Policy Number: SHI-PP-021
Effective Date: Jan 01, 2020
Last Revised: _____

Authorization and Supervision Policy

Introduction

STRATEQ HEALTH, INC. has adopted this Authorization and Supervision 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 the authorization and supervision of health data-related access and activities 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 the authorization and supervision of workforce members who will be accessing individually identifiable health information as part of their work-related duties, in accordance with the requirements at § 164.308(a)(3).
- ❑ Compliance with HIPAA is mandatory and failure to comply can bring severe sanctions and penalties.
- ❑ Proper and appropriate authorization to access individually identifiable health information, and appropriate supervision of workforce members authorized to access

individually identifiable health information, are essential components of a well-managed risk management system.

- ❑ Proper and appropriate authorization to access individually identifiable health information, and appropriate supervision of workforce members authorized to access individually identifiable health information, can help reduce our overall risk, and reduce the likelihood of data breaches and HIPAA violations.

Policy Statement

- ❑ It is the Policy of **STRATEQ HEALTH, INC.** to only permit workforce members who have been appropriately authorized, to have access to individually identifiable health information.
- ❑ It is the Policy of **STRATEQ HEALTH, INC.** to properly and appropriately supervise workforce members who have access to individually identifiable health information.
- ❑ Workforce members of **STRATEQ HEALTH, INC.** shall have access only to the individually identifiable health information that they need in order to perform their work-related duties.
- ❑ It is the Policy of **STRATEQ HEALTH, INC.** to fully document the authorization and supervision of all workforce members who have access to individually identifiable health information.

Procedures

- ❑ Grant individualized OpenVPN access ID to authorized personnel only.
- ❑ Grant individualized AWS IAM access key to authorized personnel only.
- ❑ Grant individualized TMS access ID to authorized personnel only.

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.