COLUMBIA PUBLIC SCHOOL DISTRICT
IMPORTANT NOTICE
COMPREHENSIVE NOTICE OF PRIVACY POLICY AND PROCEDURES

THIS NOTICE DESCRIBES HOW MEDICAL INFORMATION ABOUT YOU MAY BE USED AND DISCLOSED AND HOW YOU CAN GET ACCESS TO THIS INFORMATION. PLEASE REVIEW IT CAREFULLY.

This Notice is provided to you on behalf of:

Columbia Public School District Medical Plan
Columbia Public School District Dental Plan
Columbia Public School District Cafeteria Plan

These plans comprise what is called an “Affiliated Covered Entity,” and are treated as a single plan for purposes of this Notice and the privacy rules that require it. For purposes of this Notice, we’ll refer to these plans as a single “Plan.”

The Plan’s Duty to Safeguard Your Protected Health Information.

Individually identifiable information about your past, present, or future health or condition, the provision of health care to you, or payment for the health care is considered “Protected Health Information” (“PHI”). The Plan is required to extend certain protections to your PHI, and to give you this Notice about its privacy practices that explains how, when and why the Plan may use or disclose your PHI. Except in specified circumstances, the Plan may use or disclose only the minimum necessary PHI to accomplish the purpose of the use or disclosure.

The Plan is required to follow the privacy practices described in this Notice, though it reserves the right to change those practices and the terms of this Notice at any time. If it does so, and the change is material, you will receive a revised version of this Notice either by hand delivery, mail delivery to your last known address, or some other fashion. This Notice, and any material revisions of it, will also be provided to you in writing upon your request (contact the Plan’s Privacy Official, described below), and will be posted on any website maintained by Columbia Public School District that describes benefits available to employees and dependents.

You may also receive one or more other privacy notices, from insurance companies that provide benefits under the Plan. Those notices will describe how the insurance companies use and disclose PHI, and your rights with respect to the PHI they maintain.

How the Plan May Use and Disclose Your Protected Health Information.

The Plan uses and discloses PHI for a variety of reasons. For its routine uses and disclosures it does not require your authorization, but for other uses and disclosures, your authorization (or the authorization of your personal representative; e.g., a person who is your custodian, guardian, or has your power-of-attorney) may be required. The following offers more description and examples of the Plan’s uses and disclosures of your PHI.

- **Uses and Disclosures Relating to Treatment, Payment, or Health Care Operations.**
- **Treatment:** Generally, and as you would expect, the Plan is permitted to disclose your PHI for purposes of your medical treatment. Thus, it may disclose your PHI to doctors, nurses, hospitals, emergency medical technicians, pharmacists and other health care professionals where the disclosure is for your medical treatment. For example, if you are injured in an accident, and it’s important for your treatment team to know your blood type, the Plan could disclose that PHI to the team in order to allow it to more effectively provide treatment to you.
- **Payment:** Of course, the Plan’s most important function, as far as you are concerned, is that it pays for all or some of the medical care you receive (provided the care is covered by the Plan). In the course of its payment operations, the Plan receives a substantial amount of PHI about you. For example, doctors, hospitals and pharmacies that provide you care send the Plan detailed information about the care they provided, so that they can be paid for their services. The Plan may also share your PHI with other plans, in certain cases. For example, if you are covered by more than one health care plan (e.g., covered by this Plan, and your spouse’s plan, or covered by the plans covering your father and mother), we may share your PHI with the other plans to coordinate payment of your claims.
• **Health care operations:** The Plan may use and disclose your PHI in the course of its “health care operations.” For example, it may use your PHI in evaluating the quality of services you received, or disclose your PHI to an accountant or attorney for audit purposes. In some cases, the Plan may disclose your PHI to insurance companies for purposes of obtaining various insurance coverage.

• **Other Uses and Disclosures of Your PHI Not Requiring Authorization:** The law provides that the Plan may use and disclose your PHI without authorization in the following circumstances:

  - **To the Plan Sponsor:** The Plan may disclose PHI to the employers (such as Columbia Public School District) who sponsor or maintain for the benefit of employees and dependents. However, the PHI may only be used for limited purposes, and may not be used for purposes of employment-related actions or decisions or in connection with any other benefit or employee benefit plan of the employers. PHI may be disclosed to: the human resources or employee benefits department for purposes of enrollments and disenrollments, census, claim resolutions, and other matters related to Plan administration; payroll department for purposes of ensuring appropriate payroll deductions and other payments by covered persons for their coverage; information technology department, as needed for preparation of data compilations and reports related to Plan administration; finance department for purposes of reconciling appropriate payments of premium to and benefits from the Plan, and other matters related to Plan administration; internal legal counsel to assist with resolution of claim, coverage and other disputes related to the Plan’s provision of benefits; check register for the purpose of bank reconciliation.

  - **Required by law:** The Plan may disclose PHI when a law requires that it report information about suspected abuse, neglect or domestic violence, or relating to suspected criminal activity, or in response to a court order. It must also disclose PHI to authorities who monitor compliance with these privacy requirements.

  - **Judicial and/or administrative proceedings:** The Plan may disclose PHI at the request of a court order or subpoena in a judicial or administrative proceeding.

  - **Law Enforcement purposes:** The Plan may disclose PHI to law enforcement officials for a law enforcement purpose in the following situations: when required by law; for identification and location purposes; if you are suspected to be a victim of a crime; to report suspicion of death by criminal conduct; and in the case of an emergency.

  - **For public health activities:** The Plan may disclose PHI when required to collect information about disease or injury, or to report vital statistics to the public health authority.

  - **For health oversight activities:** The Plan may disclose PHI to agencies or departments responsible for monitoring the health care system for such purposes as reporting or investigation of unusual incidents.

  - **Relating to decedents:** The Plan may disclose PHI relating to an individual’s death to coroners, medical examiners or funeral directors, and to organ procurement organizations relating to organ, eye, or tissue donations or transplants.

  - **For research purposes:** In certain circumstances, and under strict supervision of a privacy board, the Plan may disclose PHI to assist medical and psychiatric research.

  - **To avert threat to health or safety:** In order to avoid a serious threat to health or safety, the Plan may disclose PHI as necessary to law enforcement or other persons who can reasonably prevent or lessen the threat of harm.

  - **For specific government functions:** The Plan may disclose PHI of military personnel and veterans in certain situations, to correctional facilities in certain situations, to government programs relating to eligibility and enrollment, and for national security reasons.

  - **To Business Associates:** The Plan may disclose PHI to its business associates to perform certain business functions or provide certain business services to the Plan. For example, we may use another company to compile statistics to explain the premiums that are charged. All of our business associates are required to maintain the privacy and confidentiality of your PHI. In addition, at the request of your health care providers, the Plan may disclose PHI to their business associates for purposes of performing certain business functions or health care services on their behalf. For example, we may disclose PHI to a business associate of Medicare for purposes of medical necessity review and audit.

  - **For workers’ compensation claims:** The Plan may disclose PHI as authorized and to the extent necessary to comply with laws relating to workers’ compensation or other similar programs, established by law, that provide benefits for work-related injuries or illness without regard to fault.

  - **Uses and Disclosures Requiring Authorization:** For uses and disclosures beyond treatment, payment and operations purposes, and for reasons not included in one of the exceptions described above, the Plan is required to have your written authorization. Your authorizations can be revoked at any time to stop future uses and disclosures, except to the extent that the Plan has already undertaken an action in reliance upon your
authorization. Your consent is required for the following uses and disclosures and will be made only with written authorization from you:

1) If you have paid for services out-of-pocket, in full, you have the right to request with written authorization that the Plan not disclose PHI related solely to those services to a health plan. The Plan must accommodate your request, except where the Plan is required by law to make a disclosure.

2) Uses and disclosures of psychotherapy notes (if recorded by a covered entity).

3) The use and disclosure of PHI for marketing purposes, including subsidized treatment communications.

4) Disclosures that constitute a sale of PHI.

5) If the Plan sends fundraising communications to you, you have the right to opt out of such fundraising communications with each solicitation.

To send your written authorization to the Plan, please send it to the Privacy Official (see below).

You may revoke any such authorization at any time in writing, unless (1) the Plan has already taken action in reliance upon the authorization you have provided; or (2) if the authorization was obtained as a condition of obtaining insurance coverage and other law(s) provides the insurer the right to contest a claim under the policy.

**Uses and Disclosures Requiring You to have an Opportunity to Object:** The Plan may share PHI with your family, friend or other person involved in your care, or payment for your care. We may also share PHI with these people to notify them about your location, general condition, or death. However, the Plan may disclose your PHI only if it informs you about the disclosure in advance and you do not object (but if there is an emergency situation and you cannot be given your opportunity to object, disclosure may be made if it is consistent with any prior expressed wishes and disclosure is determined to be in your best interests; you must be informed and given an opportunity to object to further disclosure as soon as you are able to do so).

**Your Rights Regarding Your Protected Health Information.**

You have the following rights relating to your protected health information:

- **To request restrictions on uses and disclosures:** You have the right to ask that the Plan limit how it uses or discloses your PHI. The Plan will consider your request, but is not legally bound to agree to the restriction. To the extent that its agrees to any restrictions on its use or disclosure of your PHI, it will put the agreement in writing and abide by it except in emergency situations. The Plan cannot agree to limit uses or disclosures that are required by law.

- **To choose how the Plan contacts you:** You have the right to ask that the Plan send you information at an alternative address or by an alternative means. The Plan must agree to your request as long as it is reasonably easy for it to accommodate the request.

- **To inspect and copy your PHI:** Unless your access is restricted for clear and documented treatment reasons, you have a right to see your PHI in the possession of the Plan or its vendors if you put your request in writing. The Plan, or someone on behalf of the Plan, will respond to your request, normally within 30 days. If your request is denied, you will receive written reasons for the denial and an explanation of any right to have the denial reviewed. If you want copies of your PHI, a charge for copying may be imposed but may be waived, depending on your circumstances. You have a right to choose what portions of your information you want copied and to receive, upon request, prior information on the cost of copying.

- **To request amendment of your PHI:** If you believe that there is a mistake or missing information in a record of your PHI held by the Plan or one of its vendors, you may request, in writing, that the record be corrected or supplemented. The Plan or someone on behalf of the Plan will respond to your request, normally within 60 days of receiving your request. The Plan may deny the request if it is determined that the PHI is: (i) correct and complete; (ii) not created by the Plan or its vendor and/or not part of the Plan’s or vendor’s records; or (iii) not permitted to be disclosed. Any denial will state the reasons for denial and explain your rights to have the request and denial, along with any statement in response that you provide, appended to your PHI. If the request for amendment is approved, the Plan or vendor, as the case may be, will change the PHI and so inform you, and tell others that need to know about the change in the PHI.

- **To find out what disclosures have been made:** You have a right to get a list of when, to whom, for what purpose, and what portion of your PHI has been released by the Plan and its vendors, other than instances of disclosure for which you gave authorization, or instances where the disclosure was made to you or your family. In addition, the disclosure list will not include disclosures for treatment, payment, or health care
operations. The list also will not include any disclosures made for national security purposes, to law
enforcement officials or correctional facilities, or before the date the federal privacy rules applied to the Plan.
You will normally receive a response to your written request for such a list within 60 days after you make the
request in writing. Your request can relate to disclosures going as far back as six years. There will be no
charge for up to one such list each year. There may be a charge for more frequent requests.

- To Request Confidential Communications: You may request to receive your PHI by alternative means or
  at an alternative location if you reasonable believe that other disclosure could pose a danger to you. For
  example, you may only want to have PHI sent by mail or to an address other than your home. While we are
  not required to agree to all requests, the Plan will accommodate all reasonable requests for confidential
  communications. For more information about exercising these rights, contact the Privacy Officer (see
  below).

- To be Notified of a Breach: You have the right to be notified in the event that the Plan (or a Business
  Associate of the Plan) discovers a breach of unsecured PHI, unless there is a demonstration, based on a risk
  assessment, that there is a low probability that the PHI has been compromised. You will be notified without
  unreasonable delay and no later than 60 days after discovery of the breach. Such notification will include
  information about what happened and what can be done to mitigate any harm.

- To a Paper Copy of This Notice: You have the right to a paper copy of this Notice, even if you have agreed
  to accept this Notice electronically. To obtain such a copy, please contact the Plan’s Privacy Officer (see
  below).

How to Complain about the Plan’s Privacy Practices.

If you think the Plan or one of its vendors may have violated your privacy rights, or if you disagree with a
decision made by the Plan or a vendor about access to your PHI, you may file a complaint with the person listed in
the section immediately below. You also may file a written complaint with the Secretary of the U.S. Department
of Health and Human Services. The law does not permit anyone to take retaliatory action against you if you make
such complaints.

Contact Person for Information, or to Submit a Complaint.

If you have questions about this Notice please contact the Plan’s Privacy Official or Deputy Privacy Official(s)
(see below). If you have any complaints about the Plan’s privacy practices or handling of your PHI, please
contact the Plan’s Privacy Official (see below).

Privacy Official.

The Plan’s Privacy Official, the person responsible for ensuring compliance with this Notice, is:

Linda Quinley
Chief Financial Officer
Telephone Number: (573) 214-3700

The Plan’s Deputy Privacy Official(s) is/are:

David Martin (573) 214-3700
Jane Harmon (573) 214-3710

Effective Date: The effective date of this Notice is July 1, 2006.

Revised Date: This Notice has been revised as of September 20, 2013.