

## PATRIOT RETIREES VOLUNTARY EMPLOYEES' BENEFICIARY ASSOCIATION

## PUBLIC DISCLOSURE POLICY AS OF January 1, 2014

- 1. Disclosure to Participants and Beneficiaries.
  - a. The Plan will disclose to Plan Participants and Beneficiaries those documents required by law, which shall consist of:
    - i. The current Plan Document, with any amendments.
    - ii. The Summary Plan Description (if separate from the Plan Document) and any Summaries of Material Modifications.
    - iii. Any insurance contracts through which benefits are directly provided.
    - iv. The Agreement and Declaration of Trust.
    - v. The most recently filed Form 5500, with attachments.
    - vi. The most recently filed Form 990.
    - vii. The most recent Summary Annual Report.
  - b. Notwithstanding the forgoing, the Plan will not disclose any information that would violate HIPAA or any other applicable privacy law, rule or regulation.
  - c. Fees.
    - i. Those documents required to be provided free of charge (including the Summary Annual Report provided annually, the Summary Plan Description and Summaries of Material Modification provided periodically) will be provided without charge.
    - ii. Other documents subject to disclosure:
      - 1) Will be provided for inspection free of charge in the Plan's office in Triangle, VA.
      - 2) Copies will be provided by regular mail at the Plan's actual cost, not to exceed 25¢ per page.



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- 2. Disclosures to Health Care Providers and other HIPAA-covered entities and Business Associates will be provided in accordance with the Plan's HIPAA disclosure and privacy policy, consistent with applicable law and regulations.
- 3. Disclosures in the context of claims and appeals will be made in accordance with the Plan's claims and appeals procedures, as required under applicable law and regulations.
- 4. Other disclosures will be made as follows:
  - a. Other legally-required disclosures will be made in a manner consistent with applicable law, including any required privacy protections.
  - b. Other non-required disclosures will only be made with the express authority of the Board of Trustees or its delegate, and will be made in a manner protective of individual privacy and other legally-required restrictions and protections.
  - c. Except as otherwise required by law, disclosures will not be made of trade secrets and other confidential matters, documents subject to privilege (including attorney/client privilege), matters subject to non-disclosure agreements or protective orders, and matters prohibited from disclosure under HIPAA and other applicable privacy laws.