

# Access Authorization Policy

## Introduction

**STRATEQ HEALTH, INC.** has adopted this Access Authorization 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 granting of access to individually identifiable health information and Protected Health Information to workforce members of **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 access authorization, in accordance with the requirements at § 164.308(a)(4).
- The implementation of appropriate processes to grant workforce members access to individually identifiable health information and Protected Health Information can help ensure that our uses and disclosures of individually identifiable health information are lawful and appropriate.

## Policy Statement

- It is the Policy of **STRATEQ HEALTH, INC.** to grant workforce members an appropriate level of access to individually identifiable health information that is based on their work-related duties and responsibilities.
- The level of access to individually identifiable health information and Protected Health Information granted to each member of the workforce shall be independent of the technology used to access such information, and shall apply to access through a workstation, transaction, program, process, or other mechanism.
- It is the Policy of **STRATEQ HEALTH, INC.** to fully document all access authorization-related activities and efforts.

## 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.
- Grant individualized Office365 user access 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.