

## **NOTICE OF PRIVACY PRACTICES**

Effective Date: 04/14/03

**THIS NOTICE DESCRIBES HOW MEDICAL INFORMATION ABOUT YOU MAY BE USED AND DISCLOSED AND HOW YOU CAN GET ACCESS TO THIS INFORMATION. PLEASE REVIEW IT CAREFULLY.**

If you have any questions about this notice, please contact the Director of HIPAA Compliance by calling 317-216-2842.

### **OUR PLEDGE REGARDING MEDICAL INFORMATION**

This Notice of Privacy describes how we may use and disclose your protected health information to carry out treatment, payment or health care operations and for other purposes permitted or required by law. It also describes your rights to access and control your protected health information.

The following categories describe different ways that we use and disclose medical information. For each category of uses or disclosures we will explain what we mean and try to give some examples. Not every use or disclosure in a category will be listed. However, all of the ways we are permitted to use and disclose information will fall within one of the categories. Information may be disclosed in writing, orally or electronically.

#### **1. USES AND DISCLOSURES OF PROTECTED HEALTH INFORMATION**

Your protected health information may be used and disclosed by Methodist Occupational Health Centers, Inc and Affiliates, our employees and others that are involved in your care and for the purpose of providing health care services to you. Your protected health information may be disclosed to pay your health care bills and to support Methodist Occupational Health Centers, Inc and Affiliates operations.

##### **For Treatment**

- We may use your medical information to provide you with treatment or services.
- We may disclose your medical information to doctors, nurses, technicians, medical students or other personnel who are involved in your care.
- We may disclose medical information about you to people outside Methodist Occupational Health Centers, Inc and Affiliates who may be involved in your medical care after you leave, such as family members, clergy or others we use to provide services that are part of your care.

For example, a doctor treating you for a broken leg may need to know if you have diabetes, because diabetes may slow the healing process. Different departments may share medical information about you in order to coordinate the different things you need.

##### **For Payment**

- We may use and disclose your medical information so that treatment and services you receive at the clinic may be billed to and payment may be collected from you, an insurance company or a third party.

For example, we may need to give your health plan information about your treatment received at the clinic so your health plan will pay us or reimburse you for the services. We may also tell your insurance carrier about treatment that you are going to receive in the future, to obtain prior approval or to find out if they will pay for the treatment.

## **For Health Care Operations**

- We may use and disclose medical information about you for our business operations. These uses and disclosures are necessary to run Methodist Occupational Health Centers, Inc and Affiliates and make sure that all of our patients receive quality care.
- For example, we may use medical information to review our treatment and services and to evaluate our performance.
- We may combine medical information about many patients to decide what additional services we should offer, what services are not needed and whether certain new treatments are effective.
- We may disclose information to doctors, nurses, technicians, medical students and other personnel for review and learning purposes.
- We may combine the medical information we have with medical information from other hospitals/clinics to compare how we are doing and see where we can make improvements in the care and services we offer.
- We may remove information that identifies you from this set of medical information so others may use it to study health care and health care delivery without learning the identities of the specific patients.

## **Business Associates**

We contract with outside organizations, called business associates, to perform some of our operational tasks on our behalf. Examples would include billing agencies and a copy service we use when making copies of your health record. When these services are performed, we disclose the necessary health information to these companies so that they can perform the tasks we have asked them to do, and bill you or your third-party payer for services rendered. To protect your health information, however, we require the business associate to appropriately safeguard your information.

## **Appointment Reminders**

We may use and disclose your medical information to remind you of appointments for treatment, annual exams or prescription refills.

## **Treatment Alternatives**

We may use and disclose medical information to tell you about or recommend possible treatment options or alternatives that may be of interest to you.

## **Health-Related Benefits and Services**

We may use and disclose medical information to tell you about health-related benefits or services. For example, this may include a new surveillance program that we may offer.

## **Individuals Involved in Your Care or Payment for Your Care**

- We may disclose your protected health information to a friend or family member or other person specifically designated by you and who is involved in your medical care.
- We may also give medical information to someone who helps to pay for your care.
- We may tell friends and family about your condition and that you are in the hospital.
- We may disclose information about you to an entity assisting in disaster relief efforts so that your family can be notified about your condition, status and locations.

## **Research**

All research projects are subject to a special approval process which evaluates a proposed project and its use of medical information, trying to balance the potential benefits of research with patients' needs for privacy of their medical information. Before we use or disclose medical information for research, the project will have been approved through this research approval process.

- We may release information about you to researchers preparing to conduct a research project who need to know how many patients have a specific health problem.
- A research project may involve comparing the health and recovery of all patients who received one medication to those who received another for the same condition. In that situation, you would not be identified or contacted, but your medical information may be used but kept confidential.
- If a doctor caring for you believes you may be interested in, or benefit from, a research study, your doctor and the committee will approve someone to contact you to see if you are interested in the study. At that time, you would be contacted with more information and you would have the right to authorize continued contact or refuse further contact.

## **To Avert a Serious Threat to Health or Safety**

We may use and disclose medical information about you when necessary to prevent a serious threat to your health and safety or the health and safety of the public or another person. Any disclosure, however, would only be to someone able to help prevent the threat.

## **Organ and Tissue Donation**

If you are an organ donor, we may release medical information to organizations that handle organ procurement or organ, eye or tissue transplantation, or to an organ donation bank as necessary to facilitate organ or tissue donation and transplantation.

## **Military and Veterans**

If you are a member of the armed forces, we may release medical information about you as required by military command authorities. We may also release medical information about foreign military personnel to the appropriate foreign military authority.

## **Workers' Compensation**

We may release medical information about you for workers' compensation or similar programs. These programs provide benefits for work-related injuries or illnesses.

## **Public Health Risks and Patient Safety Issues**

We may disclose medical information about you for public health activities or to ensure your safety. These activities generally include the following:

- to prevent or control disease, injury or disability;
- to report births and deaths;
- to report actual or suspected child or elder abuse or neglect;
- to report reactions to medications or problems with products;
- to notify people of recalls of products they may be using;
- to notify a person who may have been exposed to a disease or may be at risk for contracting or spreading a disease or condition;
- to report mandatory disease state reporting, such as cancer registries;

- to notify the appropriate government authority if we believe a patient has been the victim of abuse, neglect or domestic violence. We will only make this disclosure when required or authorized by law.

### **Health Oversight Activities**

We may disclose medical information to a health oversight agency for activities authorized by law. These oversight activities include, for example, audits, investigations, inspections and licensure. These activities are necessary for the government to monitor the health care system, government programs and compliance with civil rights laws.

### **Communicable Disease**

We may disclose your protected health information, if authorized, to a person who may have been exposed to a communicable disease or may otherwise be at risk for contracting or spreading the disease or condition.

### **Abuse or Neglect**

We may disclose your protected health information to a public health agent authorized by law to receive reports of child abuse or neglect. In addition, we may disclose your health information to a governmental entity or agency authorized to receive such information if we believe that you have been the victim of abuse, neglect or domestic violence. In this case, the disclosure would be consistent with the requirements of applicable federal and state law.

### **Lawsuits and Disputes**

If you are involved in a lawsuit or a dispute, we may disclose medical information about you in response to a court or administrative order. We may also disclose medical information about you in response to a subpoena, discovery request or other lawful process by someone else involved in the dispute, but only if efforts have been made to tell you about the request or to obtain an order protecting the information requested.

### **Law Enforcement**

We may release medical information if asked to do so by law enforcement official:

- in response to a court order, subpoena, warrant, summons or similar process;
- to identify or locate a suspect, fugitive, material witness or missing person;
- about the victim of a crime, if, under certain limited circumstances, we are unable to obtain the person's agreement;
- about a death we believe may be the result of criminal conduct;
- about criminal conduct at the hospital; and
- in emergency circumstances to report a crime; the location of the crime or victims; or the identity, description or location of the person who committed the crime.

### **Coroners, Medical Examiners and Funeral Directors**

We may release medical information to a coroner or medical examiner. This may be necessary, for example, to identify a deceased person or determine the cause of death. We may also release medical information about patients of the hospital to funeral directors as necessary to carry out their duties.

### **National Security and Intelligence Activities**

We may release medical information about you to authorized federal officials for intelligence, counterintelligence and other national security activities authorized by law.

### **Protective Services for the President and Others**

We may disclose medical information about you to authorized federal officials so they may provide protection to the President, other authorized persons or foreign heads of state or conduct special investigations.

## **Inmates**

If you are an inmate of a correctional institution or under the custody of a law enforcement official, we may release medical information about you to the correctional institution or law enforcement official. This release would be necessary (1) for the institution to provide you with health care, (2) to protect your health and safety or the health and safety of others, or (3) for the safety and security of the correctional institution.

## **2. YOUR RIGHTS REGARDING YOUR MEDICAL INFORMATION**

### **Right to Inspect and Copy**

You have the right to inspect and copy medical information that may be used to make decisions about your care. This includes medical and billing records, but does not include psychotherapy notes.

To inspect and copy medical information that may be used to make decisions about you, you must submit your request in writing to the clinic that has your record. If you request a copy of the information, we may charge a fee for the cost of copying, mailing or other supplies associated with your request.

We may deny your request to inspect and copy in some limited circumstances. If you are denied access to medical information, you may request that the denial be reviewed. Another licensed professional (for instance, the privacy officer) chosen by Methodist Occupational Health Centers, Inc. and Affiliates will review your request and the denial. The person conducting the review will not be the person who denied your request. We will comply with the outcome of the review.

### **Right to Amend**

If you feel that medical information we have about you is incorrect, you have the right to request an amendment.

To request an amendment, your request must be made in writing and submitted to your clinic at Methodist Occupational Health Centers, Inc. and Affiliates. In addition, you must provide a reason that supports your request.

We may deny your request for an amendment if it is not in writing or does not include a reason to support the request. In addition, we may deny your request if you ask us to amend information that:

- was not created by us;
- is not part of the designated record set kept by Methodist Occupational Health Centers, Inc. and Affiliates;
- is not part of the information which you would be permitted to inspect and copy; or
- is accurate and complete.

### **Right to an Accounting of Disclosures**

You have the right to request an "accounting of disclosures." This is a list of disclosures we have made of your medical information, excluding disclosures for treatment, payment, health care operations, or disclosures you authorized in writing.

To request this list or accounting of disclosures, you must submit your request in writing to your clinic at Methodist Occupational Health Centers, Inc. and Affiliates. Your request must state a time period, which may not be longer than six years and may not include dates before April 14, 2003.

The first list you request within a 12-month period will be free. For additional lists, we may charge you for the cost of providing the list. We will notify you of the cost involved, and you may choose to withdraw or modify your request at that time, before any cost is incurred.

### **Right to Request Restrictions**

You have the right to request a restriction or limitation on the ways medical information is used. You also have the right to request a limit on the medical information we disclose about you to someone who is involved in your care or the payment for your care, like a family member or friend. For example, you could ask that we not use or disclose information about a surgery that you had.

***We are not required to agree to your request.*** If we do agree, we will comply with your request unless the information is needed to provide you emergency treatment. To request restrictions, you must make your request in writing to your clinic at Methodist Occupational Health Centers, Inc. and Affiliates. In your request, you must tell us (1) what information you want to limit; (2) whether you want to limit our use, disclosure or both; and (3) to whom you want the limits to apply – for example, disclosures to your spouse.

### **Right to Request Alternate Communication**

You have the right to request that we communicate with you about medical matters in a certain way or at a certain location. For example, you can ask that we only contact you at work or by mail.

To request alternate communications, you must make your request in writing to your clinic at Methodist Occupational Health Centers, Inc. and Affiliates. We will not ask you the reason for your request. We will accommodate all reasonable requests. Your request must specify how or where you wish to be contacted.

### **Right to a Paper Copy of This Notice**

You have the right to a paper copy of this notice. You may ask us to give you a copy of this notice at any time. Even if you have agreed to receive this notice electronically, you are still entitled to a paper copy of this notice.

### **OTHER USES OF MEDICAL INFORMATION**

Other uses and disclosures of medical information not covered by this notice or law will be made only with your written permission. If you provide us permission to use or disclose medical information, you may revoke that permission, in writing, at any time. If you revoke your permission, we will no longer use or disclose medical information about you for the reasons covered by your written authorization. Methodist Occupational Health Centers, Inc. and Affiliates is unable to take back any disclosures we have already made with your permission, and we are required to retain our records of the care that we provided to you.

### **CHANGES TO THIS PRIVACY NOTICE**

We reserve the right to change this notice. We reserve the right to make the revised or changed notice effective for medical information we already have about you, as well as any information we receive in the future. Upon your request, we will provide you with any revised Notice of Privacy by posting it on our website at mohci.com, calling the clinic and requesting that a revised copy be sent to you in the mail or asking for one at the time of your appointment here.

### **COMPLAINTS**

If you believe your privacy rights have been violated, you may file a complaint with Methodist Occupational Health Centers, Inc. and Affiliates or with the Secretary of the Department of Health and Human Services. **You will not be penalized for filing a complaint.** To file a complaint with Methodist Occupational Health Centers, Inc. and Affiliates please call Clarian Health Partners , Trust Line at 888-878-7836.