

CITY OF GREEN BAY HIPAA PRIVACY POLICY

The City of Green Bay ("City") is committed to compliance with the HIPAA Privacy Rules ("Rules") set forth by the U.S. Department of Health and Human Services ("HHS"). These Rules dictate that all personally identifiable health information ("health information") that is received by or generated through a "covered entity" must be afforded certain protections. "Covered entities" include health plans, health care providers and health care clearinghouses. The City maintains several health plans that are covered entities, and the City also has certain functions that qualify as "health care providers." Accordingly, as an entity that has some "covered functions" and some "non-covered functions," the City will consider itself a "hybrid entity," for purposes of and as allowed by the Rules. This means that only the "health care components" (as set forth below) and covered health plans will be subject to the Rules.

Health information must be kept within ("firewalled" within) the City's health plans and health care components. Any sharing or disclosure by the City health plan(s) or health care components of health information for reasons other than claim payment, treatment or health care operations would require direct authorization from the participant/patient. Accordingly, the City has developed specific procedures to ensure that each City health plan participant's or patient's health information is used and disclosed in conformance with the Rules.

Each City employee or recipient of City-covered health services should also be aware that not all personally identifiable health information is subject to the Rules. Only the City's health plans and "health care components" are subject to these requirements. The City's "health care components" are as follows: CITY OF GREEN BAY FIRE DEPARTMENT

All of the City representatives that work with and have access to participants' and patients' health information are trained to ensure confidentiality of such information. Furthermore, only those City representatives that need to have access to such information for purposes of payment, treatment or health care operations will be allowed to view the information without express authorization from the patient (or his/her parent if the patient is under 18), unless disclosure of such information is otherwise allowed under the Rules.

Finally, the City has/will be entering into a contract with each of its business associates (as defined under the Rules) which has access to plan participants' or patients' health information. Each contract provides that the business associate shall generally have access to the health information only for purposes of payment, treatment and health care operations. Furthermore, the business associate must keep the health information confidential under the same conditions that the health plan or health care component follows. That is, each business associate is contractually obligated to follow Rules to which the City's health plans and health care components are subject.

Please refer to the City's Notice of Privacy Practices form for a complete description of your rights and the City's obligations under the HHS privacy requirements. The City has designated the Human Resources Director as its Privacy Officer. City health plan participants and patients can contact the Human Resources Director at 100 N. Jefferson Street, Room 500, Green Bay, WI 54301; (920) 448-3356 with their questions about this Policy.