

**MICHIGAN STATE UNIVERSITY**  
Compliance with the HIPAA Privacy Regulations  
Concerning Employee Health Plans

In compliance with 45 CFR 164.504(f), Michigan State University (MSU) makes the following commitments to the employee health plans:

1. MSU will use protected health information (PHI) as needed to carry out its responsibilities as plan sponsor of the employee health plans, provided such uses and disclosures are not inconsistent with the requirements of HIPAA.
2. MSU will not use or further disclose any PHI except as required to carry out its responsibilities as plan sponsor or as required by law.
3. MSU will require any subcontractor who assists it in carrying out the responsibilities of the plan sponsor, including any subcontractor to whom MSU provides PHI received from the employee health plans, to agree to the same restrictions and conditions that MSU must follow with respect to such information.
4. MSU will not use or disclose PHI for employment-related actions and decisions or in connection with any other benefit or employee benefit plan of MSU.
5. MSU will report to the employee health plans any use or disclosure of the information that is inconsistent with the uses or disclosures provided for or of which it becomes aware.
6. MSU will make available PHI to the individual plan member in accordance with § 164.524.
7. MSU will make available PHI to the employee health plans for amendment and incorporate any amendments to PHI in accordance with § 164.526.
8. MSU will make available the information required to provide an accounting of disclosures of PHI in accordance with § 164.528.
9. MSU will make internal practices, books, and records relating to the use and disclosure of PHI received from the employee health plans available to the Secretary for purposes of determining compliance by the employee health plans.
10. MSU, if feasible, will return or destroy all PHI received from the employee health plans and that MSU still maintains in any form and retain no copies of such information when no longer needed for the purpose for which disclosure was made, except that, if such return or destruction is not feasible, MSU will

limit further uses and disclosures to those purposes that make the return or destruction of the information infeasible.

11. While any employee of MSU who has a need to access or use PHI as MSU carries out its responsibilities as plan sponsor may receive PHI, PHI will generally only be disclosed to employees in Human Resources Benefits and then only the minimum necessary amount will be disclosed.
12. Any MSU employee accessing or using PHI may do so only in carrying out the plan administration functions that MSU performs for the employee health plans.
13. If there is any noncompliance with the required commitments to the employee health plans, the issues of noncompliance will immediately be brought to the attention of the Director of Human Resources and the University Privacy Official for immediate redress.