6.3. POLICY 955 – HEALTH INSURANCE PORTABILITY AND ACCOUNTABILITY ACT COMPLIANCE POLICY – REVISED – FIRST READING

Policy 955 – Health Insurance Portability and Accountability Act Compliance policy is presented for a First Reading. Revised language of this policy provides greater consistency and clarity and aligns with the federal statute of Health Insurance Portability and Accountability Act (HIPAA).

The policy has been reviewed by the College's legal counsel and vetted through CLC's shared governance system, which includes representation from all impacted staff.

Recommended changes are highlighted in red and reflect changes presented as the First Reading. No action will be taken at this time.

955 HEALTH INSURANCE PORTABILITY AND ACCOUNTABILITY ACT ~~COMPLIANCE POLICY~~

~~Group health plans sponsored by t~~The College of Lake County (the "College") ~~including medical, dental, vision, prescription drug plans, employee assistance plans and flexible spending account plans, may be subject to the Privacy Rule of the Health Insurance Portability and Accountability Act (HIPAA) or general HIPAA requirements. When applicable, these plans~~ shall comply with the Health Insurance Portability and Accountability Act (HIPAA) (Public Law 104-191). ~~and its Privacy Rule and shall be amended to reflect compliance.~~

The College shall comply with all applicable provisions of HIPAA, including requirements governing the privacy, security, and confidentiality of protected health information. This policy applies to College-sponsored health benefit plans and other College operations subject to HIPAA. Protected health information shall not be used or disclosed for employment-related decisions except as permitted by law. The College will maintain appropriate administrative procedures to ensure compliance with HIPAA and related regulations.~~Further, activities undertaken by the College of Lake County's Health Center also may subject the College and its employees to the HIPAA Privacy Rule.~~

The Chief Human Resources Officer is the HIPAA Privacy Officer and responsible for the College's HIPAA compliance programs. If the Chief Human Resources Officer position is vacant, the President will temporarily designate a HIPAA Officer. ~~To the extent the College is aware of any health information of any plan participant or student, the College has always valued the confidentiality of such health information. It remains the policy of the College that a plan participant's health information will not be used or disclosed for employment-related actions or decisions affecting the benefits of an individual employee. Also, it remains the policy of the College to respect the confidentiality of student health information acquired through activities of the Health Center. Further, it is the policy of the College of Lake County to comply with all applicable provisions of HIPAA and its Privacy Rule. This Policy shall be implemented according to established administrative procedures, which may be obtained from the Human Resources Office.~~

Adopted 01/27/2004
Amended XX/XX/2026