

COMPLIANCE AND RISK MANAGEMENT

Health Insurance Portability and Accountability Act of 1996 (HIPAA) – Privacy and Security

The Trustees intend this policy to provide guidelines to protect the privacy of participants and beneficiaries participating in the Everett School Employee Benefit Trust (“Trust”), and to ensure that all information related to participants and beneficiaries is maintained in the strictest confidence and in accordance with the Health Insurance Portability and Accountability Act of 1996 (“HIPAA”) and its implementing privacy regulations (the “Privacy Rule”) and security regulations (the “Security Rule”). Under the Privacy Rule, the Trust’s policy restricts the Group Health Plan’s use and disclosure of protected health information, or “PHI.” Under the Security Rule, this policy ensures the confidentiality, integrity and availability of electronic PHI, or “ePHI,” and protects against any reasonably anticipated threats or hazards to the security or integrity of ePHI.

Details of the policy and implementing procedures may be found in the Trust’s HIPAA Privacy Manual.

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| Cross References: | HIPAA Privacy Manual (as amended for Security) | |
| | Board Policy 3245 | Students: Technology Policy |
| | Board Procedure 3245P | Students: Technology Procedure |
| | Board Policy 5225 | Human Resources: Technology Policy |
| | Board Procedure 5225P | Human Resources: Technology Procedure |

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