

## **Benco Personnel Manual**

### **SELF-FUNDED VISION PLAN (HIPAA COMPLIANCE)**

Benco has established HIPAA privacy practices to protect employee vision records and other personal health information. The HIPAA privacy practices set forth limits and conditions on the uses and disclosures of protected health information that can be made without an employee's authorization.

Benco has established three privacy officials, the Executive Director, the Personnel Director and the Finance Director who will be the only personnel at Benco to handle an employee's vision reimbursement. These three officials have been trained on the policy and procedure with respect to protected health information which can be found in each of the employee personnel files. All documentation submitted by an employee will only be handled by these individuals and will remain confidential and sealed and/or latched up during and after the processing time.

Employees will turn their vision reimbursement form and receipt into a clearly labeled locked box located at the Benco administrative office.

The Personnel Director will process the vision reimbursement form and receipt, the Executive Director will approve the reimbursement to be made and the Finance Director will process the reimbursement check. During this process, all documents will be kept in a sealed envelope and latched up when not in use. Once the reimbursement check has been completed, the Personnel Director will place all documentation in a locked filing cabinet located in the Personnel Director's office, which remains locked at all time when the Personnel Director is absent. The Executive Director, Personnel Director and Finance Director are the only employees who have access to the key to the cabinet.

Once contacted by the Personnel Director, the vision reimbursement check can be collected by the employee.

Employees can request access and copies to their vision reimbursement records at any time.

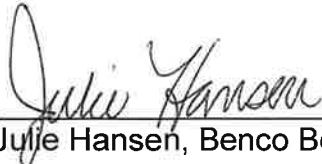
Employee will be provided with and required to sign a Notice of Privacy Practices document when the employee is eligible for and enrolled in Benco's health insurance plan. Benco will never ask the employee to waive their privacy rights as a condition of enrollment in Benco's health insurance plan.

Benco has established appropriate sanctions against employees of its workforce who fail to comply with its privacy policies and procedures. Any employee who fails to comply with HIPAA privacy practices will be placed on unpaid leave immediately until an

investigation is completed by the Executive Director within 5 days of discovering the failure to comply. The Executive Director will discipline the employee up to and including termination based on the findings of the investigation.

Benco will not take retaliatory action against an employee who makes a complaint with the plan sponsor, group health plan or HHS alleging a violation of the HIPAA privacy practices. Benco will report to the group health plan about any violations of its privacy policy and procedures and mitigate to the extent possible the harmful effect of any violation of its privacy policies. Benco will not use protected health information received in connection with an employee benefit plan when making employment related decisions.

If an employee has a complaint regarding HIPAA privacy practices the employee may contact the U.S. Department of Health and Human Services (HHS), Office of Civil Rights (OCR) at 1-800-368-1019. The employee can file a complaint over the phone or online with OCR.

Approved By:   
Julie Hansen, Benco Board President

Date: 7/21/22