HIPAA PRIVACY POLICY - SELF FUNDED GROUP HEALTH PLAN

The Board of Education provides coverage to eligible employees under self-funded group health plans. The Board has established the following self-funded group health plans:

- Dental Plan

- Vision Plan

- Health Flexible Spending Accounts (FSA)

The Board acknowledges that these group health plans are required to comply with the Health Insurance Portability and Accountability Act (HIPAA) Privacy Rule. Certain health information maintained by these group health plans is afforded significant protection by this Federal law.

The Board hereby appoints the Fringe Benefits Coordinator, under the supervision of the Assistant Superintendent for Personnel and Labor Relations, to serve as the Privacy Protection Officer of the group health plans. The Board delegates authority to the Personnel Department to develop and implement the internal policies and procedures for the group health plan(s) relating to the use and disclosure of Protected Health Information. Protected Health Information (PHI) is any written, oral or electronic form of information, relating to a person's past, present or future health condition, delivery or payment of health services that identify an individual or where there is a reasonable basis to believe the information could be used to identify an individual. In the event that the HIPAA Privacy Rule is subsequently amended, the Privacy Protection Officer is authorized to make necessary amendments to the internal policies and procedures.

The Privacy Protection Officer shall develop administrative guidelines necessary to implement this policy.

Since the Department of Health and Human Services (HHS) has the authority to impose civil monetary penalties (CMP) for violations of the HIPAA Privacy Rule, the Board agrees to indemnify and hold harmless the Privacy Protection Officer for any CMP imposed upon him/her in connection with the performance of his/her duties for the group health plans.

The Board reserves the right to revoke any or all delegations set forth in this policy at any time for any reason.

Adopted: _____