Policy Regarding Notice of Privacy Practices

POLICY: Pursuant to the HIPAA Privacy Rules, it is the policy of the Western Michigan University Group Health Plan (“Plan”) to prepare and disseminate a Summary Notice and a Notice of Privacy Practices (“Notice”) as follows.

PROCESS:

1. The Summary Notice and the Notice of Privacy Practices are attached to this Policy. The Privacy Officer has sole authority to change these Notices.

2. The Privacy Officer is responsible for distribution and document retention.

3. The attached Notices will be distributed to all named insureds on or before April 14, 2003. Thereafter, the then-current Notices will be distributed when a named insured first enrolls in the Plan and to all named insureds within 60 days of a material change in the Notices.

4. The Notices must be communicated electronically on Western Michigan University's Web site.

5. Notice may be provided electronically via e-mail if a plan participant has agreed to this form of electronic distribution and that agreement has not been withdrawn. We will infer agreement if our enrollment or employment forms request an e-mail address and a participant provides one. Advance agreement will not be required if the participant has regular access to Western Michigan University's electronic information system at his/her worksite and can print an e-mail document.

6. If an e-mail attempt at delivery fails, a written copy of the Notices will be provided.

7. Individuals have a right to a copy of the Notice of Privacy Practices upon request.

8. On April 14, 2006, and every three years thereafter the Plan will remind existing plan participants about the availability of the Notice of Privacy Practices and how to obtain a copy of the Notice.

9. A copy of each Notice will be retained for six years from either the date first created or the date last in effect, whichever date is later.