

## **HIPAA HYBRID ENTITY STATUS POLICY**

The School District of the City of Wyandotte ("School District" or "District"), based upon its self-administration of certain self-funded health plans, is a covered entity under the Health Insurance Portability and Accountability Act of 1996 ("HIPAA"). As its business activities include both covered and, primarily, non-covered functions, it has decided to designate itself a "hybrid entity" under HIPAA.

As a hybrid entity, the School District is divided into covered components and non-covered components. The District hereby designates the following as covered components within the hybrid entity:

Employee Group Health Plan.

Dental Expense Benefits Plan.

Employee Flexible Benefits Plans.

VSP-3 Plus Vision Plan (collectively, the "Plans").

The School District Business Office, insofar as office personnel provide administrative support to the Plans.

The terms used in this policy have the same meaning as those in HIPAA, the regulations at 45 CFR Parts 160, 162, and 164, and as provided in the District's HIPAA policy. The requirements of HIPAA, and the School District's policy in that regard, apply only to the covered components included within the hybrid entity.