

Privacy policy and member disclosure

At Independence Blue Cross, protecting your privacy is very important to us. That is why we have taken numerous steps to see that your protected health information (PHI) is kept confidential. Protected health information is individually identifiable health information about you. This information may be in oral, written, or electronic form. Independence Blue Cross may obtain or create your PHI while conducting its business of providing you with health care benefits.

Independence Blue Cross has implemented extensive policies and procedures regarding the collection, use, and release or disclosure of PHI by and within our organization. We continually review our policies and monitor our business processes to make sure that your information is protected, while assuring that the information is available as needed for the provision of health care services. For example, our procedures include steps to assist us in verifying the identity of someone calling to request PHI, procedures to limit who on our staff has access to your PHI, and to share only the minimum amount of information when PHI must be disclosed. We also protect any PHI transmitted electronically outside our organization by using only secure networks or by using encryption technology if the information is sent by email.

We do not use or share your PHI without your permission unless the law allows us to do so. Before using or disclosing your PHI for other purposes, we'll obtain your written permission, also called an authorization. You may also direct us to share your PHI with someone you chose by giving us your written authorization. However, this authorization must include certain specific information in order to be valid. You may print a copy of our *Authorization to Release Information* form from our website ibx.com or request a copy by calling our Privacy Office at [215-241-4735](tel:215-241-4735).

We are permitted to use or disclose your PHI for our payment and health care operations. Examples of these activities include paying claims for services you've received, coordinating the delivery of health care services, and monitoring the performance of our network providers to improve health care outcomes. We may also share your PHI in certain other circumstances, such as disclosures to health care oversight agencies for legally authorized health oversight activities like audits and investigations, or when

What you need to know

- How we protect your personal health information
- What's considered emergency care
- How we make coverage decisions
- You have a right to challenge a coverage decision you disagree with

we are required to do so by law. We may also share certain information with the sponsor of your group health plan so that they may perform their plan administration functions.

The laws that protect your privacy also give you certain rights related to your PHI. For example, you may request a copy of your PHI that we have in our "Designated Record Set." Please remember that Independence Blue Cross does not typically have copies of your medical records. Your health care provider should be contacted for copies of your medical records.

Please review our Notice of Privacy Practices for more detailed information about your privacy rights and how we may use and share your PHI. You may view or print a copy of our notice from our website ibx.com by clicking on Privacy Policies, or you may call our Privacy Office at [215-241-4735](tel:215-241-4735) to request that a copy of the notice be mailed to you.

Member disclosure

Emergency services

An emergency is defined as the sudden and unexpected onset of a medical or psychiatric condition manifesting itself in acute symptoms of sufficient severity or severe pain — such that a prudent layperson who possesses an average knowledge of health and medicine could reasonably expect the absence of immediate medical attention to result in:

- placing the health of the member or with respect to a pregnant member, the health of the pregnant member or her unborn child, in serious jeopardy;
- serious impairment to bodily functions;
- serious dysfunction of any bodily organ or part.

Emergency care includes covered services provided to a member in an emergency, including emergency transportation and related emergency services provided by a licensed ambulance service.

Utilization review

To assist Independence Blue Cross in making coverage determinations regarding the medical necessity and appropriateness of requested services, Independence Blue Cross uses medical guidelines based on clinically credible evidence. This is called utilization review. Utilization review can be done before a service is performed (prenotification/precertification/preservice); during a hospital stay (concurrent review); or after services have been performed (retrospective/post-service review). Independence Blue Cross follows applicable state/federal standards pertaining to how and when these reviews are performed.

Complaints and grievances

You have a right to appeal any adverse decision through the Complaint and Grievance Process. Instructions for the appeal will be described in the denial notifications issued to you and in your benefits booklet.

