### Purpose:
To designate Health Quest Systems, Inc. and its Affiliates (“HQ”) as an Affiliated Covered Entity (“ACE”).

### Policy:
- HIPAA regulations 45 CFR § 164.105 (b) state that legally separate covered entities may designate themselves as a single affiliated covered entity if all of those entities are under common ownership or control. Therefore, by means of this policy, HQ designate themselves and henceforth shall act as one ACE.

- A written and/or electronic copy of the designation will be maintained within the HQ Corporate Compliance Office for 6 years from the date of its creation or the date when it last was in effect, whichever is later, updated as required, and made available upon request.

### Definitions:
See HIPAA Glossary

### Enforcement:
All individuals whose responsibilities are affected by this policy are expected to be familiar with the basic procedures and responsibilities created by this policy. Failure to comply with this policy will be subject to appropriate remedial and/or disciplinary action, up to and including termination of any employment or other relationship, in accordance with this policy.

### References:
45 CFR 164.105 (b) and (c)
5.2.29 Affiliated Covered Entity Designation Procedure

### Policy History:
Supersedes: 9/27/17
Original Implementation Date: 12/21/16
Date Reviewed: 3/13/19, 3/26/20
Date Revised: 12/21/16, 9/27/17, 3/13/19, 3/26/20

### Approval:
W.A. McNulty by [Signature] 3.31.20
Policy Owner Date