

Risk Management Implementation Policy

Introduction

STRATEQ HEALTH, INC. has adopted this Risk Management Implementation 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 Risk Management Implementation 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 pertaining to risk management implementation, in accordance with the requirements at § 164.308(a)(1).
- Compliance with HIPAA is mandatory and failure to comply can bring severe sanctions and penalties.
- This Risk Management Implementation Policy shall be considered an integral part of our other Risk Management policies, including, but not limited to, our:
 - Risk Management Process Policy, and our
 - Risk Analysis Policy

Policy Statement

- It is the Policy of **STRATEQ HEALTH, INC.** to fully and completely implement our risk management process and all related policies.
- The implementation of our risk management process, analyses, and improvements shall be under the direct supervision of the designated HIPAA Official or HIPAA Officer.
- The Privacy Official, or other responsible party (if no Privacy Official has been designated), shall develop and implement a plan, procedures, and a timetable for the implementation of our risk management process in all its aspects. Such actions shall be consistent with our other risk management policies.

Procedures

- Develop and implement a risk management plan.
- Implement security measures.
- Evaluate and maintain security measures.

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.