

Saint Mary's University of Minnesota
Section 125 Plan Sponsor Privacy Policy

As plan sponsor, Saint Mary's University of Minnesota ("the university") will amend the plan to comply with the HIPAA privacy regulations. These amendments will include that:

- Certain classes of employees or others are granted access to Protected health information (PHI).
- Access to PHI will be only for Section 125 plan administrative functions.
- The Section 125 plan will only permit the use and disclosure of PHI consistent with the HIPAA privacy regulations.
- The plan sponsor will agree to comply with applicable HIPAA privacy regulations if it receives PHI.
- No PHI will be used in employment-related actions or in connection with any other employee benefit plan.
- PHI will be accessible to individuals, available for amendment, and available for an accounting for disclosures consistent with HIPAA privacy regulations. As the HIPAA privacy regulations change, the university will amend the plan to comply with the changes.

As the plan sponsor, the university will comply with the terms of the plan regarding the use of protected health information as required by HIPAA.

As the plan sponsor, the university will:

- Make the required certifications as to its use of the PHI (including as plan sponsor).
- Not use the PHI for employment or other benefit-plan purposes.
- Assist in the implementation of the amendment, access, and accounting rights provided in the Section 125 plan.
- Restrict access to PHI so that employees of the university do not access PHI unless it is part of their job duties with respect to plan management.
- Use the PHI only for plan administration purposes.

Records regarding PHI disclosures will be maintained for six years as required by HIPAA privacy regulations.

All disclosures made by the Section 125 plan entity for the last six years, other than for treatment, payment, or healthcare operations, may be requested for an accounting by an individual Section 125 plan participant.

Paul Wildenborg is designated as the privacy officer for compliance with the HIPAA privacy regulations.

Section 125 plan participants have the right to access, inspect, and copy their PHI that is maintained by the plan in accordance with HIPAA privacy regulations.

Section 125 plan participants have the right to request the amendment of PHI.

Section 125 plan participants can request restrictions on the uses and disclosures of PHI; however, the plan can decline to comply with such requests.