

## DSBPC Privacy Notice About the Use of Your Personal Medical Information

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.

The Pasco County School District has numerous legal and ethical obligations to protect the privacy of information it receives about students and employees. All student records, including health information, are protected by the Family Educational Rights and Privacy Act of 1974 (FERPA) as well as various Florida Statutes. Information covered by FERPA are excluded from coverage under the Health Insurance Portability and Accountability Act of 1996 (HIPAA).

The purpose of this notice is to provide you with information about requirements under HIPAA.

The employee group health plans (administered by insurance carriers) are covered by HIPAA, and must comply with the privacy requirements as of April 14, 2003. The group dental plan and medical reimbursement accounts must comply with HIPAA privacy requirements by April 14, 2004. However, each of the insurance companies administering these plans is required on their own to comply by April 14, 2003, and is responsible for distributing their own Notice of Privacy Practices to you, the plan participants.

The terms “information” or “health information” in this notice include any personal information that is created or received by us that relate to your physical or mental health or condition, the provision of health care to you or the payment of such health care.

### How Pasco County Schools May Use or Disclose Your Health Information

Pasco County Schools does not receive Protected Health Information (PHI) from any current group health plan or insurance carrier. Other than information necessary for enrollment or disenrollment in the benefit plans, the only information Pasco County Schools receives related to claims or treatment is as “summary health data” and does not identify individual employees or family members. However, Pasco County Schools may receive individual health information about you in our role as employer, for purposes such as Workers’ Compensation, sick leave bank, Family & Medical Leave under FMLA or eligibility for disability plans. This information is not covered by HIPAA; however, it is our practice to protect the confidentiality of this information, to maintain or disclose only the minimum necessary, and to disclose only to those with a direct need to know.

The following categories describe the ways that Pasco County Schools may use and disclose your health information. For each category of uses and disclosures, there is an explanation and examples. Not every use or disclosure in a category will be listed. However, all the ways Pasco County Schools is permitted to use and disclose information will fall within one of the categories.

**1. Workers Compensation**—Pasco County Schools may use or disclose health information about you to assure that you receive benefits to which you are due under Workers’ Compensation if you have a work-related injury or illness. For example, Pasco County Schools may receive information about your treatment from your physician, and disclose it to our workers compensation insurance carrier so that your medical bills are paid.

**2. Sick Leave Bank/Disability Plans**—Pasco County Schools may request and use health information about you to determine eligibility for plan benefits, determine plan responsibility for benefits and to coordinate benefits. For example, Pasco County Schools may require a doctor’s statement from you to verify that you are eligible to receive pay for time off due to sickness.

**3. Family & Medical Leave Requests**—If you request a leave for medical reasons under FMLA, Pasco County Schools will request a certification from your physician, and will use the information on that certification to determine your eligibility for leave.

**4. Reasonable Accommodation Request under ADA**—If you have a disability that is covered under the Americans with Disability Act (ADA) and you request a reasonable accommodation in order to perform the essential functions of your job, we will request and use medical information provided by you to determine how we may be able to provide the accommodation.

**5. Judicial and Administrative Process or Law Enforcement**—As required by law, Pasco County Schools may use and disclose your health information when required by a court order. Pasco County Schools may disclose your health information to a law enforcement official for purposes such as identifying or locating a suspect, fugitive, material witness or missing person, complying with a court order or subpoena and other law enforcement purposes.

**6. Public Health**—As required by law, Pasco County Schools may disclose your health information to public health authorities for purposes related to: preventing or controlling disease, injury or disability; reporting child abuse or neglect; reporting domestic violence; reporting to the Food and Drug Administration problems with products and reactions to medications and reporting disease or infection exposure.

## Physical and Administrative Protection of Your Health Information

As stated above, it is our practice that responsibility for protection of your health information related to group health plans is delegated to the insurance carrier for each plan, and the Pasco County Schools does not receive any PHI except as may be necessary for enrollment or disenrollment in a plan. Regarding any other health information Pasco County Schools may have access to, such as information related to a disability claim, Pasco County Schools requests only the minimum amount of information necessary for the purpose, and keeps that information in a file separate from your personnel file. Only those with a specific need to know are allowed access to the information. If Pasco County Schools should need to use or disclose your health information for any purposes other than as described in this Notice of Privacy Practices, Pasco County Schools will do so only with your authorization to use or disclose your health information for another purpose, you may revoke your authorization in writing at any time. If you revoke your authorization, Pasco County Schools will no longer be able to use or disclose health information about you for the reasons covered by your written authorization, though Pasco County Schools will be unable to take back any disclosures that have already made with your permission. Pasco County Schools has established procedures for the destruction of obsolete records that are intended to prevent any accidental or unauthorized disclosure of confidential information. These procedures include the shredding of paper records and the physical destruction of computer media and hard drives that have contained confidential information prior to any sale or re-assignment of the machine.

## Changes to this Notice of Privacy Practices

Pasco County Schools reserves the right to amend this Notice of Privacy Practices at any time in the future and to make the new Notice provisions effective for all health information that it maintains. Pasco County Schools will promptly revise our Notice and distribute it to you whenever material changes are made to the Notice.

## Complaints

Complaints about this notice of Privacy Practices or how Pasco County Schools has handled your health information can be directed to: Employee Benefits & Risk Management,  
7227 Land O' Lakes Blvd.  
Land O' Lakes, Florida 34638  
or via e-mail at EbarmPDH@pasco.k12.fl.us.

Effective Date of this Notice: April 14, 2003.

## Sunbelt Worksite Marketing Privacy Notice

This notice applies to products administered by Sunbelt Worksite Marketing. Sunbelt takes your privacy very seriously. As a provider of products and services that involve compiling personal—and sometimes, sensitive—information, protecting the confidentiality of that information has been, and will continue to be, a top priority of Sunbelt. This notice explains how Sunbelt handles and protects the personal information we collect. Please note that the information we collect and the extent to which we use it will vary depending on the product or service involved. In many cases, we may not collect all of the types of information noted below. Sunbelt's privacy policy is as follows:

- I. We collect only the customer information necessary to consistently deliver responsive services. Sunbelt collects information that helps serve your needs, provide high standards of customer service and fulfill legal and regulatory requirements. The sources and types of information collected generally vary depending on the products or services you request and may include:
  - Information provided on enrollment and related forms - for example, name, age, address, Social Security number, e-mail address, annual income, health history, marital status and spousal and beneficiary information.
  - Responses from you and others such as information relating to your employment and insurance coverage.
  - Information about your relationships with us, such as products and services purchased, transaction history, claims history and premiums.
  - Information from hospitals, doctors, laboratories and other companies about your health condition, used to process claims and prevent fraud.
  
- II. Under HIPAA, you have certain rights with respect to your protected health information. You have rights to see and copy the information, receive an accounting of certain disclosures of the information and, under certain circumstances, amend the information. You also have the right to file a complaint with the Plan in care of Sunbelt's Privacy Officer or with the Secretary of the U.S. Department of Health and Human Services if you believe your rights under HIPAA have been violated. Additional information that describes how medical information about you may be used and disclosed and how you can get access to this information is provided by contacting Sunbelt at (800) 822-8045.