
CITY OF KETTERING — ADMINISTRATIVE POLICIES

PERSONNEL POLICIES & PROCEDURES

8/06

Policy No. 205: HIPAA Privacy

A. General Provisions

1. The City of Kettering (the “City”) sponsors one or more group plans that provide medical and dental benefits (the “Plan”). The Health Insurance Portability and Accountability Act of 1996 (“HIPAA”) and the applicable regulations restrict the City’s and the Plan’s ability to use and disclose protected health insurance information (“PHI”). PHI is defined as:

Information that is created or received by the Plan and relates to the past, present or future physical or medical health or condition of a participant; or the past, present or future payment for the provisions of health care to a participant; and that identifies the participant or for which there is a reasonable basis to believe the information can be used to identify the participant. PHI includes information of persons living or deceased.

2. It is the City’s and the Plan’s policy to comply fully with all HIPAA requirements. To that end, all members of the City’s workforce who have access to PHI must comply with HIPAA rules and regulations governing the use and disclosure of PHI. Members of the City’s workforce are defined for this policy only as employees, volunteers, trainees and other individuals who work under the direct control of the City.
3. It is the City’s policy that no member of the City’s workforce will intimidate, threaten, coerce, discriminate against or take any retaliatory action against any individual for exercising his or her rights, filing a complaint, participating in an investigation or opposing any improper practice under HIPAA. In addition, no one will, under any circumstances, be asked to waive his or her rights under HIPAA.

The City Manager hereby delegates the appropriate responsibility and authority to administer this Policy to the City’s Assistant City Managers and Department Directors.

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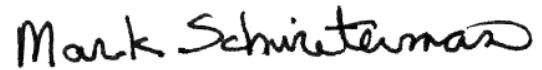
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Approved:

9/18/06

Date

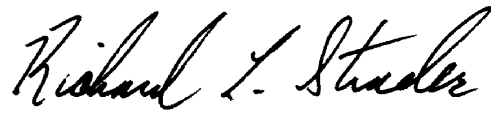


Mark Schwieterman
City Manager

Issued:

10/27/06

Date



Richard L. Strader
Director of Human Resources