

NOTICE OF PRIVACY PRACTICES

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

Effective Date of Notice: April 14, 2003

Name of Plan: ADVANTAGE HEALTH PLANS TRUST GROUP BENEFIT PLAN ("PLAN")
Name of Sponsor: Each employer that has adopted the Plan for the benefit of its employees. ("Sponsor")
HIPAA Privacy Compliance Coordinator: Vice President of Operations
The Kempton Company
13431 N Broadway, Suite 130, Oklahoma City, OK 73114

This Notice ("Notice") is made to comply with the Standards for Privacy of Individually Identifiable Health Information ("Privacy Standards") set forth by the U.S. Department of Health and Human Services ("HHS") pursuant to the Health Insurance Portability and Accountability Act of 1996, as amended ("HIPAA"). The Plan is required by law to take reasonable steps to ensure the privacy of your Protected Health Information, as the term is defined below, and to inform you about:

- ▶ the Plan's uses and disclosures of PHI;
- ▶ your privacy rights with respect to your PHI;
- ▶ the Plan's duties with respect to your PHI;
- ▶ your right to file a complaint with the Plan and with the Secretary of HHS; and
- ▶ the person or office to contact for further information about the Plan's privacy practices.

The following terms will help you understand this Notice.

"Protected Health Information" ("PHI") includes all "Individually Identifiable Health Information" transmitted or maintained by the Plan, regardless of form (oral, written or electronic).

"Individually Identifiable Health Information" means health information that:

- Is created or received by a health care provider, health plan, employer or health care clearinghouse;
- Relates to the past, present or future physical or mental health or condition of an individual; the provision of health care to an individual; or the past, present or future payment for the provision of health care to an individual; and
- Identifies the individual, or with respect to which there is a reasonable basis to believe the information can be used to identify the individual.

NOTE: PHI *excludes* individually identifiable health information in: i) Education records covered by the Family Educational Rights and Privacy Act, as amended, 20 U.S.C. 1232g; ii) Records described at 20 U.S.C. 1232g(a)(4)(B)(iv); and(iii) Employment records held by a covered entity in its role as employer.

SECTION 1. NOTICE OF PHI USES AND DISCLOSURES

A. *Required PHI Uses and Disclosures.*

Upon your request, the Plan is required to give you access to certain PHI in order to inspect and copy it. Use and disclosure of your PHI may be required by the Secretary of the Department of Health and Human Services to investigate or determine the Plan's compliance with the privacy regulations.

B. *Permitted Uses and Disclosures to Carry Out Treatment, Payment and Health Care Operations.*

The Plan, its business associates, and their agents/subcontractors, if any, will use or disclose PHI without your consent, authorization or opportunity to agree or object to carry out treatment, payment and health care operations. The Plan will disclose PHI to a business associate only if the Plan receives satisfactory assurance that the business associate will appropriately safeguard the information.

In addition, the Plan may contact you to provide information about treatment alternatives or other health-related benefits and services that may be of interest to you. The Plan will disclose PHI to the Sponsor for purposes related to treatment, payment and health care operations. The Sponsor has amended its plan documents to protect your PHI as required by the Privacy Standards. The Sponsor will obtain an authorization from you if it intends to use or disclose your PHI for purposes unrelated to treatment, payment and health care operations. These definitions will help you understand the Notice.

“Treatment” is the provision, coordination or management of health care and related services by one or more health care providers. It also includes, but is not limited to, consultations and referrals between one or more of your providers. For example, the Plan may disclose the name of your treating dentist to your treating orthodontist so that he may ask for your dental X-rays from the treating dentist.

“Payment” means activities undertaken by the Plan: (i) to obtain premiums or payments; (ii) to determine or fulfill its responsibility for coverage and provision of benefits under the Plan; or (iii) to obtain or provide reimbursement for the provision of health care. Payment includes, but is not limited to, actions to determine eligibility or coverage, billing, claims management, collection activities, subrogation, reviews for medical necessity and appropriateness of care, utilization review and pre-authorizations. For example, the Plan may tell a doctor whether you are eligible for coverage or what percentage of the bill might be paid by the Plan.

“Health care operations” include, but are not limited to, conducting quality assessment and improvement activities, contacting health care providers and patients with information about treatment alternatives, reviewing the competence or qualifications of health care professionals, evaluating health plan performance, underwriting, premium rating and other insurance activities related to creating, renewing or replacing health insurance contracts or health benefits and ceding, securing, or placing a contract for reinsurance or risk relating to claims for health care such as stop loss insurance or re-insurance. It also includes disease management, case management, conducting or arranging for medical review, legal services and auditing functions including fraud and abuse detection and compliance programs, business planning and development, business management and general administrative activities. For example, the Plan may use information about your claims to refer you to a disease management program, project future benefit costs or audit the accuracy of its claims processing functions.

C. *Uses And Disclosures That Require Your Written Authorization.*

Your written authorization generally will be obtained before the Plan will use or disclose psychotherapy notes about you from your psychotherapist. Psychotherapy notes are separately filed notes about your conversations with your mental health professional during a counseling session. They do not include summary information about your mental health treatment. The Plan may use and disclose such notes without authorization when needed by the Plan to defend itself in a litigation you file.

D. *Uses and Disclosures That Require That You Be Given An Opportunity to Agree or Disagree Prior to the Use or Release*

The Plan may disclose to a family member, other relative, close personal friend of yours, or any other person you have identified, any PHI which is directly relevant to such person’s involvement with your care or the payment for your health care if you have agreed, either orally or in writing, to the disclosure or have been given an opportunity to object and have not objected, or the Plan infers from the circumstances, based upon professional judgment, that you do not object to the disclosure.

However, if you are not present, or it is not possible to provide you an opportunity to agree or object to the disclosure because of your incapacity or an emergency circumstance, the Plan may, in the exercise of professional judgment, determine whether the disclosure is in your best interests, and, if so, disclose only PHI that is directly relevant to the person’s involvement with your health care.

E. *Uses and Disclosures For Which Authorization or Opportunity to Agree or Object Is Not Required.*

Your PHI may be used and disclosed without your authorization or opportunity to agree or object under the following circumstances:

1. When required by law, provided that the use or disclosure complies with and is limited to the relevant requirements of such law.
2. When permitted for purposes of public health activities, including disclosures to (a) a public health authority or other appropriate government authority authorized by law to receive reports of child abuse or neglect and (b) a person subject to the jurisdiction of the Food and Drug Administration (FDA) regarding an FDA-regulated product or activity for the purpose of activities related to the quality, safety or effectiveness of such FDA-regulated product or activity, including to report product defects, to permit product recalls and to conduct post-marketing surveillance. PHI also may be disclosed to a person who may have been exposed to a communicable disease or may otherwise be at risk of contracting or spreading a disease or condition, if authorized by law.
3. Except for reports of child abuse or neglect permitted by (2) above, when required or authorized by law, or with your agreement, the Plan may disclose PHI about you to a government authority, including a social service or protective services agency, if the Plan reasonably believes you to be a victim of abuse, neglect, or domestic violence. In such case, the Plan will promptly inform you that such a disclosure has been or will be made unless (a) the Plan believes that informing you would place you at risk of serious harm or (b) the Plan would be informing your personal representative, and the Plan believes that your personal representative is responsible for the abuse, neglect or other injury, and that informing such person would not be in your best interests. For the purposes of reporting child abuse or neglect, it is not necessary to inform the minor that such a disclosure has been or will be made. Disclosure generally may be made to the minor's parents or other representatives although there may be circumstances under federal or state law when the parents or other representatives may not be given access to the minor's PHI.
4. The Plan may disclose your PHI to a health oversight agency for oversight activities authorized by law. This includes civil, administrative or criminal investigations; inspections; licensure or disciplinary actions (for example, to investigate complaints against providers); and other activities necessary for appropriate oversight of: (a) the health care system, (b) government benefit programs for which health information is relevant to beneficiary eligibility, (c) entities subject to government regulatory programs for which health information is needed to determine compliance with the Sponsor's Notice of Privacy Practices program standards, or (d) entities subject to civil rights laws for which health information is needed to determine compliance.
5. The Plan may disclose your PHI when required for judicial or administrative proceedings. For example, your PHI may be disclosed in response to a subpoena or discovery request provided certain conditions are met. One of those conditions is that satisfactory assurances must be given to the Plan that the requesting party has made a good faith attempt to provide written notice to you, and the notice provided sufficient information about the proceeding to permit you to raise an objection, and no objections were raised or were resolved in favor of disclosure by the court or tribunal.
6. The Plan may disclose your PHI to a law enforcement official when required for law enforcement purposes, as for example to report certain types of wounds. The Plan may also disclose your PHI for the purpose of identifying or locating a suspect, fugitive, material witness or missing person. Under certain circumstances, the Plan may disclose your PHI in response to a law enforcement official's request if you are, or are suspected to be, a victim of a crime. Further, the Plan may disclose your PHI if it believes in good faith that the PHI constitutes evidence of criminal conduct that occurred on the Sponsor's or Plan's premises.
7. The Plan may disclose PHI to a coroner or medical examiner for the purpose of identifying a deceased person, determining a cause of death or other duties as authorized by law. Also, disclosure is permitted to funeral directors, consistent with applicable law, as necessary to carry out their duties with respect to the decedent.
8. The Plan may use or disclose PHI for research, subject to certain conditions.
9. When consistent with applicable law and standards of ethical conduct, the Plan may use or disclose PHI if the Plan, in good faith, believes the use or disclosure: (a) is necessary to prevent or lessen a serious and imminent threat to health or safety of a person or the public and the disclosure is made to a person(s) able to prevent or lessen the threat, including the target of the threat; or (b) is needed for law enforcement authorities to identify or apprehend an individual, provided certain requirements are met.
10. When authorized by and to the extent necessary to comply with workers' compensation or other similar programs established by law.

Except as otherwise indicated in this Notice, uses and disclosures will be made only with your written authorization, subject to your right to revoke such authorization. You may revoke an authorization at any time, provided your revocation is done in writing, except to the extent that the Plan has taken action in reliance upon the authorization, or if the authorization was obtained as a condition of obtaining coverage which allows the Plan the right to contest a claim under the Plan.

SECTION 2: RIGHTS OF INDIVIDUALS

A. *Right to Request Restrictions on PHI Uses and Disclosures.*

You may request the Plan to 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, the Plan is not required to agree to your requested restriction.

If the Plan agrees to a requested restriction, the Plan may not use or disclose PHI in violation of such restriction, except that, if you requested a restriction and later are in need of emergency treatment and the restricted PHI is needed to provide the emergency treatment, the Plan may use the restricted PHI, or it may disclose such information to a health care provider, to provide such treatment to you. If restricted PHI is disclosed to a health care provider for emergency treatment, the Plan must request that such health care provider not further use or disclose the information.

A restriction agreed to by the Plan is not effective to prevent uses or disclosures when required by the Secretary of Health and Human Services to investigate or determine the Plan's compliance with the Privacy Standards or uses or disclosures that are otherwise required by law.

The Plan may terminate its agreement to a restriction, if:

- You agree to or request the termination in writing;
- You orally agree to the termination and the oral agreement is documented; or
- The Plan informs you that it is terminating its agreement to a restriction, except that such termination is only effective with respect to PHI created or received after the Plan has informed you of the termination.

If the Plan agrees to a restriction, it will document the restriction by maintaining a written or electronic record of the restriction. The record of the restriction will be retained for six years from the date of its creation or the date when it last was in effect, whichever is later.

You or your personal representative will be required to request restrictions on uses and disclosures of your PHI in writing. Such requests should be addressed to the HIPAA Privacy Compliance Coordinator listed on page 1.

B. *Right to Request Confidential Communications of PHI*

You may request that the Plan provide you communications of PHI by alternative means or at alternative locations if you clearly state that the disclosure of all or part of the information to which the request pertains could endanger you. The Plan will accommodate all such reasonable requests if you provide the following:

- an explanation of the PHI that may endanger you;
- when appropriate, information as to how payment, if any, will be handled; and
- an alternative address or other method of contact that you want the Plan to use.

Such requests must be in writing sent to the HIPAA Privacy Compliance Coordinator listed on page 1.

C. *Right to Inspect and Copy PHI.*

You have a right to inspect and obtain a copy of your PHI contained in a "designated record set," for as long as the Plan maintains PHI in the designated record set.

"Designated Record Set" means a group of records maintained by or for a health plan that is enrollment, payment, claims adjudication and case or medical management record systems maintained by or for a health plan; or used in whole or in part by or for the health plan to make decisions about individuals. Information used for quality control or peer review analyses and not used to make decisions about individuals is not in the designated record set.

The Plan will act on a request for access no later than 30 days after receipt of the request. However, if the request for access is for PHI that is not maintained or accessible to the Plan on-site, the Plan must take action no later than 60 days from the receipt of such request.

The Plan must take action as follows: if the Plan grants the request, in whole or in part, the Plan must inform you of the acceptance and provide the access requested. However, if the Plan denies the request, in whole or in part, the Plan must provide you with a written denial. If the Plan cannot take action within the required time, the Plan may extend the time for such action by no more than 30 days if the Plan, within the applicable time limit, provides you with a written statement of the reasons for the delay and the date by which it will complete its action on the request.

If the Plan provides access to PHI, it will provide the access requested, including inspection or obtaining a copy, or both, of your PHI in a Designated Record Set. The Plan will provide you with access to the PHI in the form or format requested if it is readily producible in such form or format; or, if it is not, in a readable hard copy form or such other form or format as agreed to between you and the Plan. The Plan may provide you with a summary of the PHI requested, in lieu of providing access to the PHI or may provide an explanation of the PHI to which access has been provided in certain circumstances. The Plan will arrange with you for a convenient time and place to inspect or obtain a copy of the PHI, or mail a copy of the PHI at your request. If you request a copy of PHI or agree to a summary or explanation of PHI, the Plan may impose a reasonable, cost-based fee.

If the Plan denies access to PHI in whole or in part, the Plan will, to the extent possible, give you access to any other PHI requested, after excluding PHI as to which the Plan has grounds to deny access. If access is denied, you or your personal representative will be provided with a written denial setting forth the basis for the denial, if applicable, a statement of your review rights, including a description of how you may exercise those review rights and a description of how you may complain to the Plan or to the Secretary of the HHS. If you request review of a decision to deny access, the Plan will refer the request to a designated licensed health care professional for review. The reviewing official will determine, within a reasonable period of time, whether to deny the access requested. The Plan will promptly provide you with written notice of that determination.

If the Plan does not maintain the PHI that is the subject of your request for access, and the Plan knows where the requested information is maintained, the Plan will inform you where to direct the request for access. You or your personal representative will be required to request access to your PHI in writing. Such requests should be addressed to the HIPAA Privacy Compliance Coordinator listed on page 1.

D. *Right to Amend PHI*

You have the right to request the Plan to amend your PHI or a record about you in a Designated Record Set for as long as the PHI is maintained therein. The Plan may deny your request for amendment if it determines that the PHI or record that is the subject of the request:

- Was not created by the Plan, unless you provide a reasonable basis to believe that the originator of PHI is no longer available to act on the requested amendment;
- Is not part of the Designated Record Set;
- Would not be available for your inspection under the Privacy Standards; or
- Is accurate and complete.

The Plan has 60 days after the request is made to act on the request. A single 30-day extension is allowed if the Plan is unable to comply within that deadline provided that the Plan, within the original 60-day time period, gives you a written statement of the reasons for the delay and the date by which it will complete its action on the request. If the Plan accepts the requested amendment, the Plan will make the appropriate amendment to the PHI or record that is the subject of the request by, at a minimum, identifying the records in the designated record set that are affected by the amendment and appending or otherwise providing a link to the location of the amendment. The Plan will timely inform you that the amendment is accepted and obtain your identification of and agreement to have the Plan notify the relevant persons with which the amendment needs to be shared as provided in the Privacy Standards.

If the request is denied in whole or part, the Plan must provide you with a written denial that: (i) explains the basis for the denial; (ii) sets forth your right to submit a written statement disagreeing with the denial and how to file such a statement; (iii) states that, if you do not submit a statement of disagreement, you may request that the Plan provide your request for amendment and the denial with any future disclosures of the PHI that is the subject of the amendment; and (iv) includes a description of how you may complain to the Plan or to the Secretary of HHS. The Plan may reasonably limit the length of a statement of disagreement. Further, the Plan may prepare a written rebuttal to a statement of disagreement, which will be provided to you. The Plan must, as appropriate, identify the record or

PHI in the Designated Record Set that is the subject of the disputed amendment and append or otherwise link your request for an amendment, the Plan's denial of the request, your statement of disagreement, if any, and the Plan's rebuttal, if any, to the designated record set. If a statement of disagreement has been submitted, the Plan will include the above-referenced material, or, at the Plan's election, an accurate summary of such information, with any subsequent disclosure of the PHI to which the disagreement relates. If you do not submit a written statement of disagreement, the Plan must include your request for amendment and its denial, or an accurate summary of such information with any subsequent disclosure of the PHI only if requested by you.

You or your personal representative must request an amendment to your PHI in a Designated Record Set in writing addressed to the Privacy Compliance Coordinator listed on page 1. All requests for amendments of PHI must include a reason to support the requested amendment.

E. *Right to Receive an Accounting of PHI Disclosures.*

At your request, the Plan will provide you with an accounting of disclosures by the Plan of your PHI during the six years prior to the date on which the accounting is requested. However, such accounting need not include PHI disclosures made: (a) to carry out treatment, payment or health care operations; (b) to individuals about their own PHI; (c) incident to a use or disclosure otherwise permitted or required by the Privacy Standards; (d) pursuant to an authorization; (e) to certain persons involved in your care or payment for your care; (f) to notify certain persons of your location, general condition or death; (g) as part of a "Limited Data Set" (as defined in the Privacy Standards), which largely relates to research purposes; or (h) prior to the compliance date of April 14, 2003. You may request an accounting of disclosures for a period of time less than six years from the date of the request.

The accounting will include disclosures of PHI that occurred during the six years (or such shorter time period, if applicable) prior to the date of the request for an accounting, including disclosures to or by business associates of the Plan. Except as otherwise provided below, for each disclosure, the accounting will include:

- The date of the disclosure;
- The name of the entity or person who received the PHI and, if known, the address of such entity or person;
- A brief description of the PHI disclosed; and
- A brief statement of the purpose of the disclosure that reasonably informs you of the basis for the disclosure, or, in lieu of such statement, a copy of a written request for disclosure.

If during the period covered by the accounting, the Plan has made multiple disclosures of PHI to the same person or entity for a single purpose, the accounting may, with respect to such multiple disclosures, provide the above-referenced information for the first disclosure; the frequency, periodicity or number of the disclosures made during the accounting period; and the date of the last disclosure.

If during the period covered by the accounting, the Plan has made disclosures of PHI for a particular research purpose for 50 or more individuals, the accounting may, with respect to such disclosures for which your PHI may have been included, provide certain information as permitted by the Privacy Standards. If the Plan provides an accounting for such research disclosures, and if it is reasonably likely that your PHI was disclosed for such research activity, the Plan shall, at your request, assist in contacting the entity that sponsored the research and the researcher.

If the accounting cannot be provided within 60 days after receipt of the request, an additional 30 days is allowed if the individual is given a written statement of the reasons for the delay and the date by which the accounting will be provided. If you request more than one accounting within a 12-month period, the Plan will charge a reasonable, cost-based fee for each subsequent accounting unless you withdraw or modify the request for a subsequent accounting to avoid or reduce the fee.

You or your personal representative will be required to request an accounting of your PHI disclosures in writing. Such requests should be addressed to the HIPAA Privacy Compliance Coordinator listed on page 1.

F. *The Right To Receive a Paper Copy of This Notice Upon Request.*

If you have received this Notice through electronic means, you also have a right to obtain a paper copy of this Notice upon request. To request a paper copy of this Notice, contact the HIPAA Privacy Compliance Coordinator listed on page 1.

G. *A Note About Personal Representatives.*

You may exercise your rights through a personal representative. Your personal representative will be required to produce evidence of his/her authority to act on your behalf before that person will be given access to your PHI or allowed to take any action for you. Proof of such authority may include, but is not limited to, the following:

- a power of attorney for health care purposes, notarized by a notary public;
- a court order of appointment of the person as the conservator or guardian of the individual; or
- an individual who is the parent of a minor child.

The Plan retains discretion to deny access to your PHI to a personal representative to provide protection to those vulnerable people who depend on others to exercise their rights under these rules and who may be subject to abuse or neglect. This also applies to personal representatives of minors.

SECTION 3: THE PLAN'S DUTIES

A. *Notice.*

The Plan is required by law to maintain the privacy of PHI and to provide individuals (participants and beneficiaries) with notice of its legal duties and privacy practices with respect to PHI.

This Notice is effective beginning on the effective date set forth on Page 1 of this Notice, and the Plan is required to comply with the terms of this Notice. However, the Plan reserves the right to change the terms of this Notice and to make the new revised notice provisions effective for all PHI that it maintains, including any PHI created, received or maintained by the Plan prior to the date of the revised notice. If a privacy practice is changed, a revised version of this Notice will be provided to all individuals then covered by the Plan. If agreed upon between the Plan and you, the Plan will provide you with a revised Notice electronically. Otherwise, the Plan will mail a paper copy of the revised Notice to your home address. In addition, the revised Notice will be maintained on any web site maintained by or for the Plan to provide information about its benefits. Any revised version of this Notice will be distributed within 60 days of any material change to the uses or disclosures, the individual's rights, the duties of the Plan or other privacy practices stated in this Notice. Except when required by law, a material change to any term of this Notice may not be implemented prior to the effective date of the revised notice in which such material change is reflected.

B. *Minimum Necessary Standard*

When using or disclosing PHI or when requesting PHI from another covered entity, the Plan will make reasonable efforts not to use, disclose or request more than the minimum amount of PHI 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:

1. disclosures to or requests by a health care provider for treatment;
2. uses or disclosures made to the individual;
3. disclosures made to the Secretary of HHS;
4. uses or disclosures that are required by law;
5. uses or disclosures that are required for the Plan's compliance with the Privacy Standards; and
6. 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. It is not individually identifiable health information. In addition, the Plan may use or disclose "summary health information" to the Sponsor for obtaining premium or cost bids or modifying, amending or terminating the group health plan. Summary health information summarizes the claims history, claims expenses or type of claims experienced by individuals for whom a plan sponsor has provided health benefits under a group health plan, and from which identifying information has been deleted in accordance with the Privacy Standards.

SECTION 4: YOUR RIGHT TO FILE A COMPLAINT WITH THE PLAN OR THE HHS SECRETARY

If you believe that your privacy rights have been violated, you may complain to the Plan. Any complaint must be in writing and addressed to the HIPAA Privacy Compliance Coordinator listed on page 1.

You also may file a complaint with the Secretary of the U.S. Department of Health and Human Services in its Office of Civil Rights (“OCR”). Complaints to the Secretary must: (1) be filed in writing, either on paper or electronically; (2) name the entity (i.e., the Plan) that is the subject of the complaint and describe the acts or omissions believed to be in violation of the applicable requirements of the Privacy Standards; and (3) be filed within 180 days of when you knew or should have known that the act or omission complained of occurred, unless OCR waives this time limit for good cause shown. You may file a written complaint with OCR by mail, fax or e-mail at the address listed below. Further, you may, but are not required to, use OCR’s Health Information Privacy Complaint Form. To obtain a copy of this form, or for more information about the Privacy Standards or how to file a complaint with OCR, contact any OCR office or go to www.hhs.gov/ocr/hipaa/.

Complaints may be filed via e-mail at the following e-mail address: OCRComplaint@hhs.gov. Alternatively, written complaints also may be filed at the following address: Region VI, Office for Civil Rights, U.S. Department of Health and Human Services, 1301 Young Street, Suite 1169, Dallas, TX 75202. Voice Phone (214) 767-4056. Fax (214) 767-0432. TDD (214) 767-8940. The Plan will not retaliate against you for filing a complaint.

SECTION 5: WHOM TO CONTACT AT THE PLAN FOR MORE INFORMATION

If you have any questions regarding this Notice or the subjects addressed in it, you may contact the HIPAA Privacy Compliance Coordinator listed on page 1.

CONCLUSION

PHI use and disclosure by the Plan is regulated by a federal law known as HIPAA. You may find these rules at 45 Code of Federal Regulations Parts 160 and 164. This Notice attempts to summarize the Privacy Standards. The Privacy Standards will supersede any discrepancy between the information in this Notice and the Privacy Standards.