

Notice of Privacy Practices

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

Village Family Practice is required by law to maintain the privacy of your health information and to provide you with notice of its legal duties and privacy practices with respect to your health information. If you have questions about any part of this notice or if you want more information about the privacy practices at Village Family Practice, please contact our Privacy Officer.

Terms of this notice are subject to change.

Effective Date of This Notice: This notice is in effect as of August 2004

I. How Village Family Practice may Use or Disclose Your Health Information

Village Family Practice collects health information from you and stores it in a chart and on a computer. This is your medical record. The medical record is the property of Village Family Practice, but the information in the medical record belongs to you. Village Family Practice protects the privacy of your health information. The law permits Village Family Practice to use or disclose your health information for the following purposes:

1. **Treatment:** The provision, coordination, or management of health care and related services by one or more health care providers, including the coordination or management of health care by a health care provider with a third party; consultation between health care providers relating to a patient; or the referral of a patient for health care from one health care provider to another.
2. **Payment:** A covered health care provider or health plan to obtain or provide reimbursement for the provision of health care; and to the individual to whom health care is provided and include, but are not limited to:

- a) Determinations of eligibility or coverage (including coordination of benefits or the determination of cost sharing amounts), and adjudication or subrogation or health benefit claims.
- b) Risk adjusting amounts due based on enrollee health status and demographic characteristics.
- c) Billing, claims management, collections activities, obtaining payment under a contract for reinsurance (including stop-loss insurance and excess of loss insurance) and related health card data processing.
- d) Review of health care services with respect to medical necessity, coverage under a health plan, appropriateness of care, or justification of charges.
- e) Utilization review activities, including pre-certification and preauthorization of services, concurrent and retrospective review of services.
- f) Disclosure to consumer reporting agencies of any of the following protected health information relating to collection of premiums or reimbursement:

Name and address	Account number
Date of birth	Name and address or health care provider and/or health plan
Social security number	Payment history

3. **Regular Health Care Operations:** The activities related to covered functions, and any of the following activities of an organized health care arrangement in which the covered entity participates:

- a) Conduction quality assessment and improvement activities, including outcomes evaluation and development of clinical guidelines, provided that the obtaining of generalizable knowledge is not the primary purpose of any studies resulting from such activities; population-based activities relating to improving health or reducing health care costs, protocol development, case management and care coordination, contacting of health care providers and patients with information about treatment alternatives; and related functions that do not include treatment.
- b) Reviewing the competence or qualifications of health care professionals, evaluating practitioner and provider performance, health plan performance, conducting training programs in which students, trainees, or practitioners in areas of health care learn under supervision to practice or improve their skills as health care providers, training of non-health care professionals, accreditation, certification, licensing, or credentialing activities.
- c) Underwriting, premium rating, and other activities relating to the creation, renewal or replacement or a contract or health insurance or health benefits, and ceding, securing, or placing a contract of reinsurance of risk relating to claims for health care (including stop loss insurance and excess of loss insurance).
- d) Conducting or arranging for medical review, legal services, and auditing functions, including fraud and abuse detections and compliance programs.
- e) Business planning and development, such as conducting cost management and planning-related analyses related to managing and operating the entity, including formulary development and administration, development or improvement of methods of payment or coverage policies.
- f) Management activities relating to implementation of and compliance.
- g) Customer service, including the provision of data analyses for policy holders, plan sponsors, or other customers, provided that protected health information is not disclosed to such a policy holder, plan sponsor or customer.
- h) Resolution of internal grievances.
- i) Due diligent in connection with the sale or transfer of assets to a potential successor in interest, if the potential successor in interest is a covered entity or, following completion of the sale or transfer.
- j) Consistent with the applicable requirements of creating de-identified health information, fundraising for the benefit of the covered entity, and marketing for which an individual authorization is not required.

4. Information provided to you.

5. **Directory:** We may list your name, where you are located in our facilities, your general medical condition and your religious affiliation in our directory. This information may be provided to members of the clergy. This information, except your religious affiliation, may be provided to other people who ask for you by name. If you do not want us to list this information in our directory and provide it to clergy and others, you must tell us that you object.
6. **Notification and communication with family:** We may disclose your health information to notify or assist in notifying a family member, your personal representative or another person responsible for your care about your location, your general condition or in the event of your death. If you are able and available to agree or object, we will give you the opportunity to object prior to making this notification. If you are unable or unavailable to agree or object, our health care professionals will use their best judgment in communication with your family and others.
7. **Required by law:** As required by law, we may disclose your health information.
8. **Public health:** As required by law we may disclose your health information to public health authorities for purposes related to: preventing or controlling disease, injury or disability; reporting child abuse or neglect; reporting domestic violence; reporting Food and Drug Administration problems with products and reactions to medications; and reporting disease or infection exposure.
9. **Health oversight activities:** We may disclose your health information to health agencies during the course of audits, investigations, inspections, licensure and other proceedings.
10. **Judicial and administrative proceedings:** We may disclose your health information in the course of any administrative or judicial proceeding.
11. **Law enforcement:** We may disclose your health information to a law enforcement official for purposes such as identifying or locating a suspect, fugitive, material witness or missing person, complying with a court order or subpoena and other law enforcement purpose.
12. **Deceased person information:** We may disclose your health information to coroner, medical examiners and funeral directors.
13. **Organ donations:** We may disclose your health information to organizations involved in procuring, banking, or transplanting organs or tissues.
14. **Research:** We may disclose your health information to researchers conducting research that has been approved by an Institutional Review Board or Village Family Practice's privacy board.
15. **Public safety:** We may disclose your health information to appropriate persons in order to prevent or lessen a serious and imminent treat to the health or safety of a particular person or general public.
16. **Specialized government functions:** We may disclose your health information for military, national security, prisoner and government benefits purposes.
17. **Worker's compensation:** We may disclose your health information as necessary to comply with worker's compensation laws/

II. When Village Family Practice May Not Use or Disclose Your Health Information

Except as described in the Notice of Privacy Practices, Village Family Practice will not use or disclose your health information without your written authorization. If you do authorize Village Family Practice to use or disclose your health information for another purpose you may revoke your authorization in writing at anytime.

III. Your Health Information Rights

The following rights are not absolute and are subject to some limitations and conditions.

1. You have the right to request restrictions on certain uses and disclosures of your health information. Village Family Practice is not required to agree to the restrictions you requested.
2. You have the right to receive your health information through a reasonable alternative means or at an alternative location. (Request in writing; specification of method; payment of method, as applicable).
3. You have the right to inspect and copy your health information.
4. You have a right request that Village Family Practice amend your health information that is incorrect or incomplete. Village Family Practice is not required to change your health information and will provide you with information about Village Family Practice's denial and how you can disagree with the denial.
5. You have a right to receive an accounting of disclosures of your health information made by Village Family Practice, except that Village Family Practice does not have to account for disclosures described in parts 1 (treatment), 2 (payment), 3 (health care operations), 4 (information provided to you), 5 (directory listings) and 16 (certain government functions) of section I of this Notice or Privacy Practices.

If you would like to have a more detailed explanation of these rights or if you would like to exercise on or more of these rights, contact Village Family Practice Privacy Officer.

IV. Changes to this notice of privacy practices

Village Family Practice reserves the right to amend this notice of privacy practices at any time in the future. Until such amendment is made, Village Family Practice is required by law to comply with this notice and will post all changes to this notice.

V. Complaints

Complaints about this Notice of Privacy Practices or how Village Family Practice handles your health information should be directed to the Village Family Practice Privacy Officer or Management. If you are not satisfied with the manner in which this office handles a complaint, you may submit a formal complaint to: Department of Health and Human Services

Office of Civil Rights Hubert H. Humphrey Bldg.
200 Independence AVE., S.W. Room 509f HHH Building
Washington, DC 20201