



MONTEFIORE MEDICAL CENTER
EMPLOYEE HEALTH & WELFARE BENEFIT PLAN
POLICY AND PROCEDURE

SUBJECT: PRIVACY AND SECURITY OF PROTECTED HEALTH INFORMATION			
OWNER: MONTEFIORE MEDICAL CENTER EMPLOYEE HEALTH & WELFARE BENEFIT PLAN			
EFFECTIVE	REVIEW/REVISED:	SUPERSEDES	02/17

Purpose:

The purpose of this Policy is to confirm that the Montefiore Medical Center Employee Health & Welfare Benefit Plan (“the Plan”) is subject to the equivalent and/or greater expectations and standards as the rest of the Montefiore Health System with respect to the security and privacy of protected health information (PHI). The Plan is required to protect PHI and safeguard the confidentiality, integrity, and availability of member information to guard against the unauthorized access, disclosure, or release of such information.

Policy:

The Montefiore Health System Policies and Procedures, including but not limited to the most recent versions of the following Administrative Policies & Procedures, govern the Plan:

- JH40.1 HIPAA Complaints, Investigations and Sanctions
- JH41.1 Protected Health Information Uses and Disclosures
- JH69.1 Electronic Protected Health Information Security
- JH70.1 Access to Electronic Health Records
- JH71.1 Right to Restrict Access to Protected Health Information by Health Plan
- JH72.1 IT Incident Response Plan

Collectively, these policies shall be referred to as the “Montefiore Privacy and Information Security Policies,” and all such policies are incorporated by reference herein. This policy should be read in conjunction with Montefiore Privacy and Information Security Policies and other administrative policies that may affect the use and disclosure of health information.