CREVE COEUR SCHOOL DISTRICT NO. 76
HEALTH BENEFIT PLAN

POLICIES AND PROCEDURES
FOR FIREWALLS AND EMPLOYEE ACCESS

The Creve Coeur School District No. 76, as the Plan Sponsor and the Plan Administrator of the Health Plan Benefit Plan, on behalf of the Plan, hereby adopts the following Polices and Procedures that shall be instituted and followed by the Plan with regard to firewalls and employee access in connection with the Privacy Standards:

1. Defined Terms. The following terms shall have the meanings set forth below when used in this document:

"HIPAA" shall mean the Health Insurance Insurance Portability and Accountability Act of 1996, as amended.

"Plan" shall mean both the Creve Coeur School District 76 Health Benefit Plan.

"Plan Administrator" shall mean Creve Coeur School District No. 76.

"Plan Sponsor" shall mean Creve Coeur School District No. 76.

"Privacy Official" or **"Privacy Officer"** shall mean the Superintendent who has been designated as such by the Plan Administrator.

"Privacy Standards" shall mean the Standards for Privacy of Individually Identifiable Health Information enacted pursuant to HIPAA.

"Protected Health Information" or **"PHI"** shall mean individually identifiable health information, as more specifically defined in the Privacy Standards.

2. Purpose. The Plan is committed to ensuring the privacy of PHI and at all times shall comply with the requirements of the Privacy Standards, including the requirements relating to safeguarding PHI through limited access and firewalls. In the event the Privacy Standards are amended, these Policies and Procedures shall be deemed to be amended in accordance therewith. To support the Plan's commitment to privacy of PHI, the Plan will ensure that appropriate steps are taken, as more specifically set forth below.

3. Compliance Policy. The Plan shall make reasonable efforts to limit access to PHI to those individuals in the Plan Administrator's workforce who require access to PHI to carry out their duties and job responsibilities and, further, to limit their access to only the category or categories of PHI to which access is needed, upon any conditions appropriate to such access.

4. Procedure: Persons Needing Access to PHI; Categories of PHI Needed.
The following sets forth (a) the title or classes of persons in the Plan Administrator's workforce who require access to PHI to carry out their duties and job responsibilities, (b) the category or categories of PHI to which access is needed, and (c) any conditions appropriate to that access:

Title/Class of Persons	Categories of PHI	Conditions to Access
Superintendent	All Categories	None
Administrative Staff Designated by the Superintendent	All Categories	None
Bookkeeper	All Categories	None

5. Restrictions on Use. The above persons must be advised that (a) PHI may not be used or disclosed for any purpose other than those related to treatment, payment, and health care operations (each, as defined in the Privacy Standards) activities under the Plan, unless proper authorization is first obtained; (b) PHI may not be used or disclosed in connection with any employee benefit or employee benefit plan other than the Plan, unless proper authorization is first obtained; (c) PHI must not be used or disclosed for any employment-related decisions, such as hiring, promotions or terminations; and (d) PHI may not be used or disclosed for any employment-related decisions, such as leaves of absence, drug testing and compliance with the Americans with Disabilities Act, unless proper authorization is first obtained.

6. Checklist. The Plan Administrator shall take steps to ensure that it meets all of the requirements set forth in the following checklist, and the Privacy Official shall monitor this compliance on an on-going basis:

- Review and limit access to PHI to those employees not described above.
- Locate PHI in a place and manner that eliminates unauthorized access.
- Mark PHI as "PHI" to the extent possible to lessen the likelihood of inadvertent review by unauthorized personnel.
- Password-protect access to PHI on computers to authorized personnel only. Prohibit computers to be left unattended with PHI on the screen and install automatic log off systems.
- Destroy or discard unneeded PHI in a manner that prohibits its review by unauthorized personnel.
- Move fax machines over which PHI is sent or received to a secure location.
- Train employees with employment related functions and plan related functions of their duty or not use PHI for employment related decisions.

7. Effective Date. This Policy shall be effective on April 14, 2004, and shall be therefore implemented by the Privacy Officer. Accordingly, the School District, as the Plan Sponsor and the Plan Administrator, has executed this Policy as of the effective date set forth below.

Effective the 14th day of April, 2004.

Superintendent:_____

Attest:

Bookkeeper:_____

Adopted June 2004