

Bethany Life Communities	Date Written: 2-24-2003	Date Revised: 5-1-2009
<i>Data Classification (HIPAA Security & Privacy)</i>	Page 1 of 2	

Policy Statement

A data classification system has been designed to protect resident and Bethany Life Communities information.

Policy Interpretation and Implementation

1. Bethany Life Communities' data classification system has been developed to assist in the protection of unauthorized access, use, disclosure, modification, or deletion of protected health information.
2. Bethany Life Communities' data classification policy is applicable to all Bethany Life Communities' information (e.g., resident records, financial records, business associate agreements, etc.).
3. Bethany Life Communities' team members are responsible for protecting information from its origin to its destruction. Bethany Life Communities will protect resident/facility information in a manner consistent with its sensitivity, regardless of where it resides, what form it is in, the type of technology used to create or handle it, or what purpose(s) such information serves.
4. Bethany Life Communities has assigned the following classifications to better understand generally about the information maintained/retained by Bethany Life Communities:
 - a. Public; this classification applies to information that is available to the general public and is intended for distribution outside Bethany Life Communities. Examples of this type of information include product/service brochures, advertisements, employment opportunities, press releases, event schedules, state surveys, etc.
 - b. Internal Use Only; this classification applies to information that is not otherwise included in other data classifications. Release of this information would not seriously or adversely affect Bethany Life Communities, its residents, employees, or business associates. Examples of this type of information include policy and training manuals.
 - c. Confidential; this classification applies to information that is intended to be used only within Bethany Life Communities. Release of this information could seriously affect our residents, employees and business associates. Examples of this type of information include resident medical and financial records, Bethany Life Communities financial reports, purchasing records, business associate contracts, etc.
 - d. Restricted Confidential; this classification applies to the most sensitive medical and business information that is intended strictly for use within Bethany Life Communities. The release of such information could seriously and adversely affect the residents, employees and business associates. Examples of this type of information include medical treatment information (e.g., HIV testing, mental health treatments, merger

Bethany Life Communities	Date Written: 2-24-2003	Date Revised: 5-1-2009
<i>Data Classification (HIPAA Security & Privacy)</i>	Page 2 of 2	

or acquisition documents, legal documents, internal corporate documents, etc.).

5. This classification system is informal and does not involve actual “labeling” of files or data.
6. Bethany Life Communities team members are responsible for reporting known or suspected unauthorized access, use, or disclosure of resident or Bethany Life Communities information to the HIPAA Compliance Officer or to the CEO/President.