



The College will ensure that adequate separation between the Plan and the College is established and supported by reasonable and appropriate security measures with respect to electronic PHI.

Access to and use and disclosure of PHI will be limited to only those employees of the College who have a need for the PHI in conjunction with their performance of plan administration functions for the Plan, including any employee who receives PHI relating to payment under, health care operations of, or other matters pertaining to the Plan in the ordinary course of business. The College anticipates that the following employees will have access to PHI in connection with the administration of the Plan.

- James Mulholland, Director of Compensation and Risk Management
- Julie Dressler, Staff Accountant
- Mary Greiner, Assistant Vice President of Human Resources
- Stacy Koehler, Associate Director of Human Resources
- Jana Johnson, Associate Director of Human Resources
- Nancy Combs, Controller and Assistant Treasurer
- Shannon Nowotny, Administrative Support Assistant

If the persons described above do not comply with the conditions set forth in this Notice, the College will provide for a mechanism for resolving issues of noncompliance, including appropriate disciplinary sanctions.

When PHI received from the Plan is no longer needed for the Plan administrative functions for which the disclosure was made, the College will, if feasible, return or destroy all PHI, in whatever form or medium received from the Plan, including all copies of any data or compilations derived from and/or revealing an individual's identity. If it is not feasible to return or destroy all the PHI, the College will limit the use of disclosure of PHI it cannot feasibly return or destroy to those purposes that make the return or destruction of the information infeasible.