

**EMPLOYEE HEALTH BENEFIT PLAN: USE AND DISCLOSURE
OF PROTECTED HEALTH INFORMATION PROCEDURE**

PROCEDURE:

1. The Privacy Official or Designee(s), Plan Administrator, and Employee Benefits Manager will review BHHF's policies, procedures, training materials, plan documents, and other documents that relate to the privacy of protected health information, and modify them as necessary, and write new policies and procedures as necessary, to make them applicable to the group health plan. Amendments to plan documents will be reviewed by the Designated Attorney or Designee(s).
2. The Privacy Official or Designee(s), Plan Administrator, and the Director of Human Resources will assure that appropriate training is provided to all members of the workforce who have access to PHI that is in the custody of the group health plan, or which is received from the group health plan by BHHF in its capacity as plan sponsor.
3. The Privacy Official or Designee(s), Plan Administrator, and an official responsible for data and system security will assure that appropriate access safeguards are implemented.
4. The Privacy Official or Designee(s), Plan Administrator, and Employee Benefits Manager will ensure that any future changes in the group health plan are reflected, as appropriate, in the applicable policies and procedures.
5. The Plan Administrator and Employee Benefits Manager will ensure that the group health plan is operated in accordance with its plan documents, and with the policies and procedures adopted by BHHF to govern its operation and protect its confidential information, including PHI.

REFERENCE:

45 CFR 164.504(f)

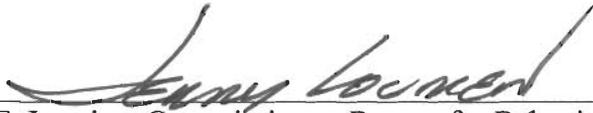
See also:

EMPLOYEE HEALTH BENEFIT PLAN: APPLICABILITY OF FEDERAL
PRIVACY REGULATIONS

STANDARDS FOR EMPLOYEE WELFARE BENEFIT PLAN
DOCUMENTS: PRIVACY OF PROTECTED HEALTH INFORMATION
NOTICE OF PRIVACY PRACTICES

Effective Date: 4/14/03

Revised Dates:

A handwritten signature in black ink, appearing to read "Jerome Lovrien", written over a horizontal line.

Jerome E. Lovrien, Commissioner, Bureau for Behavioral Health and Health Facilities