

Aetna Life Insurance Company (Aetna)  
RFP # 270-20220830TPAS  
Third Party Administrative Services  
September 28, 2022

### Request for Clarification #1

- 1. Minimum Requirement #4:** The SOC2 Aetna provided covers the MWDC data center and does not include any business applications assertions. The Plan requests Aetna to confirm that only the MWDC data center system will be used for the purpose of collecting, storing, transmitting, or exchanging the Plan's data to perform TPA services. If not, the Plan requests Aetna to provide the business application name(s) and their associated assertion(s) that will be used to perform TPA services.

System Name	Security Attestation Type	Initial Report Date	Bridge Letter 1	Bridge Letter 2
CVS Health Middletown and Windsor Data Centers' ("MWDC") Center Service System	SOC2, Type II	Jul 18 2020	Jun 30 2021	Jul 18 2022

**Answer:**

Confirmed. The Middletown and Windsor Data Center System (MWDC) will be the only data center system used for the purpose of collecting, sorting, transmitting, or exchanging the Plan's data to perform TPA Services.

- 
- 2. Minimum Requirement #10, Attachment H: HIPAA Questionnaire, Question #7:** In response to Question #7 that requires Aetna to provide copies of all internal/employee-facing privacy policies and procedures, Aetna only provided its Privacy Program Overview. Therefore, the Plan requests Aetna to provide copies of all internal/employee-facing privacy policies and procedures in order for the Plan to evaluate the sufficiency of Aetna's privacy practices.

**Answer:**

We have attached all our internal/employee-facing privacy policies and procedures in the *Privacy Policies- Aetna (09-29-22).zip* file. Please note that we have included internal privacy policies that are issued by our parent company, CVS Health. These policies are applicable to all employees across the enterprise, including Aetna. We have included a list of all these documents below.

Similar to the Privacy Program Overview, we consider these documents to be proprietary and confidential and would like to formally redact them from public records release per the provisions in the HIPAA Questionnaire.

Document ID	Document Title
AETPRO-070144	GLBA Notice of Information Practices
CHIP-0001	Internal Sanctions Policy & Procedure
CHIP-0003	General Use and Disclosure of Protected Health Information (PHI) and ePHI
CHIP-0004	Privacy Training
CHIP-0006	Authorization for Use and Disclosure of Protected Health Information
CHIP-0008	Legal Requests for PHI
CHIP-0010	Privacy Complaints
CHIP-0011	Alternative Communications
CHIP-0012	Minimum Necessary Use and Disclosure of PHI and ePHI
CHIP-0013	Restriction of Further Use and Disclosure of PHI
CHIP-0014	Amendment of Designated Record Set (DRS)
CHIP-0015	Access to Records
CHIP-0017	Notice of Privacy Practices
CHIP-0018	De-identification of Protected Health Information (PHI)
CHIP-0020	CVS Health Corporate Breach Notification Policy and Procedure
CHIP-0024	Mitigation of Improper Disclosure
CHIP-0027	Business Associate Use and Disclosure of PHI
CHIP-0028	Personal Representative
CHIP-0031	Use and Disclosure of PHI for Marketing Purposes
CHIP-0036	CVS Health Privacy Policy Creation, Review, and Revision
CHIP-049692	Designated Record Set (DRS)
CHIP-051171	Accounting of Disclosures
CHIP-051819	HIPAA Permitted Uses and Disclosures of PHI for Research
CHIP-057918	General HIPAA Privacy Policy
CHIP-069023	CVS Health Biometric Data Privacy Policy
IFGV-050900	External Communications and Mailings of Sensitive Personal Information

---

---

**Sign Clarification:**

**Offeror:** Aetna Life Insurance Company

**Authorized Signature:**



A handwritten signature in blue ink, appearing to be 'Tami Polsonetti', written over a horizontal line.

**Name and Titled (Typed):** Tami Polsonetti, Assistant Vice President

**Date:** 9/29/22