

**THE HEALTHCARE CENTER AT WEST MEADE PLACE
PRIVACY PRACTICES NOTICE**

**THIS NOTICE DESCRIBES HOW MEDICAL INFORMATION ABOUT
YOU MAY BE USED AND DISCLOSED AND HOW YOU
CAN GET ACCESS TO THIS INFORMATION
Effective 9-23-13**

PLEASE REVIEW IT CAREFULLY

If you have any questions about this notice, please contact the Center Administrator.

We understand that health information about you and your health is personal. We are committed to protecting the privacy of this information. We create a record of the care and services you receive at The HealthCare Center at West Meade Place. We need this record to provide you with quality care and to comply with certain legal requirements. This notice applies to all of your health information created and/or maintained by The HealthCare Center at West Meade Place, including all information that we receive from other health care providers.

OUR RESPONSIBILITIES:

We are required bylaw to:

Make sure the health information that identifies you is kept private.

Give you this notice of our legal duties and privacy practices with respect to health information about you, and

Follow the terms of the notice that is currently in effect.

We reserve the right to change our practices and to make the new provisions effective for all protected health information we maintain. Should our information practices change, we will inform you of the change of the public display of notice and provide the revised Notice on our website.

We will not use or disclose your health information without your authorization except as described in this notice.

HOW WE MAY USE AND DISCLOSE

HEALTH INFORMATION ABOUT YOU

FOR TREATMENT: We will use your health information to provide you with medical treatment and services. Unlimited access to health information will be granted to physicians involved in your care, including attending, alternate, physician extenders, consulting physicians, osteopaths, podiatrists and dentist. Direct care givers will be given unlimited access to your health information needed to perform their job responsibilities including any contracted direct care givers (i.e., contract therapists, wound care specialists, hospice, pharmacists, etc.) when such services are ordered by your attending physician.

Your health information will be provided to hospital and transport personnel to the extent needed to provide for continuity of care. This Center may contract with local schools to serve as clinical practice sites and students enrolled in such programs, under supervision of the instructor, will be given unlimited access as a direct care giver.

We will also provide your physician or a subsequent healthcare provider with copies of various reports that should assist him or her in treating you once you are discharged from this Center.

EXAMPLE: Your physician will write orders for *your* care in your record. We will use this information to order medications from the pharmacy, request ordered lab tests, and determined the main course of treatment that would work best for you.

FOR PAYMENT: Your health information will be provided to state agencies that are responsible for approving/certifying appropriateness of admission. Federally mandated minimum data sets are electronically transmitted to the state which are used to set payment rates for Medicare eligible patients as well as Medicaid rates in certain states. Your health information will be released to Medicare and Medicaid payers and private insurers in sufficient amount to justify payment for services billed. Should your account not be paid in a timely manner and it becomes necessary to turn your account over to a collection agency, we will release protected health information in the amounts necessary to collect the account and search for assets. Bookkeeping will have access to health information to the extent necessary to bill appropriate agencies for services rendered.

EXAMPLE: A bill might be sent to Medicare for services rendered. The information on or accompanying the bill will include information that identifies you, as well as your diagnosis, procedures, and supplies used.

FOR HEALTH CARE OPERATIONS: Your health information will routinely be used in the following health care operations: 1) Conducting quality assessments and performance improvement activities including outcomes evaluations and development of clinical guidelines; 2) Reviewing the competence or qualifications of health care professionals, evaluating practitioner 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 non-health care professionals, accreditation, certification, licensing or credentialing activities; 3) Conducting or arranging for medical review, legal services, and auditing functions including fraud and abuse detection and compliance programs; 4) Business planning and development, such as conducting cost-management and planning related analysis related to managing and operating the Center; 5) Business management and general administrative activities of the Center. Your health information will be routinely used by the following job classifications to the extent necessary to carry out their assigned functions; MDI Achieve Information Systems Analysts, Central Supply, Health Information Management,, Housekeeping, Laundry, and Maintenance partners within the Center; Beauty and Barber Shop partners.

EXAMPLE: MDI Achieve Analysts may need to access your health information to determine why the computer program is not functioning appropriately.

BUSINESS ASSOCIATES: There are some services provided in our health center through contracts with business associates who carry out certain services on our behalf. This includes, but not limited to, auditing, legal services, and consulting services. These outside individuals or companies are called “business associates” and they contract with us to keep any protected health information received from us secure and confidential in the same way we do. Our business associates can create, receive, maintain, or transmit protected health information on our behalf. These business associates

may contract with subcontractors to assist in carrying out certain services and they are also held legally responsible for keeping any protected health information secure and confidential.

DIRECTORY: Unless you notify us that you object, we will use your name, location in the facility, and religious affiliation for directory purposes. This information may be provided to members of the clergy and, except for religious affiliation, to other people who ask for you by name. Other ways in which we will use your name include: we will post your name beside the door to your room. Your name will be used on the outside of the binder which houses your paper medical record.

We typically publish names and birth dates (month and day) in the Center newsletter and post the same on the activity calendar. You have the right to request that your protected health information not be used for any one or all of the above purposes by completing a “Request for Restriction to Use or Disclosure of Health Information” form. You may request this form from our Centers Privacy Officer.

NOTIFICATION: We may use or disclose information to notify or assist in notifying a family member, personal representative, or another person responsible for your care, your location, and general condition.

COMMUNICATION WITH FAMILY: Health professionals, using their best judgment, may disclose to a family member, other relative, close personal friend or any other person you identify, health information relevant to that person’s involvement in your care or payment for health care of a deceased individual if not inconsistent with the prior expressed preferences of the individual that are known to this Center. You can request that we not discuss your health information with specific family members by notifying us in writing. A form will be provided upon your request.

RESEARCH: We may disclose information to researchers when their research has been approved by an institutional review board that has reviewed the research proposal and established protocols to ensure the privacy of your health information. Otherwise your consent to participate in research is required.

TO STOP A SERIOUS THREAT: We may share your medical information to prevent a serious and urgent threat to the health and safety of you or someone else. For example, a threat to harm another person may be reported to the police.

MEDICAL EXAMINERS, CORONERS, AND FUNERAL DIRECTORS: We may disclose health information to medical examiners, coroners, and funeral directors consistent with applicable law to carry out their functions.

ORGAN DONATION ORGANIZATIONS: Consistent with applicable law, we may disclose health information to organ procurement organizations or other entities engaged in the procurement, banking, or transplantation of organs for the purpose of tissue donation and transplant.

MARKETING: The HealthCare Center at West Meade Place does not sell or use patient lists for marketing purposes. However, during the course of your treatment, for coordination of care purposes, we may recommend alternate treatment, therapies, health care providers or settings of care to you.

FUND RAISING: We may use your protected health information such as your name, address, phone number, dates you received services, your treating physician, outcome information, and health insurance status to contact you to try to raise money for this Center. You have the right to **opt out** and ask not to be contacted for fundraising. If we contact you, we will tell you how to prevent future contact, if you wish.

FOOD AND DRUG ADMINISTRATION (FDA): We may disclose to the FDA health information relative to adverse events with respect to food, supplements, product and product defects, or post marketing surveillance information to enable product recalls, repairs, or replacement.

WORKERS' COMPENSATION: We may disclose health information to the extent authorized by and to the extent necessary to comply with laws relating to workers compensation or other similar programs established by law that includes a written request by your employer, worker's compensation insurer, or their representative.

PUBLIC HEALTH: As required by law, we may disclose your health information to public health or legal authorities charged with preventing or controlling disease, injury, or disability.

LAW ENFORCEMENT: We may disclose health information for law enforcement purposes required by law or in response to a valid subpoena. Federal law makes provision for your health information to be released to appropriate health oversight agency, public health authority or attorney, provided that a work force member or business associate or their subcontractor believes in good faith that we have engaged in unlawful conduct or have otherwise violated professional or clinical standards and are potentially endangered one or more patients, workers, or the public.

YOUR HEALTH INFORMATION RIGHTS

Although your health record is the physical property of The HealthCare Center at West Meade Place, the information belongs to you. You have the following rights regarding health information we maintain about you:

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 health and billing information, but does not include psychotherapy notes.

To inspect and copy health information that may be used to make decisions about you, you may request access to your health information by contacting the Center's Health Information Department. If you request a copy of the information, we may charge a fee for the costs of copying, mailing or other supplies associated with your request consistent with federal and state law. You have the right to receive your medical information in electronic form by e-mail (limited amount) or on a CD. You also have the right to ask that your medical information be sent to another party giving their complete address with your signature and date applied to the request. We may deny your request in certain very limited circumstances. If you are denied access to health information, you may request that the denial be reviewed. Another licensed health care professional chosen by the Center will review your request and the denial. The person conducting the review will not be the person who denied your request. We will abide by the outcome of the review.

RIGHT TO CONFIDENTIAL COMMUNICATIONS: You have the right to receive communications of protected health information from us in a confidential manner. At your request, any conversations regarding your protected health information can be moved from your semiprivate room to a private area of the Center.

RIGHT TO AMEND: If you feel that the health information we have about you is incorrect or incomplete, you may ask us to amend the information. Ask us how to do this. We may say "no" to our request, but we'll tell you why in writing within 60 days of your request.

RIGHT TO AN ACCOUNTING OF DISCLOSURES: You can ask for a list (accounting) of the times we've shared your health information for six years prior to the date you ask, who we shared it with, and why.

We will include all the disclosures except for those about treatment, payment and health care operations, and certain other disclosures (such as any you asked us to make). We'll provide one accounting a year for free but will charge a reasonable, cost-based fee if you ask for another one within 12 months.

RIGHT TO NOTICE IN CASE OF A BREACH: You have a right to know if your information has been breached (not treated according to our rules). We will follow what the privacy laws require to let you know if your information has been shared in error.

RIGHT TO REQUEST RESTRICTIONS: You have the right to request in writing that the Center restrict the use of your health information for treatment, payment and operations, as well as restrict the disclosure of specific information to someone involved in your care or the payment of your care, like a family member or friend. THE CENTER IS NOT OBLIGED TO AGREE TO EVERY RESTRICTION REQUESTED, but is obliged to abide by any restriction that is agreed upon. If we do agree, we will comply with your request unless the information is needed to provide you with emergency treatment. To request a restriction, you must make your request in writing to any Center Partner. We will provide a form upon request.

RIGHT TO LIMIT SHARING OF INFORMATION WITH HEALTH PLANS: If you paid in full for your services, you have the right to withhold or limit the information that is shared with your health plan or insurer.

RIGHT TO A PAPER or ELECTRONIC COPY OF THIS NOTICE:

You have the right to a paper or electronic copy of this notice at anytime. To obtain a copy of this notice, you may ask any Center partner who will help you obtain a copy or you can go the Center's website at www.westmeadeplice.com. Click on the words "About Us" at the top of the page, scroll down and click on "Privacy Information", and then click on the [Notice of Privacy Practices](#) link to view or print a copy.

OTHER USES OF HEALTH INFORMATION

Other uses and disclosures of medical information not covered by this notice or the laws that apply to us will be made only with your written authorization. If you provide us with authorization to use or disclose health information about you, you may revoke that authorization, in writing, at anytime. If you revoke your permission, we will no longer use or disclose health information about you for reasons covered by your written authorization. You understand that we are unable to take back any disclosures we have already made with your permission, and that we are required to retain our records of the care that we provided you. Likewise, we would not use your information for fundraising, marketing, or sell your information without your permission.

COMPLAINTS

If you believe your privacy rights have been violated, you may file a complaint with either the Center Ombudsman or the Center Administrator. If the matter is not resolved to your satisfaction, you may also file a complaint with The HealthCare Center at West Meade Place's Privacy Officer by phone at (615)352-3430 or by mail at the following address:

The HealthCare Center at West Meade Place
1000 St. Luke Dr.
Nashville, TN 37205

You also have the right to file a complaint with the Secretary of Health and Human Services at the following address: (You will not be treated differently for filing a complaint.)

Secretary of Health and Human Services
U.S. Department of Health and Human Services
200 Independence Avenue, SW Washington, DC 20201
Telephone No. 1-877-696-6775 or visit www.hhs.gov/ocr/privacy/hipaa/complaints/

REVISED DATE 09/17/2013