

Under the Privacy Regulations included within the federal HIPAA (Health Insurance Portability and Accountability Act), any employer that sponsors a health plan and possesses privately identifiable health information about its employees must implement policies and procedures to protect information and keep it confidential. A self-insured plan creates more obligations for employers, even if you receive only summary health information. Only health and dental plans affected; not disability plans, workers compensation, accidental death and dismemberment insurance, or other insurance arrangements. In this case, you still must comply with all of the administrative requirements and include health care flexible spending accounts. The restrictions are designed to ensure that health data is not used in making employment related decisions, among other things. These regulations do not apply to the employer itself but to the health plan itself. The regulations include developing and documenting policies restricting employee access to others' health information, distributing to employees a notice of privacy practices, amending the Plan Document/SPD, providing privacy training to all employees and other personnel having access to protected health information, appointing a privacy officer and developing and internal complaint procedure.

The deadline for compliance is Wednesday, April 14, 2004.