Notice of Meritas Health Corporation HIPAA Privacy Practices

**USE AND DISCLOSURE OF HEALTH INFORMATION**

Meritas Health Corporation [“Meritas”] may use your health information, information that constitutes protected health information as defined in the Privacy Rule of the Administrative Simplification provisions of the Health Insurance Portability and Accountability Act of 1996, for purposes of providing you treatment, obtaining payment for your care and conducting health care operations. Meritas Health has established policies to guard against unnecessary disclosure of your health information.

**THE FOLLOWING IS A SUMMARY OF THE CIRCUMSTANCES UNDER WHICH AND PURPOSES FOR WHICH YOUR HEALTH INFORMATION MAY BE USED AND DISCLOSED:**

**To Provide Treatment.** Meritas Health may use your health information to coordinate care within Meritas Health and with others involved in your care, such as your attending physician, members of Meritas Health interdisciplinary team and other health care professionals who have agreed to assist Meritas Health in coordinating care. For example, physicians involved in your care will need information about your symptoms in order to prescribe appropriate medications. Meritas Health also may disclose your health care information to individuals outside of Meritas Health involved in your care including family members, clergy who you have designated, pharmacists, suppliers of medical equipment or other health care professionals.

**To Obtain Payment.** Meritas Health may include your health information in invoices to collect payment from third parties for the care you receive from Meritas Health. For example, Meritas Health may be required by your health insurer to provide information regarding your health care status so that the insurer will reimburse you or Meritas Health. Meritas Health also may need to obtain prior approval from your insurer and may need to explain to the insurer your need for Meritas Health care and the services that will be provided to you.

**To Conduct Health Care Operations.** Meritas Health may use and disclose health information for its own operations in order to facilitate the function of Meritas Health and as necessary to provide quality care to all of Meritas Health’s patients. Health care operations include such activities as:

- Quality assessment and improvement activities.
- Activities designed to improve health or reduce health care costs.
- Protocol development, case management and care coordination.
- Contacting health care providers and patients with information about treatment alternatives and other related functions that do not include treatment.
- Professional review and performance evaluation.
- Training programs including those in which students, trainees or practitioners in health care learn under supervision.
- Training of non-health care professionals.
- Accreditation, certification, licensing or credentialing activities.
- Review and auditing, including compliance reviews, medical reviews, legal services and compliance programs.
- Business planning and development including cost management and planning related analyses and formulary development.
- Business management and general administrative activities of Meritas Health.
- Fundraising for the benefit of Meritas Health.

For example Meritas Health may use your health information to evaluate its staff performance, combine your health information with other Meritas Health patients in evaluating how to more effectively serve all Meritas Health patients, disclose your health information to Meritas Health staff and contracted personnel for training purposes, use your health information to contact you as a reminder regarding a visit to you, or contact you as part of general fundraising and community information mailings (unless you tell us you do not want to be contacted).

For Health Information Exchange. Meritas Health participates in a Health Information Exchange (HIE). A HIE allows health care professionals and patients to access and securely share a patient’s vital medical information electronically. Your PHI may be disclosed to the HIE and to other health care providers that participate in the HIE.

For Fundraising Activities. Meritas Health may use information about you including your name, address, phone number and the dates you received care in order to contact you or your family to raise money for Meritas Health. If you do not want Meritas Health to contact you or your family, notify the applicable Clinic Manager and indicate that you do not wish to be contacted.

For Appointment Reminders. Meritas Health may use and disclose your health information to contact you as a reminder that you have an appointment.

For Treatment Alternatives. Meritas Health may use and disclose your health information to tell you about or recommend possible treatment options or alternatives that may be of interest to you.

THE FOLLOWING IS A SUMMARY OF THE CIRCUMSTANCES UNDER WHICH AND PURPOSES FOR WHICH YOUR HEALTH INFORMATION MAY ALSO BE USED AND DISCLOSED.

When Legally Required. Meritas Health will disclose your health information when it is required to do so by any Federal, State or local law.

When There Are Risks to Public Health. Meritas Health may disclose your 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.
• Report adverse events, product defects, to track products or enable product recalls, repairs and replacements and to conduct post-marketing surveillance and compliance with requirements of the Food and Drug Administration.
• Notify a person who has been exposed to a communicable disease or who may be at risk of contracting or spreading a disease.
• Notify an employer about an individual who is a member of the workforce as legally required.

**To Report Abuse, Neglect Or Domestic Violence.** Meritas Health is allowed to notify government authorities if Meritas Health believes a patient is the victim of abuse, neglect or domestic violence. Meritas Health will make this disclosure only when specifically required or authorized by law or when the patient agrees to the disclosure.

**To Conduct Health Oversight Activities.** Meritas Health may disclose your health information to a health oversight agencies for activities including audits, civil administrative or criminal investigations, inspections, licensure or disciplinary action. Meritas Health, 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.** Meritas Health may disclose your 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 Meritas Health makes reasonable efforts to either notify you about the request or to obtain an order protecting your health information.

**For Law Enforcement Purposes.** As permitted or required by State law, Meritas Health may disclose your health information to a law enforcement official for certain 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 Meritas Health has a suspicion that your death was the result of criminal conduct including criminal conduct at Meritas Health.
  • In an emergency in order to report a crime.

**To Coroners And Medical Examiners.** Meritas Health may disclose your health information to coroners and medical examiners for purposes of determining your cause of death or for other duties, as authorized by law.

**To Funeral Directors.** Meritas Health may disclose your health information to funeral directors consistent with applicable law and if necessary, to carry out their duties with respect to your funeral arrangements. If necessary to carry out their duties, Meritas Health may disclose your health information prior to and in reasonable anticipation of your death.

**For Organ, Eye Or Tissue Donation.** Meritas Health may use or disclose your health information to organ procurement organizations or other entities engaged in the procurement,
banking or transplantation of organs, eyes or tissue for the purpose of facilitating the donation and transplantation.

**For Research Purposes.** Meritas Health may, under very select circumstances, use your health information for research. Before Meritas Health discloses any of your health information for such research purposes, the project will be subject to an extensive approval process.

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

**For Specified Government Functions.** In certain circumstances, the Federal regulations authorize Meritas Health to use or disclose your 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.** Meritas Health may release your health information for worker's compensation or similar programs.

**AUTHORIZATION TO USE OR DISCLOSE HEALTH INFORMATION**

Other than is stated above, Meritas Health will not disclose your health information other than with your written authorization. If you or your representative authorizes Meritas Health to use or disclose your health information, you may revoke that authorization in writing at any time.

**YOUR RIGHTS WITH RESPECT TO YOUR HEALTH INFORMATION**

You have the following rights regarding your health information that Meritas Health 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 Meritas Health’s disclosure of your health information to someone who is involved in your care or the payment of your care. However, Meritas Health is not required to agree to your request. If you wish to make a request for restrictions, please contact the applicable **Meritas Health Clinic Manager**.

- **Right to receive confidential communications.** You have the right to request that Meritas Health communicate with you in a certain way. For example, you may ask that Meritas Health 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 applicable **Meritas Health Clinic Manager**. Meritas Health will not request that you provide any reasons for your request and will attempt 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 applicable **Meritas Health Clinic Manager**.
Clinic Manager. If you request a copy of your health information, Meritas Health may charge a reasonable fee for copying and assembling costs associated with your request.

- **Right to amend health care information.** You and your representative have the right to request that Meritas Health amend your records, if you believe that your health information is incorrect or incomplete. That request may be made as long as the information is maintained by Meritas Health. A request for an amendment of records must be made in writing to the applicable Meritas Health Clinic manager. Meritas Health 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 Meritas Health, if the records you are requesting are not part of Meritas Health’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 Meritas Health, 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 Meritas Health for certain reasons, including reasons related to public purposes authorized by law and certain research. The request for an accounting must be made in writing to the applicable Meritas Health Clinic Manager. The request should specify the time period for the accounting starting on or after April 14, 2003. Accounting requests may not be made for periods of time in excess of six (6) years. Meritas Health would provide 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 and your representative have 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 applicable Meritas Health Clinic Manager.

**DUTIES OF MERITAS HEALTH**

Meritas Health 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. Meritas Health is required to abide by the terms of this Notice as may be amended from time to time. Meritas Health 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 Meritas Health changes its Notice, Meritas Health will provide a copy of the revised Notice to you or your appointed representative. You or your personal representative have the right to express complaints to Meritas Health and to the Secretary of DHHS if you or your representative believe that your privacy rights have been violated. Any complaints to Meritas Health should be made in writing to the Meritas Health Compliance Manager at the address listed below. Meritas 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

In addition to the Meritas Health Clinic Managers, Meritas Health has designated the *Meritas Compliance Manager* as its representative for all issues regarding patient privacy and your rights under the Federal privacy standards.

Compliance Manager
Meritas Health Corporation
2700 Clay Edwards Drive
Suite 240
North Kansas City, MO 64116
(816) 691-1686

EFFECTIVE DATE

This Notice is effective September 15, 2013

This Notice was updated February 14, 2014