

HIPAA Training Policy

Introduction

STRATEQ HEALTH, INC. has adopted this HIPAA Training Policy in order to recognize the requirement to comply with the Health Insurance Portability and Accountability Act ("HIPAA"), as amended by the Health Information Technology for Economic and Clinical Health ("HITECH") Act of 2009 (Title XIII of division A and Title IV of division B of the American Recovery and Reinvestment Act "ARRA") and the HIPAA Omnibus Final Rule (Effective Date: March 26, 2013).

STRATEQ HEALTH, INC. hereby acknowledges our duty and responsibility to protect the privacy and security of Individually Identifiable Health Information ("IIHI") generally, and Protected Health Information ("PHI") as defined in the HIPAA Regulations, under the regulations implementing HIPAA, other federal and state laws protecting the confidentiality of personal information, and under principles of general and professional ethics. We also acknowledge our duty and responsibility to support and facilitate the timely and unimpeded flow of health information for lawful and appropriate purposes.

Scope of Policy

This policy governs HIPAA Privacy and Security Training for **STRATEQ HEALTH, INC.** All personnel of **STRATEQ HEALTH, INC.** must comply with this policy. Demonstrated competence in the requirements of this policy is an important part of the responsibilities of every member of the workforce.

Officers, agents, employees, Business Associates, contractors, affected vendors, temporary workers, and volunteers must read, understand, and comply with this policy in full and at all times.

Assumptions

- STRATEQ HEALTH, INC.** hereby recognizes its status as a Business Associate under the definitions contained in the HIPAA Regulations.
- STRATEQ HEALTH, INC.** must comply with HIPAA and the HIPAA implementing regulations, in accordance with the requirements at 45 CFR Parts 160 and 164, as amended.
- Clear and complete HIPAA training, in combination with appropriate HIPAA awareness resources, can significantly reduce the likelihood of breaches of confidential health information and the likelihood of HIPAA violations.

Policy Statement

- ❑ It is the Policy of **STRATEQ HEALTH, INC.** to provide clear and complete HIPAA training to all members of the workforce, including officers, agents, employees, contractors, temporary workers, and volunteers.
- ❑ HIPAA training provided by **STRATEQ HEALTH, INC.** shall include relevant and appropriate aspects of both health data privacy and health data security, as it pertains to **STRATEQ HEALTH, INC.**'s operations and to the duties and responsibilities of specific individuals, workgroups, departments, and divisions.

Procedures

- ❑ HIPAA training, at minimum, shall include the basics of HIPAA itself; the basics of HIPAA's privacy and security requirements and restrictions; and a review of relevant and appropriate internal Policies and Procedures related to HIPAA and HIPAA compliance.
- ❑ HIPAA training shall be provided to all new hires during the new employee orientation period, before new employees are exposed to or work with individually identifiable health information.
- ❑ HIPAA training shall be conducted periodically for all employees, but no less than every six months.
- ❑ Fostering ongoing, continuous HIPAA awareness shall be regarded as a separate type of workforce learning from regular HIPAA training. The designated HIPAA Privacy Official shall be responsible for the development (or acquisition), and deployment of appropriate HIPAA awareness materials to maintain a high level of HIPAA awareness among the workforce.
- ❑ The designated HIPAA Privacy Official, or other responsible party (if no Privacy Official has been designated), is responsible for the development or acquisition of appropriate HIPAA training and awareness resources.
- ❑ HIPAA training resources should aim to develop a general understanding of HIPAA and its requirements and restrictions. HIPAA awareness resources should aim to maintain a high level of HIPAA awareness, and a protective attitude toward confidential data on an ongoing, daily basis.

Compliance and Enforcement

All managers and supervisors are responsible for enforcing this policy. Employees who violate this policy are subject to discipline up to and including termination in accordance with **STRATEQ HEALTH, INC.**'s Sanction Policy.