

<b>Subject:</b>	<b>Security of Protected Health Information</b>		
<b>Policy No.:</b>	<b>E-2</b>		
<b>Original Issue Date:</b>	<b>Review Requirement:</b>	<b>Date of Last Review:</b>	<b>Date Last Revised:</b>
April 14, 2004	3 years	June 13, 2024	June 13, 2024
<b>Previous Revisions:</b>	07/10/2008, 09/12/2013, 05/13/2021		

**I. OBJECTIVE**

To establish the policy of Mountain Parks Electric, Inc. consistent with requirements of the Health Insurance Portability and Accountability Act of 1996 (HIPAA). To define, for administrative and legal purposes, the Cooperative’s practices, rights, and responsibilities with regard to protected health information of employees, employee’s dependents, directors, and retirees.

**II. POLICY**

- A. The Cooperative acknowledges its obligation to maintain certain confidential health information that is timely, accurate and complete for its intended purpose. Protected Health Information (PHI) is individually identifiable health information that is transmitted or maintained electronically or in any other form or medium. Individually identifiable health information is information that is created or received by the Cooperative that relates to the past, present, or future physical or mental health or condition of an individual, or the past, present or future payment for the provision of health care to an individual and identifies the individual or creates a reasonable basis to believe that the information would identify the individual.
- B. The Cooperative’s Manager of Human Resources shall serve as the Cooperative’s “Privacy Officer” and “Information Security Manager” as those offices are defined and to which responsibilities are assigned for compliance under law. The incumbent of this position shall be the “Authorized Employee” and recipient and custodian of any protected employee and beneficiary health information that may be presented to or possessed by the Cooperative. Individuals who are the subjects of such information shall be responsible for causing health care providers, insurers, and other sources, to provide the minimum necessary medical information to the Cooperative or the Privacy Officer for appropriate employer use and safekeeping.
- C. The Manager of Human Resources shall employ appropriate procedures and safeguards for maintenance of any protected health information presented to or possessed by the Cooperative and shall inform employees about the intended uses of personal information and their opportunity to review and correct such information. No employee, other than the Manager of Human Resources as the “Authorized Employee” shall have routine direct access to the protected health information except that “Responsible Employees” may have access to the extent and for the duration of their need to obtain such information to carry out the processes and transactions that are dependent on that information.

## **E-2 Security of Protected Health Information Directors Policies & Procedures**

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D. A “Responsible Employee” for the purposes of the terms and provisions of this Policy, is defined as an employee whose job duties may not require direct access by the employee to PHI, but in connection with the employee’s job position and in the course of carrying out the employee’s job responsibilities, the employee may become aware of facts and data which are or may be considered PHI. A Responsible Employee may also be an employee whose job duties include receiving, collecting, and/or organizing PHI on behalf of an Authorized Employee. Responsible Employees shall be identified by the Manager of Human Resources to be appropriately aware of applicable privacy rules and regulations and shall be instructed to be discreet and observe and follow all rules and regulations which are promulgated and intended to preserve the privacy of PHI.

### **III. RESPONSIBILITY**

The Manager of Human Resources shall exercise primary staff responsibility for administration of this policy.

The General Manager shall be responsible for providing the resources and oversight for administrative compliance with the requirements of applicable laws and regulations.

Liz McIntyre  
Liz McIntyre (Jun 18, 2024 19:39 MDT)

Jun 18, 2024

President


# E2 Security of Protected Health Information\_06.13.2024


Final Audit Report


2024-06-19


Created:	2024-06-18
By:	Jodi King (jking@mpei.com)
Status:	Signed
Transaction ID:	CBJCHBCAABAAuKolZGa1QvIadJ0Ug81Myd--l1wQTdBq


## "E2 Security of Protected Health Information\_06.13.2024" History


 Document created by Jodi King (jking@mpei.com)  
2024-06-18 - 5:45:22 PM GMT

 Document emailed to lmcintyre@mpei.com for signature  
2024-06-18 - 5:45:36 PM GMT

 Email viewed by lmcintyre@mpei.com  
2024-06-18 - 5:48:20 PM GMT

 Signer lmcintyre@mpei.com entered name at signing as Liz McIntyre  
2024-06-19 - 1:39:49 AM GMT

 Document e-signed by Liz McIntyre (lmcintyre@mpei.com)  
Signature Date: 2024-06-19 - 1:39:51 AM GMT - Time Source: server

 Agreement completed.  
2024-06-19 - 1:39:51 AM GMT