



Employee Required Notices Packet

IMPORTANT NOTICES REGARDING YOUR HEALTH INSURANCE RIGHTS

Notification Checklist

	Received Form
Women's Health and Cancer Rights Act Notice	<input type="checkbox"/>
Special Enrollment Rights Notice	<input type="checkbox"/>
Michelle's Law Notice	<input type="checkbox"/>
Pre-existing Condition Exclusion and Certificate of Creditable Coverage Notice	<input type="checkbox"/>
General Notice of COBRA Rights	<input type="checkbox"/>
CHIPRA Notice	<input type="checkbox"/>
Privacy Practices (HIPAA) and Health Insurance Rights Notice	<input type="checkbox"/>
FMLA Rights Notice	<input type="checkbox"/>
Medicare Part D Creditable Notice	<input type="checkbox"/>
Summary of Benefits and Coverage	<input type="checkbox"/>
Marketplace Coverage Options Notice	<input type="checkbox"/>

I acknowledge receipt of these notices, regardless of my enrollment in the benefit plan.

Employee Signature

Date

Employee Name (Printed)

Department

IMPORTANT: All benefit eligible employees must acknowledge receipt of each of the notices listed above, regardless of participation in the county's benefit plans. Please complete, sign and return to:

Yvonne, Smith, Benefit Office

IMPORTANT NOTICES REGARDING YOUR HEALTH INSURANCE RIGHTS

Women's Health and Cancer Rights Act of 1998 (WHCRA)

If you have had or are going to have a mastectomy, you may be entitled to certain benefits under the Women's Health and Cancer Rights Act of 1998 (WHCRA). For an individual receiving mastectomy-related benefits, coverage will be provided in a manner determined by consultation with the attending physician and the patient for:

- All stages of reconstruction of the breast on which the mastectomy was performed
- Surgery and reconstruction of the other breast to produce a symmetrical appearance
- Prostheses
- Treatment of physical complications of the mastectomy, including lymphedema in a manner determined in consultation with the attending physician and the patient

Special Enrollment

If you are declining enrollment for you or your dependents (including your spouse) because of other health insurance coverage, you may, in the future, be able to enroll you or your dependents in the plan, provided that your request enrollment within 30 days after your other coverage ends (COBRA or state continuation coverage ends, divorce, legal separation, death, termination of employment or reduction in hours worked; or because the employer contributions cease).

In addition, if you have a new dependent as a result of marriage, birth, adoption or placement for adoption, you may be able to enroll you and your dependents, provided you request enrollment within 30 days after the marriage, birth, adoption or placement for adoption.

If you decline enrollment for yourself or for your dependents (including your spouse) while Medicaid coverage or coverage under a state children's health insurance program is in effect, you may be able to enroll yourself and your dependents if you or your dependents lose eligibility for that other coverage. However, you must request enrollment within 60 days after your or your dependents' coverage ends under Medicaid or a state children's health insurance program.

If you or your dependents (including your spouse) become eligible for a state premium assistance subsidy from Medicaid or through a state children's health insurance program with respect to coverage under this plan, you may be able to enroll yourself and your dependents in this plan. However, you must request enrollment within 60 days after your or your dependents' determination of eligibility for such assistance.

If you have any questions, please contact Yvonne Smith at 513-732-7981.

Michelle's Law (2010)

Michelle's Law prohibits the termination of health coverage if the child takes a medically necessary leave of absence from school or changes to part-time status. The leave of absence must:

- Be medically necessary (and certified by a physician as medically necessary)
- Commence while the child is suffering from a serious illness or injury
- Cause the child to lose student status for the purposes of coverage under the plan (either from an absence from school or reducing his/her course load to part time)

To take advantage of the extension, the child must be enrolled in the group health plan by being a student at a post-secondary educational institution immediately before the first day of the leave.

Coverage must extend for one year after the first day of the leave (or, if earlier, the date coverage would otherwise terminate under the plan). The student on leave is entitled to the same benefits as if they had not taken a leave. If coverage changes during the student's leave, then this law applies in the same manner as the prior coverage.

Pre-existing Condition Exclusion and Certificate of Creditable Coverage Information

Recent changes in Federal law may affect your health coverage if you are enrolled or become eligible to enroll in health coverage that excludes coverage for pre-existing medical conditions.

The Health Insurance Portability and Accountability Act of 1996 (HIPAA) limits the circumstances under which coverage may be excluded for medical conditions present before you enroll. Under the law, a pre-existing condition exclusion generally may not be imposed for more than 12 months (18 months for a late enrollee). The 12-month (or 18-month) exclusion period is reduced by your prior health coverage. You are entitled to a certificate that will show evidence of your prior health coverage. If you buy health insurance other than through an employer group health plan, a certificate of prior coverage may help you obtain coverage without a pre-existing condition exclusion. Contact your state insurance department for further information.

You have the right to receive a certificate of prior health coverage. You may need to provide other documentation for earlier periods of health care coverage. Check with your new plan administrator to see if your new plan excludes coverage for pre-existing conditions, and if you need to provide a certificate of other documentation of your previous coverage.

To obtain a certificate:

Humana will mail a certificate of prior health coverage to your home after employment at Clermont County is terminated.

The certificate must be provided to you promptly. You may also request certificates for any of your dependents (including your spouse) who were enrolled under your health coverage.

Continuation Coverage Rights Under COBRA

Introduction

You're getting this notice because you recently gained coverage under a group health plan (the Plan). This notice has important information about your right to COBRA continuation coverage, which is a temporary extension of coverage under the Plan. **This notice explains COBRA continuation coverage, when it may become available to you and your family, and what you need to do to protect your right to get it.** When you become eligible for COBRA, you may also become eligible for other coverage options that may cost less than COBRA continuation coverage.

The right to COBRA continuation coverage was created by a federal law, the Consolidated Omnibus Budget Reconciliation Act of 1985 (COBRA). COBRA continuation coverage can become available to you and other members of your family when group health coverage would otherwise end. For more information about your rights and obligations under the Plan and under federal law, you should review the Plan's Summary Plan Description or contact the Plan Administrator.

You may have other options available to you when you lose group health coverage. For example, you may be eligible to buy an individual plan through the Health Insurance Marketplace. By enrolling in coverage through the Marketplace, you may qualify for lower costs on your monthly premiums and lower out-of-pocket costs. Additionally, you may qualify for a 30-day special enrollment period for another group health plan for which you are eligible (such as a spouse's plan), even if that plan generally doesn't accept late enrollees.

What is COBRA continuation coverage?

COBRA continuation coverage is a continuation of Plan coverage when it would otherwise end because of a life event. This is also called a "qualifying event." Specific qualifying events are listed later in this notice. After a qualifying event, COBRA continuation coverage must be offered to each person who is a "qualified beneficiary." You, your spouse, and your dependent children could become qualified beneficiaries if coverage under the Plan is lost because of the qualifying event. Under the Plan, qualified beneficiaries who elect COBRA continuation coverage must pay for COBRA continuation coverage.

If you're an employee, you'll become a qualified beneficiary if you lose your coverage under the Plan because of the following qualifying events:

- Your hours of employment are reduced, or
- Your employment ends for any reason other than your gross misconduct.

If you're the spouse of an employee, you'll become a qualified beneficiary if you lose your coverage under the Plan because of the following qualifying events:

- Your spouse dies;
- Your spouse's hours of employment are reduced;

- Your spouse's employment ends for any reason other than his or her gross misconduct;
- Your spouse becomes entitled to Medicare benefits (under Part A, Part B, or both); or
- You become divorced or legally separated from your spouse.

Your dependent children will become qualified beneficiaries if they lose coverage under the Plan because of the following qualifying events:

- The parent-employee dies;
- The parent-employee's hours of employment are reduced;
- The parent-employee's employment ends for any reason other than his or her gross misconduct;
- The parent-employee becomes entitled to Medicare benefits (Part A, Part B, or both);
- The parents become divorced or legally separated; or
- The child stops being eligible for coverage under the Plan as a "dependent child."

When is COBRA continuation coverage available?

The Plan will offer COBRA continuation coverage to qualified beneficiaries only after the Plan Administrator has been notified that a qualifying event has occurred. The employer must notify the Plan Administrator of the following qualifying events:

- The end of employment or reduction of hours of employment;
- Death of the employee; or,
- The employee's becoming entitled to Medicare benefits (under Part A, Part B, or both).

For all other qualifying events (divorce or legal separation of the employee and spouse or a dependent child's losing eligibility for coverage as a dependent child), you must notify the Plan Administrator within 60 days after the qualifying event occurs. You must provide this notice either electronically through ESS (on-line employee self-serve) or email notice to: Yvonne Smith, HR; Supporting documentation showing the date of the event; the names and relationship of those who are affected; and, in the case of loss of other coverage, the plan type previously enrolled in (ex: medical, dental, vision), must be forwarded to Yvonne Smith, Benefits Coordinator, HR.

How is COBRA continuation coverage provided?

Once the Plan Administrator receives notice that a qualifying event has occurred, COBRA continuation coverage will be offered to each of the qualified beneficiaries. Each qualified beneficiary will have an independent right to elect COBRA continuation coverage. Covered employees may elect COBRA continuation coverage on behalf of their spouses, and parents may elect COBRA continuation coverage on behalf of their children.

COBRA continuation coverage is a temporary continuation of coverage that generally lasts for 18 months due to employment termination or reduction of hours of work. Certain qualifying events, or a second qualifying event during the initial period of coverage, may permit a beneficiary to receive a maximum of 36 months of coverage.

There are also ways in which this 18-month period of COBRA continuation coverage can be extended:

Disability extension of 18-month period of COBRA continuation coverage

If you or anyone in your family covered under the Plan is determined by Social Security to be disabled and you notify the Plan Administrator in a timely fashion, you and your entire family may be entitled to get up to an additional 11 months of COBRA continuation coverage, for a maximum of 29 months. The disability would have to have started at some time before the 60th day of COBRA continuation coverage and must last at least until the end of the 18-month period of COBRA continuation coverage. Notification of the event must be forwarded to Clermont County.

Second qualifying event extension of 18-month period of continuation coverage

If your family experiences another qualifying event during the 18 months of COBRA continuation coverage, the spouse and dependent children in your family can get up to 18 additional months of COBRA continuation coverage, for a maximum of 36 months, if the Plan is properly notified about the second qualifying event. This extension may be available to the spouse and any dependent children getting COBRA continuation coverage if the employee or former employee dies; becomes entitled to Medicare benefits (under Part A, Part B, or both); gets divorced or legally separated; or if the dependent child stops being eligible under the Plan as a dependent child. This extension is only available if the second qualifying event would have caused the spouse or dependent child to lose coverage under the Plan had the first qualifying event not occurred.

Are there other coverage options besides COBRA Continuation Coverage?

Yes. Instead of enrolling in COBRA continuation coverage, there may be other coverage options for you and your family through the Health Insurance Marketplace, Medicaid, or other group health plan coverage options (such as a spouse's plan) through what is called a "special enrollment period." Some of these options may cost less than COBRA continuation coverage. You can learn more about many of these options at www.healthcare.gov.

If you have questions

Questions concerning your Plan or your COBRA continuation coverage rights should be addressed to the contact or contacts identified below. For more information about your rights under the Employee Retirement Income Security Act (ERISA), including COBRA, the Patient Protection and Affordable Care Act, and other laws affecting group health plans, contact the nearest Regional or District Office of the U.S. Department of Labor's Employee Benefits Security Administration (EBSA) in your area or visit www.dol.gov/ebsa. (Addresses and phone numbers of Regional and District EBSA Offices are available through EBSA's website.) For more information about the Marketplace, visit www.HealthCare.gov.

Keep your Plan informed of address changes

To protect your family's rights, let the Plan Administrator know about any changes in the addresses of family members. You should also keep a copy, for your records, of any notices you send to the Plan Administrator.

Plan contact information

Yvonne Smith, Benefits Coordinator
Phone: 513-732-7981

101 E. Main Street, 3rd Floor Batavia, OH 45103
Email: ysmith@clermontcountyohio.gov

MEDICAID AND THE CHILDRENS’ HEALTH INSURANCE PROGRAM (CHIP) OFFER FREE OR LOW-COST HEALTH COVERAGE TO CHILDREN AND FAMILIES

Premium Assistance Under Medicaid and the Children’s Health Insurance Program (CHIP)

If you or your children are eligible for Medicaid or CHIP and you’re eligible for health coverage from your employer, your state may have a premium assistance program that can help pay for coverage, using funds from their Medicaid or CHIP programs. If you or your children aren’t eligible for Medicaid or CHIP, you won’t be eligible for these premium assistance programs but you may be able to buy individual insurance coverage through the Health Insurance Marketplace. For more information, visit www.healthcare.gov.

If you or your dependents are already enrolled in Medicaid or CHIP and you live in a State listed below, contact your State Medicaid or CHIP office to find out if premium assistance is available.

If you or your dependents are NOT currently enrolled in Medicaid or CHIP, and you think you or any of your dependents might be eligible for either of these programs, contact your State Medicaid or CHIP office or dial **1-877-KIDS NOW** or www.insurekidsnow.gov to find out how to apply. If you qualify, ask your state if it has a program that might help you pay the premiums for an employer-sponsored plan.

If you or your dependents are eligible for premium assistance under Medicaid or CHIP, as well as eligible under your employer plan, your employer must allow you to enroll in your employer plan if you aren’t already enrolled. This is called a “special enrollment” opportunity, and **you must request coverage within 60 days of being determined eligible for premium assistance**. If you have questions about enrolling in your employer plan, contact the Department of Labor at www.askebsa.dol.gov or call 1-866-444-EBSA (3272).

If you live in one of the following states, you may be eligible for assistance paying your employer health plan premiums. The following list of states is current as of January 31, 2014. Contact your State for more information on eligibility –

ALABAMA – Medicaid	COLORADO – Medicaid
Website: http://www.medicaid.alabama.gov Phone: 1-855-692-5447	Medicaid Website: http://www.colorado.gov/ Medicaid Phone (In state): 1-800-866-3513 Medicaid Phone (Out of state): 1-800-221-3943
ALASKA – Medicaid	
Website: http://health.hss.state.ak.us/dpa/programs/medicaid/ Phone (Outside of Anchorage): 1-888-318-8890 Phone (Anchorage): 907-269-6529	
ARIZONA – CHIP	FLORIDA – Medicaid

Website: http://www.azahcccs.gov/applicants Phone (Outside of Maricopa County): 1-877-764-5437 Phone (Maricopa County): 602-417-5437	Website: https://www.flmedicaidtprecovery.com/ Phone: 1-877-357-3268
	GEORGIA – Medicaid
	Website: http://dch.georgia.gov/ - Click on Programs, then Medicaid, then Health Insurance Premium Payment (HIPP) Phone: 1-800-869-1150
IDAHO – Medicaid	MONTANA – Medicaid
Medicaid Website: http://healthandwelfare.idaho.gov/Medical/Medicaid/PremiumAssistance/tabid/1510/Default.aspx Medicaid Phone: 1-800-926-2588	Website: http://medicaidprovider.hhs.mt.gov/clientpages/clientindex.shtml Phone: 1-800-694-3084
INDIANA – Medicaid	NEBRASKA – Medicaid
Website: http://www.in.gov/fssa Phone: 1-800-889-9949	Website: www.ACCESSNebraska.ne.gov Phone: 1-800-383-4278
IOWA – Medicaid	NEVADA – Medicaid
Website: www.dhs.state.ia.us/hipp/ Phone: 1-888-346-9562	Medicaid Website: http://dwss.nv.gov/ Medicaid Phone: 1-800-992-0900
KANSAS – Medicaid	
Website: http://www.kdheks.gov/hcf/ Phone: 1-800-792-4884	
KENTUCKY – Medicaid	NEW HAMPSHIRE – Medicaid
Website: http://chfs.ky.gov/dms/default.htm Phone: 1-800-635-2570	Website: http://www.dhhs.nh.gov/oii/documents/hippapp.pdf Phone: 603-271-5218
LOUISIANA – Medicaid	NEW JERSEY – Medicaid and CHIP
Website: http://www.lahipp.dhh.louisiana.gov Phone: 1-888-695-2447	Medicaid Website: http://www.state.nj.us/humanservices/dmahs/clients/medicaid/ Medicaid Phone: 609-631-2392 CHIP Website: http://www.njfamilycare.org/index.html CHIP Phone: 1-800-701-0710
MAINE – Medicaid	
Website: http://www.maine.gov/dhhs/ofi/public-assistance/index.html Phone: 1-800-977-6740 TTY 1-800-977-6741	
MASSACHUSETTS – Medicaid and CHIP	NEW YORK – Medicaid
Website: http://www.mass.gov/MassHealth Phone: 1-800-462-1120	Website: http://www.nyhealth.gov/health_care/medicaid/ Phone: 1-800-541-2831
MINNESOTA – Medicaid	NORTH CAROLINA – Medicaid

Website: http://www.dhs.state.mn.us/ Click on Health Care, then Medical Assistance Phone: 1-800-657-3629	Website: http://www.ncdhhs.gov/dma Phone: 919-855-4100
MISSOURI – Medicaid	NORTH DAKOTA – Medicaid
Website: http://www.dss.mo.gov/mhd/participants/pages/hipp.htm Phone: 573-751-2005	Website: http://www.nd.gov/dhs/services/medicalserv/medicaid/ Phone: 1-800-755-2604
OKLAHOMA – Medicaid and CHIP	UTAH – Medicaid and CHIP
Website: http://www.insureoklahoma.org Phone: 1-888-365-3742	Website: http://health.utah.gov/upp Phone: 1-866-435-7414
OREGON – Medicaid	VERMONT – Medicaid
Website: http://www.oregonhealthykids.gov http://www.hijossaludablesoregon.gov Phone: 1-800-699-9075	Website: http://www.greenmountaincare.org/ Phone: 1-800-250-8427
PENNSYLVANIA – Medicaid	VIRGINIA – Medicaid and CHIP
Website: http://www.dpw.state.pa.us/hipp Phone: 1-800-692-7462	Medicaid Website: http://www.dmas.virginia.gov/rcp-HIPP.htm Medicaid Phone: 1-800-432-5924 CHIP Website: http://www.famis.org/ CHIP Phone: 1-866-873-2647
RHODE ISLAND – Medicaid	WASHINGTON – Medicaid
Website: www.ohhs.ri.gov Phone: 401-462-5300	Website: http://www.hca.wa.gov/medicaid/premiumpymt/pages/index.aspx Phone: 1-800-562-3022 ext. 15473
SOUTH CAROLINA – Medicaid	WEST VIRGINIA – Medicaid
Website: http://www.scdhhs.gov Phone: 1-888-549-0820	Website: www.dhhr.wv.gov/bms/ Phone: 1-877-598-5820, HMS Third Party Liability
SOUTH DAKOTA - Medicaid	WISCONSIN – Medicaid
Website: http://dss.sd.gov Phone: 1-888-828-0059	Website: http://www.badgercareplus.org/pubs/p-10095.htm Phone: 1-800-362-3002
TEXAS – Medicaid	WYOMING – Medicaid
Website: https://www.gethipptexas.com/ Phone: 1-800-440-0493	Website: http://health.wyo.gov/healthcarefin/equalitycare Phone: 307-777-7531

To see if any other states have added a premium assistance program since January 31, 2014, or for more information on special enrollment rights, contact either:

U.S. Department of Labor
Employee Benefits Security Administration
www.dol.gov/ebsa
1-866-444-EBSA (3272)

U.S. Department of Health and Human Services
Centers for Medicare & Medicaid Services
www.cms.hhs.gov
1-877-267-2323, Menu Option 4, Ext. 61565

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

Effective: September 23, 2013

The Health Insurance Portability and Accountability Act of 1996 (HIPAA) requires the Clermont County, including each of its component health plans, (collectively the “Plan”) to provide you with this notice (“Notice”) that explains our privacy practices and outlines your rights under the Plan. This Notice does not change, diminish or limit your coverage in any way.

The terms of this Notice apply to the Plan. The information provided in this Notice applies to all persons, including all of your covered dependents.

Our Privacy Pledge

We understand that medical information about you and your health is personal. We are committed to protecting medical information about you. Additionally, we are required by law to maintain the privacy of our members’ protected health information (PHI) and provide you with certain rights with respect to your PHI.

Generally, PHI is individually identifiable health information, including demographic information, collected from you or created or received by a health care provider, health care clearinghouse, health plan, or your employer on behalf of a health plan, that relates to: (i) your past, present or future physical or mental health or condition; (ii) the provision of health care to you; or (iii) the past, present or future payment for the provision of health care to you. This Notice applies to all of the PHI we receive about you and your applicable dependents, whether made by hospital personnel, your personal doctor, other practitioners involved in your care, our third-party claims administrator, stop-loss carrier or network providers. When contracted claims administrators and other third parties’ services involve the use of your PHI, they will be required to perform their duties in a manner consistent with this Notice. Your personal doctor may have different policies or notices regarding his/her use and disclosure of your medical information created in his/her office or clinic.

We share PHI only as necessary to carry out treatment, payment and healthcare operations for the products and services you request and as permitted by law. We will not use or disclose your PHI for employment related actions and decisions or in connection with any non-health benefits or another employee benefit plan we sponsor. We will ensure your PHI received by our Human Resources Department is not disclosed to other employees of the company in violation of this Notice. We will destroy your PHI or continue to maintain privacy of it when the law requires its retention.

We reserve the right to change the terms of this Notice (even retroactively) and to make new provisions regarding your PHI that we maintain, as allowed or required by law. If our privacy practices change, we will send you a revised Notice if you are still a member of the Plan. Additionally, you may request a copy of this notice at any time by mailing a request to the Privacy Officer at the address at the end of this Notice.

Uses and Disclosures of Your Personal Health Information

We (independently or via a third party) will not use or disclose your PHI except in the following circumstances:

Your Authorization: We may use or disclose your PHI if you have signed a form authorizing the use or disclosure and then only in accordance with such authorization. You have the right to revoke the authorization in writing at any time. Your revocation will not affect any use or disclosure made pursuant to your authorization while it was in effect.

Personal Representatives: We will disclose your PHI to individuals authorized by you, or to an individual designated as your personal representative, attorney-in-fact, etc., so long as you provide us with a written notice/authorization and any supporting documents (e.g., power of attorney or a court order of appointment of the person as your guardian).

Spouses and Dependents: With only limited exceptions, we will send all mail to the employee. This includes mail relating to the employee's spouse and other family members who are covered under the Plan. If a person covered under the Plan has requested restrictions or confidential communications (see below), and if we have agreed to the request, we will send mail as provided in the request.

Disclosures for Treatment: We may make disclosures of your PHI as necessary for your treatment. For example, a doctor involved in your care may request your PHI that we hold to supplement his/her own records.

Uses and Disclosures for Payment: We may use and disclose your PHI as necessary for payment purposes. For example, we may use information regarding your medical procedures and treatment to process and pay claims. The Plan will mail Explanation of Benefits forms and other information to you at the address on record.

Uses and Disclosures for Health Care Operations: We may use and disclose your PHI, as necessary and as permitted by law for our health care operations which may include utilization review and management, underwriting, enrollment, auditing and other functions related to your Plan. For example, we may use information about your claims to refer you to a disease management program, project future benefit costs or audit the accuracy of the claims processing functions. However, we will not use your genetic information for underwriting purposes.

Disclosures to Family and Friends Involved in Your Care: We may disclose to designated family, friends, or others your PHI directly relevant to such person's involvement with your care or payment for your care. For example, if a family member or a caregiver calls the Plan with prior knowledge of a claim, the Plan may confirm whether or not the claim has been received and paid. You may instruct us, in writing, to stop or limit this kind of disclosure.

Outside Business Associates: Certain aspects of our services are performed through contracts with outside persons or organizations, such as auditing and legal services. At times it may be necessary for us to provide portions of your PHI to one or more of these outside persons or organizations who assist us with health care operations. In all cases, we require these business associates to safeguard the privacy of your information.

Other Health-Related Products or Services: We may use your PHI to determine whether you might be interested in, or benefit from, treatment alternatives or other health-related programs, products, or services which may be available to you under your plan. For example, we may use or disclose PHI to send you treatment reminders for services such as mammograms or prostate cancer screenings. We will not use your information to communicate with you about products or services which are not health-related without your written permission.

Other Uses and Disclosures: We are permitted by law to make certain uses and disclosures of your PHI without your authorization.

We may release your PHI for any of the following purposes:

- **Required by Law:** We will disclose your PHI when required to do so by federal, state or local law.
- **Plan Sponsor:** For purposes of maintaining the Plan, we may disclose your PHI to certain employees of the company. However, those employees will only use or disclose that information as necessary to perform plan administration functions or as otherwise required by HIPAA, unless you have authorized further disclosures.
- **Health Oversight Activities:** We may disclose your PHI to a government agency authorized to oversee the health care system or government programs, or its contractors (e.g., state insurance department, U.S. Department of Labor) for activities authorized by law, such as audits, examinations, investigations, inspections and licensure activities.
- **Legal Proceedings:** We may disclose your PHI in response to a court or administrative order, subpoena, discovery request or other lawful process, under certain circumstances.
- **Law Enforcement:** We may disclose your PHI to law enforcement officials under limited circumstances. For example, in response to a warrant or subpoena; for the purpose of identifying or locating a suspect, witness, or missing person; or to provide information concerning victims of crimes.
- **For Public Health Activities:** We may disclose your PHI to a government agency that oversees the health care system or government programs for activities such as, but not limited to, preventing or controlling disease or activities related to the quality, safety or effectiveness of an FDA-regulated product or activity.
- **Workers' Compensation:** We may disclose your PHI when authorized by and to the extent necessary to comply with workers' compensation laws and similar programs.
- **Victims of Abuse, Neglect, or Domestic Violence:** We may disclose your PHI to appropriate authorities if we reasonably believe you are a possible victim of abuse, neglect, domestic violence or other crimes.

- **Coroners, Medical Examiners, Funeral Directors, and Organ Donation:** In certain instances, we may disclose your PHI to coroners, medical examiners or funeral directors and in connection with organ donation or transplantation.
- **Research:** We may disclose your PHI to researchers, if certain established steps are taken to protect your privacy.
- **Threat to Health or Safety:** We may disclose your PHI to the extent necessary to prevent or lessen a serious and imminent threat to your health or safety, or the health or safety of others.
- **For Specialized Government Functions:** We may disclose your PHI in certain circumstances or situations to a correctional institution if you are an inmate in a correctional facility, to an authorized federal official when it is required for lawful intelligence or other national security activities or to an authorized authority of the Armed Forces.

Minimum Necessary Standard

When using or disclosing PHI or when requesting PHI from another covered entity, we will make reasonable efforts not to use, disclose or request more than the minimum amount of information necessary to accomplish the intended purpose of the use, disclosure or request, taking into consideration practical and technological limitations.

However, the minimum necessary standard will not apply in the following situations:

- disclosures to or requests by a health care provider for treatment
- uses or disclosures made to the individual
- disclosures made to the Secretary of the US Department of Health & Human Services
- uses or disclosures that are required by law
- uses or disclosures that are required for the Plan's compliance with the HIPAA Privacy Standards
- uses or disclosures made pursuant to an authorization

This Notice does not apply to information that has been de-identified. De-identified information is health information that does not identify an individual, and with respect to which there is no reasonable basis to believe that the information can be used to identify an individual.

In addition, we may use or disclose "summary health information" for obtaining premium bids or modifying, amending or terminating the Plan. Summary health information summarizes the claims history, claims expenses or type of claims experienced by individuals for whom we have provided health benefits under the Plan, and from which identifying information has been deleted in accordance with the HIPAA Privacy Standards.

Your Rights

Access to Your PHI: You have the right to copy and inspect the PHI we retain on your behalf. All requests for access must be in writing and be signed by you or your representative. If the information you request is maintained electronically, and you request an electronic copy, we will provide a copy in the electronic form and format you request, if the information can be readily produced in that form and format. If the information cannot be readily produced, we will work with you to come to an agreement on form and format and if one can't be reached, we will provide a paper copy. We reserve the right to charge you a reasonable copying fee if you request a paper copy of the information. We also reserve the right to charge for postage if you request a mailed copy.

Amendments to Your PHI: You have the right to request, in writing, PHI we maintain about you be amended. We are not obligated to make all requested amendments, but we will give each request careful consideration. All amendment requests, in order to be considered by us, must be in writing, signed by you or your representative, and must state the reasons for the amendment request. If an amendment you request is made by us, we may also notify others who work with us. You may request an amendment by sending a written request to the address listed at the end of this notice.

Confidential communications: You have the right to request confidential communications. If you believe that normal communications would put you in danger (as in situations of domestic violence), you may request that the Plan send communications with PHI (e.g., an Explanation of Benefits) to you by alternative means or to an alternative location. Your request must be in writing. Such requests, if reasonable, will be accommodated when you state in the request that you believe normal communications would endanger you.

Restrictions on Uses and Disclosures of Your PHI: You may request, in writing, we restrict uses and disclosures of your PHI to carry out treatment, payment or health care operations, or to restrict disclosures to family members, relatives, friends or other persons identified by you who are involved in your care or payment for your care. However, we are not required to agree to your requested restriction but we will attempt to accommodate reasonable requests when appropriate, and we retain the right to terminate an agreed-to restriction if we believe such termination is appropriate. In the event of a termination by us, we will notify you of such termination. You also have the right to terminate any agreed-to restriction by sending a written request to the address listed at the end of this notice.

Accounting for Disclosures of Your PHI: You have the right to receive an accounting of certain disclosures of your PHI. Requests must be made in writing, signed by you or your representative, and sent to the address listed at the end of this notice. The first accounting of a 12-month period is free; we reserve the right to charge a fee for each subsequent accounting you request within the same 12-month period.

Breach Notification: You have the right to be notified in the event that we or a Business Associate discover a breach of your unsecured PHI.

Copy of this Notice: You have the right to a paper copy of this Notice upon request. Your request must be in writing and sent to the Privacy Officer. A copy of the current notice will be sent to you.

Complaints

If you believe your rights have been violated, you can file a complaint, in writing, to the address listed at the end of this Notice. The Privacy Officer will investigate and address any issues of noncompliance with this Notice. You may also file a complaint with the Secretary of the U.S. Department of Health and Human Services Office for Civil Rights, by writing to 200 Independence Avenue, S.W., Washington, D.C. 20201, calling 1-877-696-6775, or visiting www.hhs.gov/ocr/privacy/hipaa/complaints. We will not retaliate against you for filing a complaint.

For Further Information

If you have any questions regarding this Notice or the subjects addressed in it, you may contact the following individual:

Yvonne Smith, Benefits Coordinator
101 E. Main Street, 3rd Floor
Batavia, OH 45103

Phone: 513-732-7981

Fax: 513-732-1921

Email: ysmith@clermontcountyohio.gov

This Notice attempts to summarize the HIPAA Privacy Standards. The Privacy Standards will supersede any discrepancy between the information in this Notice and the Privacy Standards.