



701 East Broadway, Columbia, Missouri 65201

Department Source: Public Health and Human Services

To: City Council

From: City Manager & Staff

Council Meeting Date: November 3, 2025

Re: Business Associate Agreements Authorized Signatory

Impacted Ward: Citywide

Executive Summary

An ordinance authorizing the signatory of the underlying agreement for services the authority to execute a business associates' agreement, substantially in compliance with a template form agreement, in instances when the City is contracting for services that may involve protected health information.

Discussion

When the City contracts for services that may involve access to protected health information (PHI), federal regulations under the Health Insurance Portability and Accountability Act (HIPAA) require a Business Associate Agreement (BAA) to ensure that contractors appropriately safeguard this information. Currently, each BAA must be individually approved by Council and executed, which can delay procurement and contracting processes.

To streamline this process, this ordinance would authorize the City Manager or the Purchasing Agent—whichever position holds signature authority for the underlying service agreement—to execute a BAA substantially in compliance with a pre-approved template form agreement. This authority would apply when contracting for services that may involve PHI, such as social services agreements and services purchased through cooperative agreements.

The standardized, pre-approved BAA template maintains compliance with HIPAA requirements and City procurement standards, and providing the City Manager or Purchasing Agent the authority to execute the BAA reduces administrative delays in contract execution.

Fiscal Impact

Short-Term Impact: No fiscal impact

Long-Term Impact: No fiscal impact

Strategic & Comprehensive Plan ImpactStrategic Plan Impacts:

Primary Impact: Not Applicable, Secondary Impact: Secondary, Tertiary Impact: Tertiary

Comprehensive Plan Impacts:

Primary Impact: Not Applicable, Secondary Impact: Secondary, Tertiary Impact: Tertiary

Legislative History

Date	Action
None	None

Suggested Council Action

Should council agree with staff recommendations an affirmative vote is in order.