

**HIPAA Privacy Policies & Procedures Adoption Agreement**

Instructions: This is the Policy and Procedure which is required by the HIPAA Privacy Rules. As the employer, we need to complete it on behalf of our health plan. Note that these Policies and Procedures are, technically, the "plan's" policies and procedures. So, when the Policies and Procedures refer to "us" or "we", the Policies and Procedures are referring to the health plan. This can be confusing, but HIPAA treats the "health plan" as a separate entity, different from the "employer".

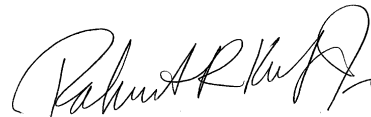
**The City of Lake Forest Traditional, Choice & Basic Medical Plans, Rx Plan Dental Plan, Health Reimbursement Account, and Flexible Spending Account**

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. The City of Lake Forest (the "Sponsor") is the sponsor of the The City of Lake Forest Traditional, Choice & Basic Medical Plans, Dental Plan, Health Reimbursement Account, and Flexible Spending Account (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 our Privacy Official—DeSha Kalmar, Director of Human Resources— at 847-810-3530 or [kalmard@cityoflakeforest.com](mailto:kalmard@cityoflakeforest.com) before you act.



Robert R. Kiely, Jr.  
City Manager