

<b>D. W. TOWER, INC.</b>		POLICIES AND PROCEDURES	
SUBJECT	ISSUED	REVISED	NO.
<b>HIPAA Policy</b>	05/01/2006		H-321
		APPROVED <i>Approved with Policy A-100</i> President	

**PURPOSE:** The purpose of this policy is to ensure compliance with the Health Insurance Portability and Accountability Act (HIPAA).

**POLICY:** The Company and all team members must comply with the Health Insurance Portability and Accountability Act (HIPAA) requirements including, but not limited to, the portability and continuity of health insurance coverage for employees, and the regulations governing privacy and Protected Health Information (PHI) of team members and customers or clients.

**SCOPE:** This policy applies to all team members of D. W. Tower, Inc., Inc.

**PROCEDURES:**

1. In compliance with HIPAA, D. W. Tower, Inc. will issue a certificate of coverage to team members who cancel their participation in the health plan for any reason. When presented to the administrator of another plan, the certificate of coverage provides documentation that will limit the new plan's pre-existing condition limitation period.
2. All records containing PHI (including, but not limited to, paper, electronic, computer hardware) pertaining to any team member, or to any of D. W. Tower, Inc.'s clients or their customers, must be protected from observation and disclosure in any format, including verbally and electronically, by any person or persons who do not have a legal, specific right to access that information.
3. All team members of the Company having actual or potential access to PHI will be required to complete training and comply with HIPAA regulations. Team members who work at client sites where customer PHI is common, such as hospitals or medical offices, must complete training within 30 days of assignment to the site. Any team member who has access to other team members' PHI must be authorized to do so as stated in their job description.
4. Any individual who requests PHI information about a team member or a client's customer, must have written authorization from the President to discuss or view any PHI.
5. Disposal of D. W. Tower, Inc.'s PHI records must use the appropriate equipment. Electronic media and equipment, such as computers, which contain

PHI must be appropriately thoroughly deleted before disposing of the computer or transferring the data to another computer.

6. Contact the Human Resources Department for further information about HIPPA and required training.

**Anyone found violating any portion of this policy may be subject to disciplinary procedures, up to and including termination.**

No changes will be made to this policy or any deviations authorized without the express written permission of the President.