

## ***HIPAA PRIVACY POLICIES & PROCEDURES***

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These HIPAA Privacy Policies and Procedures implement our obligations to protect the privacy of individually identifiable health information that we create, receive or maintain as a group health plan. **SCOE** (the “Sponsor”) is the sponsor of the **Benefits Plan** (the “Plan”), to whom these Policies and Procedures apply.

Sponsor adopts these policies, along with the attached forms, on behalf of the Plan. The Plan implements these Health Information Privacy Policies and Procedures as a matter of sound business practice, to protect the interests of our enrollees, and to fulfill our legal obligations under the Health Insurance Portability and Accountability Act of 1996 (“HIPAA”) and its implementing regulations at 45 Code of Federal Regulations Parts 160 and 164 (“Privacy Rules”). If we are uncertain of the meaning of a term we will look it up or consult legal counsel.

You are obligated to follow these Health Information Privacy Policies and Procedures faithfully. Failure to do so can result in disciplinary action, including termination of your employment.

If you have questions about any use or disclosure of individually identifiable health information or about your other obligations under these Health Information Privacy Policies and Procedures, the Privacy Rules or other federal or state law, consult Terri Walker in Human Resources at **(707) 524-2824** before you act.

Effective Date: 10/1/2015

Last Revised: July 12, 2016