

Chariton Valley Association Employee Health Plan

Privacy Policy

1708 E Laharpe St Kirksville, MO 63501

www.charitonvalley.org

Privacy Officer: Theresa Smead

Privacy Officer Phone: 660-665-1111 x220

Privacy Officer Email: tsmead@charitonvalley.org

A Guide To How We Protect Personal Information

This notice describes the privacy practices related to our employee health plan and our commitment to protecting the privacy and security of your personal and protected health information.

As a Plan Sponsor of employee health benefits, it is necessary for the Plan to receive and/or disclose personal and protected health information. We may disclose to health care providers, insurers, wellbeing vendors/providers, service providers and/or business associates. Such information may be made available through enrollment forms, medical claims, medical reports, coverage history and other sources and forms necessary to effectuate administration, treatment, payment and health care operations.

The information we may receive and/or disclose may include your name, Social Security number, address, date of birth, telephone number, marital status, gender, dependent information, claim information and employment information. While this list is not exhaustive, it gives you an idea of the type of information we are referring to in this notice.

HIPAA Compliance

The Health Insurance Portability and Accountability Act of 1996 ("HIPAA"), in part, established standards for healthcare privacy and security. Our Plan does receive protected health information ("PHI") that is subject to HIPAA. We are committed to protecting the privacy and security of personal and protected health information in a manner that is consistent with our Plan's legal obligations. We have developed a privacy and security compliance program that takes into account HIPAA privacy and security standards and reasonable practices.

Our Security Procedures

We understand that storing and transmitting data in a secure manner is essential. Your personal and protected health information is protected using physical, technical and administrative

safeguards to secure data against foreseeable risks, such as unauthorized use, access, disclosure, destruction and modification.

Our commitment to you

- We will safeguard any information shared with us. We will limit the collection and use of information to the minimum required to provide an excellent health plan.
- We will permit only authorized employees, who are trained in the proper handling of personal information, to have access to that information. We use physical, electronic, procedural and computer access controls.
- We will not share personal and protected health information for any purpose other than the administration and legal requirements of a group health plan.
- We may provide to you, upon a written request and as required by law, a record of certain disclosures made by the Plan.
- We will keep all personal and protected health information accurate to the best of our ability. You may request, in writing, that items of your personal information be changed if they are incorrect. We will correct the inaccurate information if possible.

When We May Disclose Information

In order to effectively manage our employee health plan, it is necessary that we disclose your personal and protected health information. We may make the following disclosures:

- We may disclose personal and protected health information to third parties with or without your written authorization.
- We may disclose personal and protected health information to business associates of our group health plan.
- We may disclose personal and protected health information to service providers.
- We may disclose personal and protected health information reasonably necessary to assist in detecting or preventing criminal activity, fraud, misrepresentation or nondisclosure in a health benefit or insurance transaction/function. We may disclose personal and protected health information to another person or entity in order to manage our group health plan or for purposes of allowing the other person or entity to administer a health benefit plan including, but not limited to, payment and health care operations.
- We may disclose personal and protected health information to a medical care institution, a medical professional, or to an individual to whom the information pertains.
- We may disclose personal and protected health information to an insurance regulatory authority, to an insurance commissioner, law enforcement or other governmental authority as required or permitted by law.
- We may disclose personal and protected and health information to comply with any law or legal process to which we are subject, including a facially valid administrative or judicial order, search warrant, subpoena or lawful discovery request.

- We may disclose personal and protected health information for the purpose of conducting an audit.
- We may disclose personal and protected health information to a professional peer review organization for the purpose of reviewing the service or conduct of a medical care institution or a medical care professional.
- We may disclose personal and protected health information to a person covered under a health benefit plan to provide information as to the status of a health benefit or insurance transaction/function.
- We may disclose personal and protected health information to a person or entity engaged to provide services to enable the performance of a health plan service, health benefit or claim administration function.
- We may disclose personal and protected health information to other non-affiliated third parties as permitted by law.
- We may disclose, at a future time, personal and protected health information not presently disclosed, but only as permitted by law.

In certain circumstances we may be required by law to obtain from you separate, written authorization in order to disclose personal and protected health information.

Revisions and Contact Information

Chariton Valley Association reserves the right to modify this Privacy Policy. It may be revised from time to time as we add new features and services, as laws change, and as the healthcare industry and privacy and security practices evolve. We display a date in the bottom left corner of this Privacy Policy so that it will be easier for you to know if changes have been made. We hope this notice has been helpful in explaining our Privacy Policy. For additional information about Chariton Valley Association commitment to privacy, please contact us at 660-665-1111 x220, Attention: Theresa Smead Privacy Officer, tsmead@charitonvalley.org.

Effective Date: January 1, 2023