

## **Grinnell College**

### **Disclosures of Protected Health Information**

The [Insert Plan Name] (the “Plan”) will disclose protected health information (“PHI”) to Grinnell College (the “College”) only to the extent permitted by the administrative and simplification provisions of the Health Insurance Portability and Accountability Act of 1996 and its regulations (the “Privacy Rule” and the “Security Rule”). The following provisions will be interpreted and applied in a manner consistent with the Privacy Rule and the Security Rule.

- The College will implement administrative, physical, and technical safeguards that reasonably and appropriately protect the confidentiality, integrity, and availability of the electronic PHI that it creates, receives, maintains, or transmits on behalf of the Plan.
- PHI will not be used or further disclosed, except as permitted or required by the Plan document or as required by law.
- We will ensure that any agent, including any subcontractor, to whom the College provides PHI received from the Plan, agrees to the same restrictions and conditions that apply to the College with respect to PHI, including the implementation of reasonable and appropriate security measures to protect electronic PHI.
- The College will not use or disclose PHI for employment-related actions or decisions or in connection with any other benefit or employee benefit plan of the College unless authorized by an individual.
- The College will report to the Plan, any use or disclosure of PHI that is inconsistent with the uses and disclosures stated herein promptly upon learning of such inconsistent use or disclosure, including any security incident of which it becomes aware.
- The College will make PHI available to individuals in accordance with the Privacy Rule’s access requirements as set forth in 45 Code of Federal Regulations § 164.524.
- The College will make PHI available for amendment, and will incorporate any amendments to PHI in accordance with 45 Code of Federal Regulations § 164.526.
- The College will track disclosures of PHI so that it can provide the information required by the Plan to account for disclosures in accordance with 45 Code of Federal Regulations § 164.528.
- The College will make its internal practices, books, and records relating to the use and disclosure of PHI received from the Plan available to the Secretary of the U.S. Department of Health and Human Services to determine compliance with 45 Code of Federal Regulations Parts 160-64.

- The College will ensure that adequate separation between the Plan and the College is established and supported by reasonable and appropriate security measures with respect to electronic PHI.
  
- Access to and use and disclosure of PHI will be limited to only those employees of the College who have a need for the PHI in conjunction with their performance of plan administration functions for the Plan, including any employee who receives PHI relating to payment under, health care operations of, or other matters pertaining to the Plan in the ordinary course of business. The College anticipates that the following employees will have access to PHI in connection with the administration of the Plan.
  - James Mulholland, Director of Compensation and Risk Management
  - Julie Dressler, Staff Accountant
  - Mary Greiner, Assistant Vice President of Human Resources
  - Stacy Koehler, Associate Director of Human Resources
  - Jana Johnson, Associate Director of Human Resources
  - Nancy Combs, Controller and Assistant Treasurer
  - Shannon Nowotny, Administrative Support Assistant

If the persons described above do not comply with the conditions set forth in this Notice, the College will provide for a mechanism for resolving issues of noncompliance, including appropriate disciplinary sanctions.

- When PHI received from the Plan is no longer needed for the Plan administrative functions for which the disclosure was made, the College will, if feasible, return or destroy all PHI, in whatever form or medium received from the Plan, including all copies of any data or compilations derived from and/or revealing an individual's identity. If it is not feasible to return or destroy all the PHI, the College will limit the use of disclosure of PHI it cannot feasibly return or destroy to those purposes that make the return or destruction of the information infeasible.