

Hosparus Inc.
The Community Hospices of Louisville, Southern Indiana and Central Kentucky

HOSPARUS BRIDGES COUNSELING CENTER **NOTICE OF PRIVACY PRACTICES**

This notice describes how information related to bereavement counseling, obtained during your relationship with Hosparus Bridges Counseling Center (HBCC) may be used and disclosed and how you can get access to this information. Please review it carefully.

USE AND DISCLOSURE OF HEALTH INFORMATION

HBCC may use your health information for purposes of providing you care/services and/or conducting health care operations. HBCC will have you acknowledge that you have received the Notice of Privacy Practice. Your health information may be used or disclosed for purposes outlined below. HBCC has established policies to guard against unnecessary disclosure of your health information.

The following is a summary of the circumstances and purposes for which your health information may be used and disclosed.

To Provide Care, Treatment and Services. HBCC may use your health information to coordinate care/service within HBCC and with others involved in your care or service, such as, members of the interdisciplinary team and other health care professionals who have agreed to assist HBCC in coordinating care/service. For example, should you request that your physician contact HBCC to get information related to your symptoms in order to prescribe appropriate medications. HBCC may also disclose your health information to individuals outside of HBCC who are involved in your care. These individuals may include, but are not limited to, family members, clergy whom you have designated, or other health care professionals who have a clear and defined need to know. HBCC will not disclose specific confidences or privileged information disclosed during counseling or related services, unless required to do so by law.

To Conduct Health Care Operations. HBCC may use and disclose health care information for its own operation in order to facilitate the function of HBCC and to provide quality care/services to HBCC patients/families/clients. Healthcare operations includes, but is not limited to such activities as:

- Quality and compliance activities. For example, HBCC may use your health information to evaluate staff performance or evaluate how to more effectively serve patients/families/clients.
- Activities designed to improve health or reduce health care costs.
- Procedure development, case management and care coordination. For example, HBCC may use your health information to contact you as a reminder regarding a visit to or an appointment with you.
- Memorial Services. For example, Hosparus may publish hospice patients' names in Memorial Service bulletins.
- Training programs in which students, trainees or practitioners learn under supervision.
- Accreditation, certification, licensing or credentialing activities.
- Business planning and development
- Business management and general administrative activities of HBCC.

To Obtain Payment. While payment may not be required for the services you receive from HBCC, if you received services that require a fee and request payment by third parties, HBCC may include your health information in invoices to collect payment. For example, HBCC may be required by your Employee Assistance Program or health insurer to provide information regarding your health care status so that the insurer will reimburse you or HBCC. HBCC may also need to obtain prior approval from your insurer and may need to explain to the insurer your need for the care or services

Federal privacy rules allow HBCC to use or disclose your health information without your authorization for a number of reasons.

When Legally Required. HBCC discloses your health information when it is required to do so by any Federal, State or local law.

When There Are Risks to Public Health. HBCC may disclose health information for public activities and purposes in order:

- To prevent or control disease, injury or disability, report disease, injury, vital events such as birth or death and the conduct of public health surveillance, investigations and interventions.
- To report adverse events that may be required for compliance with the requirements Governmental or Regulatory Agencies.
- To notify a person who has been exposed to a communicable disease or who may be at risk of contracting or spreading a disease.
- To inform an employer about an individual who is a member of the workforce as legally required.

To Report Abuse, Neglect Or Domestic Violence. HBCC is required to notify government authorities if it believes a patient/family member/client is the victim of abuse, neglect or domestic violence. HBCC makes this disclosure only when specifically required or authorized by law or when the patient/family member/client agrees to the disclosure.

To Conduct Health Oversight Activities. HBCC may disclose health information to a health oversight agency for activities including audits, civil administrative or criminal investigations, inspections, licensure or disciplinary action. HBCC, however, may not disclose your health information if you are the subject of an investigation and your health information is not directly related to your receipt of health care or public benefits.

In Connection With Judicial And Administrative Proceedings. HBCC may disclose health information in the course of any judicial or administrative proceeding in response to an order of a court or administrative tribunal as expressly authorized by such order or in response to a subpoena, discovery request or other lawful process, but only when HBCC makes reasonable efforts to either notify you about the request or to obtain an order protecting your health information.

For Law Enforcement Purposes. HBCC may disclose health information to a law enforcement official for law enforcement purposes as follows:

- As required by law for reporting of certain types of wounds or other physical injuries pursuant to the court order, warrant, subpoena or summons or similar process.
- For the purpose of identifying or locating a suspect, fugitive, material witness or missing person.
- Under certain limited circumstances, when you are the victim of a crime.
- To a law enforcement official if HBCC has a suspicion that a death was the result of criminal conduct including criminal conduct of HBCC.
- In an emergency in order to report a crime.

For Research Purposes. HBCC may, under very select circumstances, use health information for research. Before HBCC discloses any health information for such research purposes, the project is subject to an extensive approval process and HBCC asks permission to grant a researcher access to individually identifiable health information.

In the Event Of A Serious Threat To Health Or Safety. HBCC may, consistent with applicable law and ethical standards of conduct, disclose health information if it, in good faith, believes that such disclosure is necessary to prevent or lessen a serious and imminent threat to health or safety.

For Specified Government Functions. In certain circumstance, the Federal regulations authorize HBCC to use or disclose health information to facilitate specified government functions relating to military and veterans, national security and intelligence activities, protective services for the President and others, medical suitability determinations and inmates and law enforcement custody.

For Worker's Compensation. HBCC may release health information for worker's compensation or similar programs.

AUTHORIZATION TO USE OR DISCLOSE HEALTH INFORMATION

Other than stated above, HBCC will not disclose health information without your written authorization. If you or your representative authorizes HBCC to use or disclose your health information, you may revoke that authorization in writing at any time.

For Fundraising and Marketing Activities. HBCC will obtain prior written authorization to use Protected Health Information (PHI) for marketing purposes except for a face-to face encounter or a communication involving a promotional gift of nominal value. The Foundation will define marketing. HBCC will not sell lists of patients/families/clients to third parties or disclose the PHI to a third party for the marketing purposes of the third party, without your authorization. HBCC may use information about you including your name, address, phone number and the dates you received care/service in order to contact you or your family to raise money for HBCC. HBCC may also release this information to a related foundation. If you do not want HBCC to contact you or your family, notify the Senior Manager of Communications of Hosparus (1-502-456-6200 or 1-800-264-0521) and indicate that you do not wish to be contacted.

YOUR RIGHTS WITH RESPECT TO YOUR HEALTH INFORMATION

You have the following rights regarding your health information that HBCC maintains:

- **Right to request restrictions.** You may request restrictions on certain uses and disclosures of your health information. You have the right to request a limit on HBCC's disclosure of your health information to someone who is involved in your care or the payment of your care/service. However, HBCC is not required to agree to your request. If you wish to make a request for restrictions, please contact the Quality and Compliance Coordinator (1-502-456-6200 or 1-800-264-0521).
- **Right to receive confidential communications.** You have the right to request that HBCC communicate with you in a certain way. For example, you may ask that HBCC only conduct communications pertaining to your health information with you privately with no other family members present. If you wish to receive confidential communications, please contact the Quality and Compliance Coordinator (1-502-456-6200 or 1-800-264-0521). HBCC does not request that you provide any reasons for your request and attempts to honor your reasonable requests for confidential communications.

- **Right to inspect and copy your health information.** You have the right to inspect and copy your health information, including billing records. A request to inspect and copy records containing your health information may be made to the Quality and Compliance Coordinator (1-502-456-6200 or 1-800-264-0521). If you request a copy of your health information, HBCC may charge a reasonable fee for copying and assembling costs associated with your request.
- **Right to amend health care information.** If you or your representative believes that your health information records are incorrect or incomplete, you may request that HBCC amend the records. That request may be made as long as HBCC maintains the information. A request for an amendment of records must be made in writing to the Quality and Compliance Coordinator, 3532 Ephraim McDowell Drive, Louisville, Kentucky 40205-3224. HBCC may deny the request if it is not in writing or does not include a reason for the amendment. The request also may be denied if your health information records were not created by HBCC, if the records you are requesting are not part of HBCC's records, if the health information you wish to amend is not part of the health information you or your representative are permitted to inspect and copy, or if, in the opinion of HBCC, the records containing your health information are accurate and complete.
- **Right to an accounting.** You or your representative have the right to request an accounting of disclosures of your health information made by HBCC for any reason other than for care/services (aka) treatment, payment or health operations. The request for an accounting must be made in writing to the Quality and Compliance Coordinator, 3532 Ephraim McDowell Drive, Louisville, Kentucky 40205-3224. The request should specify the time period for the accounting starting on April 14, 2003. Accounting requests may not be made for periods of time in excess of six years. HBCC provides the first accounting you request during any 12-month period without charge. Subsequent accounting requests may be subject to a reasonable cost-based fee.
- **Right to a paper copy of this notice.** You or your representative has a right to a separate paper copy of this Notice at any time even if you or your representative have received this Notice previously. To obtain a separate paper copy, please contact the Quality and Compliance Coordinator (1-502-456-6200 or 1-800-264-0521). You may also obtain a copy of the current version of HBCC's Notice of privacy practices at its website, www.hospices.org.

DUTIES OF HOSPARUS BRIDGES COUNSELING CENTER

HBCC is required by law to maintain the privacy of your health information and to provide to you and your representative this Notice of its duties and privacy practices. HBCC is required to abide by terms of this Notice as may be amended from time to time. HBCC reserves the right to change the terms of its Notice and to make the new Notice provisions effective for all health information that it maintains. If HBCC changes its Notice, HBCC provides a copy of the revised Notice to you or your appointed representative. You or your personal representative have the right to express complaints to HBCC and to the Secretary of Health and Human Services if you or your representative believe that your privacy rights have been violated. Any complaints to HBCC should be made in writing to the Quality and Compliance Coordinator, 3532 Ephraim McDowell Drive, Louisville, Kentucky 40205-3224. Hosparus encourages you to express any concerns you may have regarding the privacy of your information. You will not be retaliated against in any way for filing a complaint.

CONTACT PERSON

HBCC's contact person for all issues regarding patient privacy and your rights under the Federal privacy standards is the Quality and Compliance Coordinator, 3532 Ephraim McDowell Drive, Louisville, Kentucky 40205-3224, 1-502-456-6200.

PLEASE CALL IF YOU HAVE ANY QUESTIONS REGARDING THIS NOTICE.

REVISION DATES:

October 2007, May 2008.