

Notice of Privacy Practices Compliance Date: April 14, 2004

This notice describes how the College protects the confidentiality of College faculty and staff's personal information collected for the purposes of administering our benefits plan.

Washtenaw Community College respects the privacy of the personal information supplied by its faculty and staff and understands the importance of keeping this information confidential and secure. This notice is intended to describe the information we collect, how we use that information, how we safeguard that information, and when and to whom we may disclose it.

This notice is produced in conformance with the Health Insurance Portability and Accountability Act of 1996 (HIPAA).

What type of personal information does the College receive?

The College may receive two types of personal information as defined by the HIPAA regulations: Protected Health Information and/or Individually Identifiable Health Information.

Protected health information (PHI) is current, past or future information created or received by the College through its health plans, health care carriers, and contractors. It relates to the physical or mental condition of a patient or benefits plan member, the provisions of health care to that person, or payment for the provision of health care to that person. The term PHI does not generally include publicly available information, or information available or reported in a summarized or grouped manner.

Individually identifiable health information (IIHI) includes the PHI described above as well as any information that identifies the individual, or with respect to which there is a reasonable basis to believe the information can be used to identify the individual (i.e., demographic information).

How does the College use this information?

The College uses this information only for purposes of:

- acting as Plan Sponsor for the benefits plan;
- enrolling the faculty and staff in the benefits plan;
- advocating on the employee's behalf (and at the employee's request) for health care treatment;
- advocating on the employee's behalf (and at the employee's request) for appropriate payment of health claims;
- developing and maintaining the benefits plan (i.e., evaluating health plan performance, underwriting, premium rating, etc.);
- facilitating workers compensation claims and payment;
- as required by law (i.e., in matters of public health).

The College does NOT use this information for:

- for any employment-related decisions, such as hiring, promotions or terminations;
- for any employment-related decisions, such as leaves of absence, drug testing and compliance with the Americans with Disabilities Act, unless proper authorization is first obtained.

Who has access to this information?

The access to and use of this information is strictly limited to only those employees who need it to provide benefits services to faculty and staff, and to those employees and the third party administrator who develop, administer, and monitor the benefits plan itself. Such staff includes the Benefits staff in HRM (Director, Analyst and Specialist), the AVP of HRM, the Controller and designated financial staff, Weyco, Inc. (our third party administrator), and the College's auditors. These designated individuals at all times shall comply with the provisions of the Plan Document and Summary Plan Description relating to use and disclosure of PHI and with the Privacy Standards.

The access to and use of PHI and/or IIHI by the individuals described above shall be restricted to the Plan Administration activities that the Plan Sponsor performs for the Plan. Any violation of the provisions of the Plan or the Privacy Standards will be fully investigated and documented. Anyone found acting in violation may be subject to discipline up to and including termination.

How else is this information safeguarded?

The College maintains all confidential paper personal information in individual files, located in a separate and locked down environment. Only benefits staff is allowed access to these files.

All confidential electronic personal information maintained on any electronic system is safeguarded by firewalls and controlled security access.

Furthermore, the College makes reasonable efforts to limit access to PHI and IIHI to only the category or categories of PHI and IIHI to which access is needed, upon any conditions appropriate to such access.

What are my rights to access and correct, as needed, my personal information?

WCC has procedures for an employee to access specific personal information and will make this information available to the participant upon proper, reasonable and specific written request and consent. You may request:

- to inspect your personal information or receive a copy of your personal information;
- to amend any personal information that is not correct;
- that we communicate with you about personal, confidential matters in a certain way or at a certain location;
- to request a restriction or limitation on the information we disclose (refer to How does the College uses this information? above);
- to request an accounting of disclosures.

All requests for any of the above should be sent, in writing to:

Director, Compensation and Benefits
Human Resource Management
Washtenaw Community College
P.O. Box D-1
Ann Arbor, MI 48106-1610