


**GUAM MEMORIAL HOSPITAL AUTHORITY
ADMINISTRATIVE MANUAL**

APPROVED	RESPONSIBILITY	EFFECTIVE DATE	NUMBER	PAGE
	Information Technology Administrator (HIPAA Security Officer)	12/2004	6420-56	1 of 2
TITLE: INFORMATION CLASSIFICATION POLICY				

PURPOSE:

The Information Classification Policy is intended to assist employees of Guam Memorial Hospital Authority make decisions regarding what information may and may not be released to the public or disclosed to any individual outside of the organization. This is a required standard of the HIPAA Security Rule.

SCOPE:

This policy applies to all Guam Memorial Hospital Authority workforce members including, but not limited to full-time employees, part-time employees, trainees, volunteers, contractors, temporary workers, and anyone else granted access to sensitive information such as electronic protected health information (ePHI) by Guam Memorial Hospital Authority.

POLICY:

All Guam Memorial Hospital Authority information will be organized into two main classes. These classes are "Public" and "Confidential."

Public information is information that can be shared freely with anyone inside or outside of the organization without the possibility of negative consequences. Public information includes, but is not necessarily limited to:

- General information about Guam Memorial Hospital Authority such as the mission statement
- Most marketing information

Confidential information includes all other information, such as ePHI, (information that, when shared or disclosed, could possibly have a negative consequence). It is understood that there are varying levels of sensitive information, and the lengths employees should go to protect the information depends on the sensitivity.

Guam Memorial Hospital Authority will rely on the professional judgment of the individual on a daily basis when using and disclosing confidential information. If an individual is unsure of the relative sensitivity of a piece of information, they could contact their supervisor or the Security Officer.

Confidential information includes, but is not necessarily limited to:

- ePHI
- Business information

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- Financial information
- Operational information
- Most personnel information

If the sensitivity of the information is not readily apparent, the creator of the document may mark the document as “Guam Memorial Hospital Authority Confidential” in a prominent location.

RESPONSIBILITIES:

All workforce members are responsible for:

- Understanding and following all security related policies and procedures

The Guam Memorial Hospital Authority HIPAA Security Officer, under the delegated authority of the Hospital Administrator, is responsible for:

- Ensuring all workforce members understand and follow security related policies and procedures

COMPLIANCE:

Failure to comply with this or any other security policy will result in disciplinary actions as per the Sanction Policy 6420-8. Legal actions also may be taken for violations of applicable regulations and laws such as HIPAA.

REFERENCES:

- HIPAA Final Security Rule, 45 CFR Parts 160, 162, and 164, Department of Health and Human Services, <http://www.cms.hhs.gov/hipaa/hipaa2/regulations/security/default.asp>, February 20, 2003.
- CMS, “CMS Information Systems Security Policy, Standards and Guidelines Handbook”, CMS, February 2002.
- International Standards Organization (ISO/IEC 17799:2000(E)).