

**CITY OF TRAVERSE CITY  
OFFICE OF THE CITY MANAGER  
PERSONNEL POLICY NO. 221P**

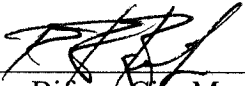
TITLE: HIPAA PRIVACY RULE HYBRID ENTITY  
DESIGNATION  
DEPARTMENTS AFFECTED: ALL  
EFFECTIVE DATE: JULY 2011

Pursuant to 45 cfr 164.105(a)(2)(iii)(C), it is hereby established that the City of Traverse City is a Hybrid Entity as that term is defined by 45 cfr164.103 as follows:

The City conducts both covered and non-covered functions under HIPAA. The health care components of the City are as follows:

1. The Traverse City Fire Department.
2. The Traverse City Police Department to the extent that it engages in covered functions.
3. The Department of Human Resources and City Manager's office to the extent that HIPAA applies or the City is obligated to follow HIPAA as a plan sponsor pursuant to the terms of its health care plans.
4. Departments that perform functions that would make the department a business associate of a health care component of the City if the two departments were separate legal entities when the department is performing business associate functions.

Only the above listed components of the City shall be obligated to comply fully with the HIPAA Privacy Rule. All other components of the City shall comply with HIPAA to the extent required by the Privacy Rule.

  
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R. Ben Bifoss, City Manager

History: Supersedes Executive Order #346 dated October 13, 2005

Cross Ref: Health Insurance Portability and Accountability Act of 1996 (HIPAA)