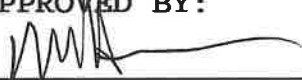


COUNTY OF IMPERIAL  
DEPARTMENT OF BEHAVIORAL HEALTH SERVICES

POLICY AND PROCEDURE MANUAL

<b>SUBJECT:</b> Data Classification	<b>POLICY:</b> 01-92
<b>SECTION:</b> Administration	<b>EFFECTIVE DATE:</b> 4-14-03
<b>REFERENCE:</b>	<b>PAGE:</b> 1 of 3
<b>AUTHORITY:</b> 45 C.F.R, Parts 160 and 164	<b>SUPERSEDES:</b> New Policy
	<b>APPROVED BY:</b> 

**PURPOSE:** To establish an information classification system for preventing the unauthorized use or disclosure of information maintained by Imperial County Behavioral Health Services.

**SCOPE:** The information in this document applies to all members of the workforce which includes employees, contract employees, volunteers, and trainees, etc., granted access to protected health information (PHI).

**NOTES:** 45 C.F.R. 164.514(d)(2)(ii) requires reasonable efforts to limit access of employees to the classes of information to carry out their duties.

Attachment I is a data classification matrix for the handling and security requirements for information based on its classification. It is provided as a guideline for gaining an understanding of the different kinds of information ICBHS handles on a day-to-day basis, their sensitivity and the risks associated with that sensitivity.

**DEFINITIONS:** Workforce: Employees, volunteers, trainees, and other persons whose conduct, in the performance of work for the covered entity, is under the direct control of such entity, whether or not they are paid by the covered entity.

**POLICY:** The ICBHS data classification system establishes different classifications of information that the department handles on a day-to-day basis, their sensitivity, and the risks associated with their sensitivity.

The ICBHS data classification system is designed to support the need to know so that information will be protected from unauthorized use or disclosure, modification, and deletion.

Information must 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, throughout its life cycle.

### Information Classification Labels

ICBHS information is classified as follows:

#### Public

Information that is available to the general public and is intended for distribution and use outside of Imperial County Behavioral Health Services (ICBHS). This information may be released to external entities without an adverse impact to ICBHS. This information includes, but is not limited to, service brochures, job opening announcements, press releases.

#### For Internal Use Only

Information that is intended for use within ICBHS. The unauthorized disclosure of such information is not expected to adversely impact ICBHS. Examples of information that is for internal use only include, but are not limited to, new employee training materials, ICBHS policy and procedure manuals, wage and salary schedules, ICBHS telephone directory, routine correspondence, inter-office memoranda.

#### Confidential

Information that is intended for use within ICBHS. The unauthorized disclosure of such information could have an adverse impact or penalty to ICBHS, employees, clients, or business associates. Examples of confidential information include, but are not limited to, the medical chart (except that which is restricted confidential), client account records, appointment schedules, client eligibility information, financial data, provider contracts.

#### Restricted Confidential

Highly sensitive information that is strictly intended for use inside ICBHS. The unauthorized disclosure of such information is likely to cause significant adverse impact and penalties to ICBHS, employees, clients, and

business associates. For example, statutorily protected medical information such as HIV and AIDS data and substance abuse treatment data, and child and physical or sexual abuse.

Employee Responsibility

All members of the workforce who may come into contact with confidential information are expected to become familiar with this data classification policy and consistently use it.

Enforcement

Management and supervisors are responsible for enforcing this policy and associated procedure(s). Members of the workforce who violate this policy or associated policies or procedures are subject to disciplinary actions appropriate to the nature of the violation in accordance with the ICBHS sanction policy.