

Great Lakes Physician Practice, PC

NOTICE OF PRIVACY PRACTICES EFFECTIVE 9/23/2014

THIS NOTICE DESCRIBES HOW MEDICAL INFORMATION ABOUT YOU MAY BE USED AND DISCLOSED AND HOW YOU CAN GET ACCESS TO THIS INFORMATION.

PLEASE READ IT CAREFULLY.

In the course of your appointments with Great Lakes Physician Practice, PC (GLPP) healthcare providers, information about your care is created. The law calls this information Protected Health Information (PHI). GLPP is required by law to protect this information and may only disclose it under certain condition described below.

What is PHI? Protected Health Information (PHI) is any information in the medical record or designated record set that can be used to identify an individual and that was created, used, or disclosed in the course of providing a health care service such as diagnosis or treatment. Examples:

- Your doctor's notes on your visit
- Your lab results
- The services being billed to your health insurance

PHI may be used without your consent to provide treatment, obtain payment for services provided and conduct healthcare operations. Examples:

- *Treatment* – to a GLPP physician or for referral to another doctor
- *Obtain payment* – to verify treatment provided to you in order to receive reimbursement from an insurance company. *Exception* – If you request, GLPP must restrict disclosure of PHI relating to a service for which you have paid in full and disclosure of the PHI is not required by law.
- *Healthcare Operations* – to conduct internal quality assessment and improvement or contact you for an appointment reminder

Your healthcare information may also be released without consent or authorization for:

- Uses and disclosures required by law
- Uses and disclosures for public health activities – reporting births / death, communicable diseases, product recalls, proof of immunization
- Disclosures about victims of abuse, neglect or domestic violence
- Health oversight activities
- Judicial and administrative proceedings
- Law enforcement purposes
- Decedents
- Organ and / or tissue donation
- Research purposes within requirements of Federal law
- Avert a serious threat to your health or safety
- For specialized government functions
- Worker's compensation
- Inmates of a correctional institution or persons in the custody of law enforcement officials

Your PHI may be released ONLY with your written authorization (i) for marketing purposes or (ii) for disclosures which are a sale of PHI. Once given, your authorization can be revoked at any time but must be in writing. Other uses and disclosures not addressed in this Notice of Privacy Practices will be made only with your authorization.

You have the right to:

- Request restrictions on certain uses and disclosures of your PHI. However, GLPP may decline to accept your request
- NOTE: We must accept your request not to disclose PHI relating to services for which you have paid in full, unless disclosure is required by law.
- Receive confidential communications of PHI
- Inspect and copy your PHI, within restrictions specified in Federal law
- NOTE: All requests to inspect or amend must be submitted in writing to GLPP's Privacy Officer. You will receive a timely response. Law requires in no more than 30 days.
- Receive an accounting of where your PHI was disclosed by us
- Be notified following a breach of unsecured PHI

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- If you believe that your privacy rights have been violated, you may contact GLPP's HIPAA Privacy Officer: GLPP HIPAA Privacy Officer, 15 South Main Street, Suite 300, Jamestown, New York 14701 – (716) 488-1877
- There is NO penalty for filing a complaint
- You may also contact the local officer of the federal department responsible for enforcing HIPAA privacy: Regional Manager, Office for Civil Rights, U.S. Department of Health and Human Services
Jacob Javits Federal Building, 26 Federal Plaza, Suite 3312, New York, New York 10278 – (800) 368-1019

GLPP's Duties and Rights:

- We are required by law to maintain the privacy of your PHI, provide individuals with a written copy of our legal duties and privacy practices with respect to PHI (this Notice of Privacy Practices), and notify affected individuals if a breach of unsecured PHI occurs.
- We are required by law to abide by the terms of the NPP currently in effect.
- We may change privacy practices; any such change will be effective for all PHI whether created or received before or after the change.
- If this NPP is revised, the new version will be posted in a prominent location in our offices and copies of the revised NPP will be readily available.

GREAT LAKES PHYSICIAN PRACTICE, PC PRIVACY PROCEDURES

Privacy Policy: Our practice recognizes and respects the fact that the patient has a right to inspect and obtain a copy of his/her Protected Health Information (PHI).

Privacy Procedures to accomplish this Privacy Policy

- The Privacy Official will provide the front office staff with an original form for patients to complete when the patient desires to inspect and copy his/her PHI.
- The front office staff will photocopy and make available to patients the form to inspect and copy PHI.
- The front office staff will respond to patient's requests and questions concerning inspecting and copying their PHI. In addition, the front office staff will distribute the form to the patients upon their request.
- Once the patient completes the form, the front office staff shall forward the form to the Site Coordinator.
- Once the patient has submitted his/her request in writing (using the practice's form is an option), the front office staff must verify that the patient's signature matches his/her signature on file.
- The Site Coordinator must review the patient's request and respond to the patient within 30 days from the date of the request. The Site Coordinator needs to review the specific request with the patient's treating physician. If the request is controversial or requires additional time for review, GLPP's Privacy Official needs to be involved.
- The Site Coordinator, with the Site Physician's approval, should all agree to all reasonable requests. If access is denied, the Privacy Official must provide the patient with an explanation for the denial as well as a description of the patient's review appeal.
- When the patient has requested to inspect their PHI, and his/her request has been accepted, the Privacy Official or other authorized practice representative should accompany the patient to a private area to inspect his/her records and remain with the patient during inspection. After the patient inspects the record, the Privacy Official will note in the record the date and time of inspection, and whether the patient made any requests for amendments or changes to the record.
- When the patient's request to copy his/her PHI has been accepted, the front office staff should copy his/her record within 30 days and may charge up to 75 cents per page.