

**AMENDMENT NO. FOUR
TO THE
UNIVERSITY OF COLORADO HEALTH AND WELFARE PLAN AND TRUST
HIPAA SECURITY POLICY**

WHEREAS, The Regents of the University of Colorado, a body corporate and a state institution of higher education of the State of Colorado (the "University" or "University of Colorado"), as the Plan Sponsor of the University of Colorado Health and Welfare Plan ("Health and Welfare Plan") and the health care flexible spending account component of The University of Colorado Flexible Benefits Plan and the University of Colorado Hospital Authority, a body corporate and political subdivision of the State of Colorado, as Plan Sponsor of the health care spending account plan component of the University of Colorado Hospital Authority Cafeteria Plan and the Trust Committee of the University of Colorado Health and Welfare Trust (the "Trust") are responsible for maintaining the University of Colorado Health and Welfare Plan and Trust HIPAA Security Policy (the "Security Policy"); and

WHEREAS, the University and Trust Committee wish to amend the Security Policy, effective July 1, 2013, except as otherwise provided herein.

NOW THEREFORE, the Security Policy is amended effective July 1, 2013, except as otherwise provided herein, to read as follows:

1. The first paragraph of the Section A. Introduction of the Security Policy is further amended effective July 1, 2013 to read as follows:

"A. Introduction

The University of Colorado Health and Welfare Plan ('H&W Plan') is sponsored by The Regents of the University of Colorado, a body corporate and a state institution of higher education of the State of Colorado ('University') and contains the following component self-funded benefits which are funded through the University of Colorado Health and Welfare Trust ('Trust'):

1. CU Health Plan- Access Network (*Membership frozen. Only available to subscribers who were subscribers as of June 30, 2010 who have continuously subscribed.*);
2. CU Health Plan – High Deductible;
3. CU Health Plan-Exclusive;
4. Health Risk Assessment Program;
5. CU Health Plan-Administered by Kaiser Permanente Insurance Company;
6. CU Health Plan-Medicare; and

7. CU Health Plan- Vision.

In addition, the Trust is the funding vehicle for the following plans:

8. Health Care Flexible Spending Account Component of The University of Colorado Flexible Benefits Plan ('University Flex Plan') which is sponsored by the University; and
9. Health Care Spending Account Plan of the University of Colorado Hospital Authority Cafeteria Plan ('UCH Flex Plan') which is sponsored by the University of Colorado Hospital Authority ('UCH')."

2. Section I of the Security Policy is amended effective July 1, 2013 in its entirety to read as follows:

"I. Security Official

Chirag Joshi is the Security Official for the Plan. The Security Official is responsible for the development and implementation of the Plan's policies and procedures relating to security, including but not limited to this Policy."

3. Exhibit A of the Use and Disclosure Procedures is amended in its entirety effective July 1, 2013, to read as follows:

**"Exhibit A
to the University of Colorado Health and Welfare Plan and Trust
HIPAA Security Policy**

**List of the Members of the Workforce
Who May Have Access to PHI**

University of Colorado Health and Welfare Plan ('H&W Plan')

and

Health Care Flexible Spending Account Component of the University of Colorado Flexible Benefit Plan ('Health Care FSA')

Job Title/Classification

Any officer or employee of the Plan Administrator, including but not limited to personnel in the

CU Health Plan Administration, who performs functions on behalf or related to administration of the H&W Plan and/or Health Care FSA, such as benefit design and administration, audit, legal, accounting and systems support

Vice President of Budget and Finance for the University of Colorado, or his or her successor

Any other employee of the University of Colorado who needs access to PHI in order to perform Plan administration functions that the Plan Sponsor performs for the H&W Plan and/or the Health Care FSA (such as quality assurance, claims processing, auditing, monitoring, payroll, and appeals (if applicable))

Health Care Spending Account Plan of the University of Colorado Hospital Authority Cafeteria Plan

Job Title/Classification

Vice-President for Human Resources, University of Colorado Hospital Authority

Director, Benefits, University of Colorado Hospital Authority

Manager, Benefits, University of Colorado Hospital Authority

Benefits Specialist, University of Colorado Hospital Authority

HR Benefits Analyst, University of Colorado Hospital Authority”

The University of Colorado, University of Colorado Hospital Authority and the Trust agree to Amendment No. Four to the Security Policy effective as of the effective date of such amendment and the Security Policy.

This Amendment No. Four may be executed in multiple counterparts and may be delivered by fax or other electronic means, each of which shall be deemed to be an original, and all of which together shall constitute one and the same document.


APPROVED

**THE REGENTS OF THE UNIVERSITY
OF COLORADO**, a body corporate and a state institution
of higher education of the State of Colorado

By 
Bruce Benson
President

Date 6-28-13

**UNIVERSITY OF COLORADO HOSPITAL
AUTHORITY**, a body corporate and political
subdivision of the State of Colorado

By 
Jeffrey Johnson
Vice President of Human Resources

Date 11-27-13

**UNIVERSITY OF COLORADO HEALTH AND
WELFARE TRUST**

By 
E. Jill Pollock
Chairperson, Trust Committee

Date 7/1/2013

**APPROVED AS TO LEGAL SUFFICIENCY
OFFICE OF UNIVERSITY COUNSEL**

By 
Jeremy Hüth
Managing Associate University Counsel
Special Assistant Attorney General

Date 6/28/13

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Jeffrey Johnson
Vice President of Human Resources


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UNIVERSITY OF COLORADO HEALTH AND
WELFARE TRUST

By 
E. Jill Pollock
Chairperson, Trust Committee

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Managing Associate University Counsel
Special Assistant Attorney General

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