



The privacy provisions of the federal law, the **Health Insurance Portability and Accountability Act of 1996 (HIPAA)**, establish standards to protect the confidentiality of a person's protected health information (PHI). The privacy rule applies to everyone, not just human resource and benefits administration.

Pinellas County Schools is committed to protecting the privacy of members' health information and complying with applicable federal and state laws that protect the privacy and security of members' health information. The Superintendent or designee will serve as Pinellas County Schools Privacy Officer. The Superintendent or designee will develop procedures to protect certain confidential health information known as protected health information or PHI. An employee's PHI will not be used or disclosed without a written authorization from the employee, except as permitted by federal and state information privacy laws. For employee benefits, the Privacy Officer is listed below.

Our Privacy Pledge

Our privacy policy and practices will protect certain confidential health information known as "protected health information" (PHI). An employee's PHI will not be used or disclosed without written authorization from the employee, except as permitted by federal and state health information privacy laws.

What does the HIPAA Privacy Rule protect?

The HIPAA Privacy Rule protects the privacy of health information obtained or created by covered entities (e.g. health plans, health plan providers, and health care administrators). In addition, the HIPAA Privacy Rule was designed to prevent health information from being used against employees by their employers for employment-related purposes.

What Is Protected Health Information (PHI)?

Protected health information (PHI) is any information that describes the past, present or future physical or mental health or the condition of an employee, the provision of health care to an individual or the payment of a past, present or future health care claim. This information can take any form – written on paper, displayed or stored in a computer, or spoken in conversation.

Which benefit plans are covered by the HIPAA Privacy Rule?

The HIPAA Privacy Rule covers the following benefits plans: Medical plans, (including prescription drug plans and mental health plans) Dental Plans, Vision Plan, Health Care Reimbursement Account (HCRA) and Employee Assistance Program (EAP).

What Is PHI?

PHI is health information that can identify a person and shows:

- Date of birth
- Gender
- Medical records number
- Health plan numbers
- Address, ZIP code
- Phone number, e-mail address, fax number, IP address
- License numbers
- Full face photographic images
- Social Security number

When is individual authorization required for disclosure of health information?

Covered Entities must obtain an individual's authorization to use or disclose that person's protected health information for non-routine purposes, such as for employment decisions and eligibility or enrollment determinations, or other non-health purposes. Individual authorization is *not* required for routine use or disclosure. This allows health plans, health care clearinghouses and health care providers to use and disclose health information for routine health care treatment, payment or health plan operations without first obtaining a patient's authorization.

Under HIPAA, an authorization is an individual's permission for a Covered Entity to use PHI for specified purposes, other than for payment, treatment or operations, or to disclose PHI to a third party.

When does the Privacy Rule *not* apply? When can I disclose PHI?

The HIPAA Privacy Rule covers our day-to-day processes and procedures, departmental operations and information technology methods. Specifically, we must:

- Ensure that the insurance carriers or PCS provide a notice to new employees and participants of the covered health plans that describes their privacy rights and how PHI may be used or disclosed.
- Ensure compliance with HIPAA policies and procedures to safeguard the PHI we maintain or are able to access.
- Inform employees who have questions about the HIPAA policies or procedures to contact the Employee Benefits Privacy Officer who is responsible for ensuring the Privacy Rule is followed.
- Train new employees on the HIPAA policies and procedures and their PHI rights.
- Ensure that our plans are compliant, and that we have obtained assurances from our business associates that they have compliant policies and procedures in place regarding the PHI of our employees and plan participants.
- Review the collection, storage and use of PHI within our day-to-day operations.
- Monitor safeguards to protect the privacy of PHI. Potential safeguards include:
 - Administrative safeguards, such as procedures for the monitoring of our internal flow of PHI and enforcement of complaint and discipline policies;
 - Technical safeguards, such as computer firewalls; and
 - Physical safeguards, such as locking doors and filing cabinets and restricting access to spaces where PHI is stored.

Who can I contact for additional information?	
Function	Contact Information
<p>Employee Benefits Privacy Officer</p> <ul style="list-style-type: none"> ▪ Implements and oversees HIPAA privacy policies and procedures, including all activities related to the development, implementation, maintenance of and adherence to safeguarding PHI ▪ Ensures compliance with HIPAA and all other federal & state rules and regulations pertaining to use and release of PHI ▪ Acts as internal resource for questions about the HIPAA Privacy Rule, and for additional technical training for designated individuals 	<p><i>Employee Benefits Plans Only:</i> April Paul Director Risk Management and Insurance 301 4th Street S.W. Largo, FL 33770 (727) 588-6136</p>

This notice provides an overview of the HIPAA Privacy Rule and broadly describes how this regulation will affect how PCS handles employee health information from our health care plans. This information is not intended to provide all of the details of the HIPAA Privacy Rule or of PCS' policies and procedures. If there is any discrepancy between the provisions of the HIPAA Privacy Rule and this notice the HIPAA Privacy Rule will govern.