

POLK-BURNETT ELECTRIC COOPERATIVE

Policy No.: **BD-22**

Subject: **Health Insurance Portability & Accountability Act (HIPAA) Compliance**

Objective: To ensure compliance with the HIPAA Privacy Rules regarding protected health information of employees belonging to Polk-Burnett's employer-sponsored group health plans.

Policy:

1. On behalf of the board of directors, the general manager shall appoint:
 - a. A HIPAA Coordinator who will serve as the primary focal point for all HIPAA compliance-related activities. The HIPAA Coordinator organizes, tracks and monitors the Polk-Burnett Electric Cooperative Employee Health Benefit Plan's ("Plan") efforts toward compliance and ensures that the Plan meets all requirements under HIPAA.
 - b. A Privacy Officer to oversee all ongoing development, implementation, maintenance of, and adherence to the organization's policies and procedures covering the privacy of, and access to, protected health information in compliance with federal and state laws and the Plan's information privacy practices. The HIPAA Coordinator and Privacy Officer can be the same person.
 - c. A HIPAA Security Officer to oversee all ongoing development, implementation, maintenance of, and adherence to the policies and procedures that provide security of and access to the Plan's information systems, and employee, business and member information.
2. The appointees shall be assigned the responsibility for enforcing HIPAA compliance privacy regulations and will serve at the discretion of management.

Edward O. Gullickson, President
July 28, 2014