

## **Privacy and Security Statement**

### **Privacy - Compliance Required and Achieved April 14, 2003**

Compcare Health Services Insurance Corporation dba CommunityConnect HealthPlan (CommunityConnect) was in compliance with the provisions of the HIPAA Privacy Rule by the required date of April 14, 2003. Compliance efforts included, but were not limited to, the appointment of a Privacy and Security Officer, establishment of a Privacy Office, and creation of an infrastructure designed to support ongoing compliance requirements throughout the company, the adoption and communication of policies, standards, and procedures, and the annual training of all associates.

CommunityConnect has adopted policies and procedures that meet compliance with the HIPAA Privacy regulation including the granting of the following individual rights:

- The right to have access to designated records that contain protected health information (PHI).
- The right to request an amendment to PHI contained in designated records.
- The right to request restrictions on the use and disclosure of PHI for treatment, payment, and health care operations.
- The right to receive confidential communications at an alternate address or location.
- The right to request a disclosure accounting.
- The right to voice a complaint pertaining to CommunityConnect's privacy policies and procedures.

Privacy notices are distributed to all fully insured subscribers describing the company's use and disclosure of PHI. These notices are available on **[www.CommunityConnectHealthPlan.com](http://www.CommunityConnectHealthPlan.com)**.

CommunityConnect and its affiliates are committed to delivering excellent service. Part of that commitment includes compliance with and support of the HIPAA Privacy mandate. Most importantly, we are committed to protecting member and patient privacy and safeguarding related health information.

### **Security - Compliance Required and Achieved April 20, 2005**

CommunityConnect achieved compliance with the provisions of the HIPAA Security Rule by the required date of April 20, 2005. Compliance efforts included, but were not limited to, the appointment of a Corporate Information Security Officer, establishment of an Information Security Compliance Office, and the creation of an infrastructure designed to support ongoing compliance requirements throughout the company including the adoption and communication of policies, standards, and procedures, and the training of all associates.

CommunityConnect is compliant with the HIPAA Security regulation through its corporate Information Assurance program designed to:

- Maintain an information assurance risk management program
- Protect the confidentiality, integrity, and availability of electronic PHI
- Utilize administrative, physical, and technical safeguards to address reasonably anticipated threats and hazards to electronic PHI
- Continually evaluate the effectiveness and adequacy of the program

CommunityConnect is committed to delivering excellent service. Part of that commitment includes compliance with and support of the HIPAA Security mandate. Most importantly, we are committed to protecting member and patient privacy and safeguarding related health information.

CommunityConnect is aware of and will comply with the changes made to the HIPAA Privacy and Security laws and regulations as part of the American Recovery and Reinvestment Act.