**POLICY & PROCEDURES**

***Defining the Overall Approach toward Meeting a Requirement***

### **Applications and Data Criticality Analysis §164.308(a)(7)(ii)(E)**

### **Effective Date:** <Month Day, Year>

### **Policy Number:** <If applicable> **Rev.** 0

**Policy:** We must have a formal, documented process for defining and identifying the criticality of our information systems and the data contained within them. The prioritization of our information systems must be based on an analysis of the impact to our services, processes and business objectives if disasters or emergencies cause specific information systems to be unavailable for particular periods of time. This criticality analysis must be conducted at least annually.

**Procedures:** Our Security Official along with authorized personnel (i.e. Contingency Team) are responsible for data recovery and restoring information systems during a disaster or emergency. They use the data criticality analysis to prioritize the recovery of information systems.

**Details:** The applications and data criticality analysis procedures include but are not limited to:

* Define and identify the criticality of information systems containing ePHI data to help determine which applications or information systems get restored first in the event of a disaster or emergency and/or which must be available at all times.
* Develop and maintain an ePHI inventory list (i.e. the inventory of all applications, computer systems, medical devices, phones, and media that contain, process, or transmit ePHI) and a corresponding data criticality analysis on an annual basis.
* The Security Official along with authorized personnel (i.e. Contingency Team) who are responsible data recovery and restoring information systems during a disaster or emergency will use the data criticality analysis to prioritize the recovery of information systems.
* Documentation (i.e. PHI inventory list) of the practices in place will be retained as evidence of compliance.

**Location of supporting documentation:** If so, identify the document and location it is stored here.

## REVISION HISTORY

| Revision | Date | Initiator | Nature of Change |
| --- | --- | --- | --- |
| 0 |  |  | Initial draft |
| 1 |  |  |  |