

Effective Date of this Notice: 4/14/04

Bryn Mawr College

NOTICE OF PRIVACY PRACTICES

As Required by the Privacy Regulations Created as a Result of the Health Insurance Portability and Accountability Act of 1996 (HIPAA)

THIS NOTICE DESCRIBES HOW HEALTH INFORMATION ABOUT YOU (AS AN EMPLOYEE OF THE COLLEGE) MAY BE USED AND DISCLOSED, AND HOW YOU CAN GET ACCESS TO YOUR INDIVIDUALLY IDENTIFIABLE HEALTH INFORMATION.

PLEASE REVIEW THIS NOTICE CAREFULLY.

A. OUR COMMITMENT TO YOUR PRIVACY

Bryn Mawr College (the College) is dedicated to maintaining the privacy of your protected health information (PHI). In conducting our business, we will create records regarding you and services we provide to you. We are required by law to maintain the confidentiality of health information that identifies you. We are also required by law to provide you with this notice of our legal duties and the privacy practices that we maintain at the College concerning your PHI. By federal and state law, we must follow the terms of the Notice of Privacy Practices that we have in effect at the time.

We realize that these laws are complicated, but we must provide you with the following important information:

- How we may use and disclose your PHI
- Your privacy rights in your PHI
- Our obligations concerning the use and disclosure of your PHI

The terms of this notice apply to all records containing your PHI that are created or retained by the College. We reserve the right to revise or amend this Notice of Privacy Practices. Any revision or amendment to this notice will be effective for all of your records that the College has created or maintained in the past, and for any of your records that we may create or maintain in the future. The College will post a copy of our current Notice in Human Resources, and you may request a copy of our most current Notice at any time.

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B. IF YOU HAVE QUESTIONS ABOUT THIS NOTICE, PLEASE CONTACT:

**Bryn Mawr College Department of Human Resources
610-526-5261**

C. WE MAY USE AND DISCLOSE YOUR PROTECTED HEALTH INFORMATION (PHI) IN THE FOLLOWING WAYS:

The following categories describe the different ways in which we may use and disclose your PHI.

- 1. Payment.** The College may use and disclose your PHI in order to certify that you are eligible for benefits (and for what range of benefits), and we may provide the insurer with details regarding your treatment to determine if the insurer will cover, or pay for, your treatment.
- 2. Health-Related Benefits and Services.** The College may use and disclose your PHI to inform you of health-related benefits or services that may be of interest to you.
- 3. Disclosures Required By Law.** The College will use and disclose your PHI when we are required to do so by federal, state or local law.

D. USE AND DISCLOSURE OF YOUR PHI IN CERTAIN SPECIAL CIRCUMSTANCES

The following categories describe unique scenarios in which we may use or disclose your protected health information:

- 1. To the College.** The College may disclose your PHI to designated College personnel so they can carry out administrative functions, including the uses and disclosures described in this notice. Such disclosures will be made only to the College's Plan Administrator and/or members of the College's Human Resources Department. These individuals will protect the privacy of your health information and ensure it is used only as described in this notice or as permitted by law. Please note that health information collected by the College from other sources, for example under the Family and Medical Leave Act, Americans with Disabilities Act or Workers' Compensation is not protected under HIPAA although this type of information may be protected under other federal or state laws.

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- 2. Lawsuits and Similar Proceedings.** The College may use and disclose your PHI in response to a court or administrative order, if you are involved in a lawsuit or similar proceeding. We also may disclose your PHI in response to a discovery request, subpoena, or other lawful process by another party involved in the dispute, but only if we have made an effort to inform you of the request or to obtain an order protecting the information the party has requested.
- 3. National Security.** The College may disclose your PHI to federal officials for intelligence and national security activities authorized by law.
- 4. Workers' Compensation.** The College may release your PHI for workers' compensation and similar programs.

E. YOUR RIGHTS REGARDING YOUR PHI

You have the following rights regarding the PHI that we maintain about you:

- 1. Confidential Communications.** You have the right to request that the College communicate with you about your health and related issues in a particular manner or a certain location. The College will try to accommodate reasonable requests. You do not need to give a reason for your request.
- 2. Requesting Restrictions.** You have the right to request a restriction in our use or disclosure of your PHI. Additionally, you have the right to request that we restrict our disclosure of your PHI to only certain individuals involved in your care or the payment for your care, such as family members or friends. In order to request a restriction in our use or disclosure of your PHI, you must make your request in writing to the Director of Human Resources, Bryn Mawr College. Your request must describe in a clear and concise fashion:
 - (a) the information you wish restricted;
 - (b) whether you are requesting to limit the College's use, disclosure or both; and
 - (c) to whom you want the limits to apply.
- 3. Inspection and Copies.** You have the right to inspect and obtain a copy of the PHI that may be used by the College. You must submit your request in writing to the Director of Human Resources, Bryn Mawr College, in order to inspect and/or obtain a copy of your PHI. The College may charge a fee for the costs of copying, mailing, labor and supplies associated with your request. The College may deny your request to inspect and/or copy in certain limited circumstances; however, you may request a review of our denial. Another professional chosen by us will conduct reviews.

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- 4. Amendment.** You may ask us to amend your health information if you believe it is incorrect or incomplete, and you may request an amendment for as long as the information is kept by or for the College. To request an amendment, your request must be made in writing and submitted to the Director of Human Resources, Bryn Mawr College. You must provide us with a reason that supports your request for amendment. The College will deny your request if you fail to submit your request (and the reason for your request) in writing. Also, we may deny your request if you ask us to amend information that is in our opinion: (a) accurate and complete; (b) not part of the PHI kept by or for the College; (c) not part of the PHI which you would be permitted to inspect and copy; or (d) not created by the College, unless the individual or entity that created the information is not available to amend the information.
- 5. Accounting of Disclosures.** All of our employees have the right to request an “accounting of disclosures.” An “accounting of disclosures” is a list of certain non-routine disclosures the College has made of your PHI for non-payment or non-operations purposes. Use of your PHI as part of the routine operation of the College is not required to be documented. In order to obtain an accounting of disclosures, you must submit your request in writing to the Director of Human Resources, Bryn Mawr College. All requests for an “accounting of disclosures” must state a time period, which may not be longer than six (6) years from the date of disclosure and may not include dates before April 14, 2004. The first list you request within a 12-month period is free of charge, but the College may charge you for additional lists within the same 12-month period. The College will notify you of the costs involved with additional requests, and you may withdraw your request before you incur any costs.
- 6. Right to Obtain a Paper Copy of This Notice.** You are entitled to receive a paper copy of our Notice of Privacy Practices. You may ask us to give you a copy of this notice at any time. To obtain a paper copy of this notice, contact the Department of Human Resources, Bryn Mawr College.
- 7. Right to File a Complaint.** If you believe your privacy rights have been violated, you may file a complaint with the College or with the Secretary of the Department of Health and Human Services. To file a complaint with the College, contact the Director of Human Resources, Bryn Mawr College. All complaints must be submitted in writing. **You will not be penalized for filing a complaint.**
- 8. Right to Provide an Authorization for Other Uses and Disclosures.** The College will obtain your written authorization for uses and disclosures that are not identified by this notice or permitted by applicable law. Any authorization you provide to us regarding the use and disclosure of your PHI may be revoked at any time in writing.

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After you revoke your authorization, we will no longer use or disclose your PHI for the reasons described in the authorization.

Again, if you have any questions regarding this notice or our health information privacy policies, please contact the Director of Human Resources, Bryn Mawr College, 610-526-5261.

Bryn Mawr College

**RECEIPT OF NOTICE OF PRIVACY PRACTICES
WRITTEN ACKNOWLEDGEMENT FORM**

I, _____, have received a copy of Bryn Mawr College's
Employee Name
Notice of Privacy Practices.

Employee's Signature

Date

Print Name of Employee