NOTE: This policy is provided for reference only. The Plan has combined the position of Contact Person with the position of Privacy Officer and all relevant alterations have been made to the Policy 1–Privacy Officer and Policy 1–Form A–Designation of Privacy Officer, effective April 14, 2003.

CONTACT PERSON

Pursuant to the HIPAA Privacy Rules, Western Michigan University Group Health Plan ("Plan") creates the position of Contact Person. The position’s reporting obligations, essential functions and qualifications are as set forth the following job description.

The designation of the Contact Person shall be documented (Form A attached). The Plan shall retain documentation for six years from the date on which the person served in the capacity of Contact Person.

Contact Person Job Description

Position Summary: The position of Contact Person is required under the Health Insurance Portability and Accountability Act of 1996 (HIPAA). The Contact Person is receiving complaints under the Privacy Rules and providing information to individuals regarding the Plan’s privacy practices.

Reports to: The Contact Person reports to the Privacy Officer.

• Essential Functions:
  • maintaining familiarity with the Plan's privacy practices;
  • maintaining and distributing, as necessary, information about the Plan's privacy practices;
  • responding to suggestions and complaints regarding the Plan's privacy practices;
  • providing clarifications regarding the Plan's privacy practices;
  • responding to requests for access to Protected Health Information;
  • responding to requests to amend Protected Health Information;
  • responding to requests for accountings of disclosures;
  • suggesting amendments to the Plan's privacy policies, which shall be forwarded to the Privacy Officer;
  • forwarding any legal complaints served upon the Contact to the Privacy Officer; and
  • documenting, in writing, the actions taken.

Qualifications: Requires the following minimum qualifications:

• familiarity with the privacy policies and procedures;
• familiarity with Western Michigan University's business functions and operational structure;
• ability to communicate both orally and in writing;

Regulatory Authority
45 C.F.R. § 164.530(a)
• strong interpersonal skills;
• ability to effectively report on the status and implementation of projects to senior management.
NOTE: This policy is provided for reference only.
The Plan has combined the position of Contact Person with the position of Privacy Officer and all relevant alterations have been made to the Policy 1–Privacy Officer and Policy 1–Form A–Designation of Privacy Officer, effective April 14, 2003.

DESIGNATION OF CONTACT PERSON

DESIGNATION:
The following individual shall be designated as the [Plan]'s Contact Person:

Name/Title: ____________________________________________
Address/phone: __________________________
Fax/e-mail: __________________________

DUTIES:
• maintaining familiarity with the Plan's privacy practices;
• maintaining and distributing, as necessary, information about the Plan's privacy practices;
• responding to suggestions and complaints regarding the Plan's privacy practices;
• providing clarifications regarding the Plan's privacy practices;
• responding to requests for access to Protected Health Information;
• responding to requests to amend Protected Health Information;
• responding to requests for accountings of disclosures;
• suggesting amendments to the Plan's privacy policies, which shall be forwarded to the Privacy Officer;
• forwarding any legal complaints served upon the Contact to the Privacy Officer; and
• documenting, in writing, the actions taken.

TERM:
The Contact Person shall serve until removed by the Privacy Officer or until he or she resigns the position.

Effective as of ____________ 200_.

Privacy Officer

Regulatory Authority
45 C.F.R. § 164.530(a)