

OPERATIONAL SERVICES

4:102 HIPPA Privacy and Disclosure

Gurnee School District 56 ["the District"] sponsors a group health plan (the Plan). Members of the District may have access to the individually identifiable health information of Plan participants (1) on behalf of the Plan itself or (2) on behalf of the District for administrative functions of the Plan.

The Health Insurance Portability and Accountability Act of 1996 (HIPAA) and its implementing regulations restrict the District's ability to use and disclose protected health information (PHI).

Protected Health Information. Protected health information means information that is created or received by the Plan and relates to the past, present, or future physical or mental health or condition of a participant; the provision of health care to a participant; or the past, present, or future payment for the provision of health care to a participant; and that identifies the participant or for which there is a reasonable basis to believe the information can be used to identify the participant. Protected health information includes information of persons living or deceased.

It is the District's policy to comply fully with HIPAA's requirements. The District may only disclose PHI when the disclosure is related to treatment, payment, health care operations, or upon authorization from the health plan participant. To that end, all members of the District's workforce who have access to PHI must comply with this Privacy Policy. For purposes of this Policy, the District's workforce includes individuals who would be considered part of the workforce under HIPAA such as employees, volunteers, trainees, and other persons whose work performance is under the direct control of the District or its members, whether or not they are paid by the District or its members. The term "employee" includes all of these types of workers.

No third party rights (including but not limited to rights of Plan participants, beneficiaries, covered dependents, or business associates) are intended to be created by this Policy. The District reserves the right to amend or change this Policy at any time (and even retroactively) without notice. This Policy does not address requirements under other federal laws or under State laws.

Adopted: November 16, 2022