

HIPAA Compliance Statement

A message to our members, group health plan clients, provider and payor partners and business associates:

NVA is committed to protecting the privacy of the health information of its members, to maintaining the security of its paper, oral and electronic submissions of health information, and to complying with the standard electronic transactions provisions, as required by the Health Insurance Portability and Accountability Act of 1996, the regulations promulgated thereunder, {HIPAA} and the changes mandated by the HITECH Act.

NVA has determined that it is a business associate of its insurance company/payor partners and the group health plans for which it administers self-funded vision benefits. As a business associate, NVA realizes that its compliance with HIPAA is essential for both its payor partners and its group health plan clients to be fully compliant with the law.

To achieve NVA's goal of becoming compliant with HIPAA, and as required by its business associate agreements, NVA has completed the following:

- We have formed a Compliance Committee that includes senior level management and other staff whose job responsibilities are affected by HIPAA. This task force oversees all aspects of NVA's HIPAA compliance.
- We have appointed a Security Officer and a Privacy Officer.
- We have assessed the impact of HIPAA on our business processes and systems.
- We have modified our systems to send and receive standard electronic transactions.
- We have implemented a training program for our staff on the Privacy and Security requirements of HIPAA.
- We have drafted and implemented a Privacy Policy. We have changed many of our internal processes and procedures to comply with this policy.
- Each member of our staff has signed a Confidentiality Agreement, in which he or she will agree to abide by the provisions of our Privacy Policy and to protect all member information.
- We have assessed the protected health information that we receive and transmit to determine the necessity of these transactions and to ensure that they are in full compliance with HIPAA and our obligations under our business associate contracts.
- We have committed to continue to monitor HIPAA regulation changes, to continue to review how our processes and procedures are affected by HIPAA, and to comply with these changes as quickly as possible.

We are confident that our focus and commitment will ensure the greatest level of privacy and security of all member protected health information, while minimizing any impact on our high standards for customer service.

Please feel free to contact NVA's Compliance Officer at 973-574-2470 for further information or with any questions about NVA's compliance with HIPAA.