To* Click here to enter text. (MM/DD/YY)
Job Title / Position: Click here to enter text.   **Department:** Click here to enter text.
Job Duties / Responsibilities: Click here to enter text.
I believe my position meets the criteria for telework because: Click here to enter text.
Address for proposed telework site: Click here to enter text.
Telephone number for telework hours: Click here to enter text.

Section II – Employee Certifications, Telework Schedule and Acknowledgement

Employee Initials   **I agree and certify that:**

_____   I have read and understand the *Telework/Telecommuting Policy*

_____   I have received a copy of the *Telework/Telecommuting Policy* for my records

_____   I have read the HIPAA Security Policies

_____   I have high-speed internet access

_____   I have reviewed the performance expectations with my manager

_____   I will abide by all applicable rules and guidelines set forth in the *Telework/Telecommuting Policy*

_____   I understand the communication expectations

_____   I completed the DevelopYou training for Telework

_____   My Telework space complies with the following Health and Safety Standards:

- Heating/Cooling, ventilation and lighting are adequate for satisfactory work performance
- Space is free of asbestos containing materials
- Electrical equipment is free of recognizable hazards
- Electrical system permits the grounding of electrical equipment
- Walkways, doorways and corners are free of obstructions that interfere with visibility or movement
- File cabinets and other storage devices are arranged so that drawers/doors do not open in walkways
- Work chair is structurally sound
- Floor and/or floor covering is free of conditions that could cause trips or falls
- Electrical cords, telephone lines and equipment interface cables (if present) are secure and do not interfere with foot traffic
- Space is free of noise hazards
- Lavatories are available
- All stairs with 4 or more steps are equipped with a handrail

Appendix A

- Office space is near, clean and free of excessive amounts of combustibles

Employee Initials **I understand that:**

_____ My failure to comply with the *Telework/Telecommuting Policy* and Safety Checklist will be grounds for termination of the agreement

_____ Baptist Health has the right to inspect my Telework site, with prior notice, to ensure compliance with the *Telework/Telecommuting Policy* and Safety Checklist

_____ I will not be compensated for the use of my own PC or other personal equipment to telework

_____ All Baptist Health policies, procedures and work rules applicable at the Central Work Site are also applicable at the Telework Site

Employee's Name: Click here to enter text.

Employee's Signature: _____

Section III – Supervisor Authorization

Employee Initials

_____ **Yes, this employee is approved for Telework**

_____ The agreed upon telework schedule has been approved

_____ Performance expectations have been documented and explained to the employee

_____ Communication procedures/requirements have been established and explained to the employee

_____ The employee has received a copy of the *Telework/Telecommuting Policy*

Circle Telecommuter Type: Regular or AdHoc
Number of days per week: Click here to enter text.
Circle days for telework: M   T   W   T   F   Sat   Sun

_____ **No, this employee is not approved for Telework at this time**
If no, please provide reasoning: Click here to enter text.

Supervisor's/Manager's Name: Click here to enter text.

Supervisor's/Manager's Signature: _____

Director's Name: Click here to enter text.

Director's Signature: _____

Appendix B

Telework Onboarding Checklist

Date: Click here to enter text.
Name: Click here to enter text.
Approver: Click here to enter text.

Question	Yes	No	Comments
Has teleworking been formally approved for this employee?			
Has teleworking access been defined?			
Has employee been indoctrinated regarding applicable Security P&P?			
Has the appropriate level of enterprise and Remote Access been defined and implemented?			
Has BH equipment been deployed where applicable?			
Has employee's workstation been configured and hardened as appropriate?			
Has the employee equipped, furnished, and maintained a suitable telework space that is safe and secure with restricted access?			
Has employee completed the appropriate teleworking DevelopYou module?			
Has employee completed and submitted the signed Baptist Health Telework Agreement and the Baptist Health Telework Site Safety Checklist to their immediate supervisor/manager?			
Have the above agreements been signed and turned into the HR department?			

BH Provided Equipment Checklist

Item	Yes	No	Comments
Workstation (Desktop PC)			
Laptop			
Printer			
Monitor, Keyboard, Mouse			
IP Phone (Desk Phone)			
Cell Phone			
Portable Media			
Duo MFA Token			
Teleconferencing Software and Camera			
Scanner			
Meraki Device (Network Device)			