

**EMPLOYEE GROUP INSURANCE
TREATMENT OF PROTECTED HEALTH INFORMATION**

Section 9.1: Changes to Privacy Policies and Procedures	Page: 1 of 1
Effective Date: April 14, 2003	

POLICY

EGI shall change its privacy policies and procedures as needed if necessary to comply with changes in the law and shall incorporate any changes to its privacy policies and procedures into the written policies and procedures contained in this Manual.

9.1(1) Revisions to this Manual.

EGI shall promptly revise the policies and procedures in this Manual as necessary and appropriate to comply with changes to the HIPAA Privacy Standards or any other applicable law. EGI may at any time make any revision to the policies and procedures set forth in this Manual, as desirable to improve confidentiality practices, that does not violate the HIPAA Privacy Standards or any other applicable law.

9.1(2) Effective Date of Changes to EGI's Privacy Policies and Procedures.

- a. EGI shall implement any change to EGI's privacy policies and procedures as of the designated effective date of such change. A change's effective date cannot occur until (i) the change has been incorporated into the particular policies and procedures in this Manual; and (ii) if the change affects the content of EGI's notice of privacy practices, the notice has been revised to incorporate such change.
- b. If a change to EGI's privacy policies and procedures is required by law, EGI shall make a reasonable effort to implement such change by the compliance date of such law. To this end, EGI shall incorporate such change into the particular policies and procedures in this Manual and, if applicable, EGI's notice prior to the law's compliance date, if administratively feasible.

9.1(3) Communication of Changes to EGI's Privacy Policies and Procedures.

Following any material revision of the policies and procedures set forth in this Manual, EGI shall comply with any training obligation applicable under Section 8.2 of this Manual.

9.1(4) Documentation of Revisions to this Manual.

Following a revision to any policies and procedures in this Manual, EGI shall retain a copy of the applicable pre-revision terms of the applicable policies and procedures, including the date on which such terms were superseded. Such documentation shall be retained in accordance with Section 9.2 of this Manual.

REFERENCES/CITATIONS

45 C.F.R. § 164.530(i).

65 Fed. Reg. at 82,563, 82,748-49 (Dec. 28, 2000)