PURPOSE:
The purpose of this policy is to establish appropriate administrative, technical, and physical safeguards of Sensitive Protected Health Information including Protected Health Information (“PHI”) and Electronic Protected Health Information (“ePHI”) created, used, or disclosed by the members of the Health Quest Systems, Inc. and its affiliates (“HQ”) Work Force.

POLICY:
1. It is the policy of HQ to comply with the applicable provisions of the HIPAA Privacy Rule section 45 C.F.R 164.530 (c) (1). It is also the policy of HQ to apply appropriate administrative, technical, and physical safeguards to protect PHI from misuse, loss, tampering, or use by unauthorized persons.

2. This policy addresses safeguarding of PHI received, created, used, maintained, and/or transmitted regardless of form, format or medium in accordance with the minimum necessary requirements for any disclosures set forth by federal, state and local laws and pertinent internal policies related to release of information, identity verification and system access policies.

3. All members of the HQ Work Force are responsible for adhering to this policy by using only the minimum information necessary to perform his or her responsibilities, regardless of the extent of access provided or available, and identifying and limiting practices which are likely to result in incidental uses or disclosure of Sensitive Information, PHI or ePHI.

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 and related procedure may result in remedial and/or disciplinary action, up to and including termination of any employment or other relationship.

REFERENCES:
Title: Safeguards for Sensitive Information, Protected Health Information and Electronic Protected Health Information Policy

Reference Number: HQ 5.2.15

Signature: Chief Compliance Officer

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45 CFR, Parts 160 and 164.5305.2.08 Minimum Necessary for Use and Disclosure
HQ 5.2.15 Safeguards for Sensitive Information, Protected Health Information and Electronic Protected Health Information Procedure

POLICY HISTORY:
Supersedes: 2/13/2019
Original Implementation Date: 4/15/2003
Date Reviewed: 2/28/2020

APPROVAL:

Policy Owner

Date 2/28/20