



Common Council Agenda Item

Meeting Date: October 21, 2025

Agenda Item: HIPAA Privacy Policy

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BACKGROUND

(Enter the who, what when, where, why)

When the City transitioned to a self-funded health insurance plan, we became subject to additional federal requirements under the Health Insurance Portability and Accountability Act (HIPAA). Specifically, as a self-funded employer, the City is responsible for providing HIPAA privacy notices to employees and maintaining compliance with privacy and security regulations applicable to group health plans.

Additionally, we have been advised that it is in the City's best interest to designate a Privacy Officer to oversee compliance, coordinate staff training, and serve as a point of contact for any privacy-related issues.

In reviewing the HIPAA requirements, the City's key obligations can be summarized as follows:

1. Develop HIPAA-compliant privacy policies
2. Appoint a Privacy Officer
3. Develop security policies
4. Provide training and distribute required privacy notices

While this is a simplified summary, it captures the core responsibilities that must be addressed to bring the City into compliance, as well as provide us opportunities for usage research. A draft Privacy Policy has been prepared to meet these requirements.

PREVIOUS ACTIONS – COMMITTEE RECOMMENDATIONS

(Dates, committees, action taken)

None

FINANCIAL IMPACT

(If none, state N/A)

N/A

STAFF RECOMMENDATION

Staff recommends that the Council approve the adoption of a HIPAA Privacy Policy to ensure compliance with federal regulations. Approval of this policy will allow the City to implement required privacy and security measures, distribute notices to employees, and provide staff training as required under HIPAA.

ATTACHMENT(S) INCLUDED

(If none, state N/A)

1. Draft HIPAA Privacy Policy