

 <p><b>HAWAII HEALTH SYSTEMS</b> CORPORATION <i>"Touching Lives Everyday"</i></p> <p><b>Policy</b></p>	<b>Department:</b> Information Technology Department	<b>Policy No.:</b> <b>ITD 0009</b>
	<b>Issued by:</b> Barbara Kahana Vice President & CIO	<b>Revision No.:</b> N/A
<b>Subject:</b> <b>Data Classification</b>	<b>Approved by:</b>  Thomas M. Driskill, Jr. President & CEO	<b>Effective Date:</b> 07/01/02
		<b>Supersedes Policy:</b> N/A
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- I. **PURPOSE:** The purpose of this policy is to ensure that business and medical process owners identify and communicate appropriate levels of protection required for critical information resources, and that these resources have been assigned proper classification labels. Data ownership roles are delineated in the Information Stewardship Policy (ITD 0011), and data access rules are delineated in the Information Systems Access Policy (ITD 0005). Data classification will help manage the risk to critical information resources, and will enable consistent protection of these resources throughout the enterprise, thus ensuring compliance with regulatory obligations. This will help to minimize the costs for information security.
- II. **POLICY:** This policy has been established in order to comply with Public Law 104-191, a federal law enacted on August 21, 1996, that is otherwise known as the Health Insurance Portability and Accountability Act (HIPAA).

Business and medical process owners, with guidance from the Privacy and Security Officers, shall identify critical information resources that require protection consistent with HHSC's business needs. Appropriate labeling of these information resources will be based on their data value, sensitivity, risk of loss or compromise, and legal requirements. All HHSC facilities shall use the corporate data labeling standard shown in Appendix A. Anyone who is granted access to labeled information shall be responsible for complying with procedures established to protect this information according to its classification level.

Data classification is a process to protect information, the HHSC labeling standard presented in Appendix A specifies:

- The levels of classification (Public, Protect, and Special Protect)
- The criteria to be used for each classification level

The classification labels should be used as guidelines to protect information. The sensitivity of information follows a continuum, where some information is more sensitive than other information, and should be protected in a more secure manner.

All persons who access information on HHSC information systems must be trained with regard to the meaning of, and proper handling of information assigned to the various classification levels.

### III. SCOPE

- A. Applicable Information:** This policy applies to all information resources owned or used by HHSC. For example, information contained in medical records, personnel records, confidential information from suppliers, business partners all fall within the scope of this policy.
- B. Consistent Protection:** All information shall be consistently protected throughout its life cycle, from its origination to its destruction. Information shall be protected in a manner commensurate with its sensitivity, regardless of where it resides, what form it takes, what technology is used to handle it, or what purpose(s) it serves.

### IV. REFERENCES/RELATED POLICIES

- ITD 0011 - Information Stewardship Policy
- ITD 0005 - Information Systems Access Policy

### V. POLICY DEVELOPMENT

**DEVELOPERS:** HRC Policy Committee  
Taylor Summers  
Miles Sato, CISSP

ATTACHMENT: APPENDIX A – Data Classification Matrix

**APPENDIX A**  
**Data Classification Matrix**

	<b>INFORMATION LABELS</b>		
	<b>PUBLIC</b>	<b>Protect</b>	<b>Special Protect</b>
<b>EXAMPLES</b>	Brochures, news releases, marketing materials.	All medical information (except that which must be "Special Protected"), patient medical charts, treatment, visit & appointment data, and patient financial account records.	Psychotherapy notes as defined in 45 CFR Parts 160 and 164.
<b>CRITERIA</b>	None.	Unauthorized disclosure could result in significant adverse impact or penalties to HHSC, its patients or employees.	Statutorily defined to be more sensitive than ordinary medical information.