



NOTICE OF PRIVACY PRACTICES

Effective Date: 4/1/03
Version 40103.1 Hospital

THIS NOTICE DESCRIBES HOW INDIVIDUALLY IDENTIFIABLE INFORMATION ABOUT YOU WILL BE USED AND DISCLOSED AND HOW YOU CAN GET ACCESS TO THIS INFORMATION. PLEASE REVIEW IT CAREFULLY.

Mount Carmel understands that your information is highly personal and Mount Carmel is committed to safeguarding your protected health information. Please read this Notice of Privacy Practices thoroughly.

Mount Carmel is required by law to maintain the privacy of individually identifiable patient health information. This information is “protected health information” and is referred to in this Notice as “PHI” to provide you with an explanation of how we handle your information. We will only use or disclose your PHI as permitted or required by applicable state or federal law. Mount Carmel can help you understand our privacy practices and your rights.

PERMITTED USES AND DISCLOSURES OF YOUR HEALTH INFORMATION:

Treatment: Mount Carmel will use and disclose your PHI to those who have a legitimate need for such information in the provision and coordination of your health care which may include physicians, nurses, technicians, students or other health care providers. This information is provided to carry out treatment functions at Mount Carmel, which includes consultations or referrals with other providers or agencies. PHI may be used or disclosed to obtain X-rays, laboratory work, prescriptions or other ancillary services related to your treatment.

Treatment Alternatives and Health Promotion Activities: Mount Carmel may use and disclose your PHI to inform you of, and assist you in, identifying and obtaining resources, or recommend possible treatment options, alternatives, or other health related benefits and services that will be of interest to you. The communication will explain how the product or service relates to your well being and can improve your health. Mount Carmel may use your name and address to send you newsletters or general communications. These materials are sent only to persons who are on a list that Mount Carmel purchases from an outside vendor or from the database of donors and not from patient information Mount Carmel collects unless you provide your PHI on our website.

After Discharge: Mount Carmel may also disclose your medical information to providers of health care services outside Mount Carmel who will be involved in your medical care after discharge or to others such as family members who are involved in the payment of the services that you have received.

Payment: Mount Carmel will use and disclose PHI about you for our payment purposes to insurance companies and companies that we engage in obtaining payment for care for items such as: determining coverage, eligibility, billing, and reimbursement. Mount Carmel may provide limited information for the billing purposes of other providers involved in your medical care, such as emergency medical services staff if you were brought in by their ambulance service.

Health Care Operations: Mount Carmel will use and disclose your PHI during routine health care operations including quality of care assessment and improvement activities; utilization review; activities to coordinate your care; legal, regulatory, accreditation and licensure activities; reviewing the performance or qualifications of health care providers for credentialing and evaluation purposes; conducting medical and nursing training and education programs; and medical review.

Appointment Reminders: Mount Carmel may use and disclose PHI to contact you as a reminder that you have an appointment for treatment or medical care at Mount Carmel.

Mount Carmel Directory: Unless you request a restriction or limitation, Mount Carmel will include certain limited information about you in a Mount Carmel Directory while you are a patient at Mount Carmel. This information includes your name, location and general condition. In the event you are incapacitated, or in an emergency, Mount Carmel will restrict or disclose your PHI based on professional judgement as to what would be in your best interest. If you choose not to be in the directory, we cannot inform visitors of your presence, or direct them to your location or update them on your general condition. This would include persons delivering flowers and clergy members.

Family and Friends: Mount Carmel may disclose PHI about you to a friend or family member who is involved in your medical care or to someone who helps you pay for your care. Mount Carmel may disclose your PHI for notification purposes, for example if your condition changes during your care. You can request a limitation or restriction on the disclosure of your PHI for some or all of your friends or family.

Spiritual Care and Chaplaincy Services: Mount Carmel is a Catholic sponsored health care provider. Spiritual care providers (chaplains) are members of our care staff, and will use your PHI to provide health care services to you.

Unless you request a restriction or limitation, your religious affiliation, name, location and general condition can be given to a non-hospital clergyperson, such as a priest or rabbi, even if they don't ask for you by name. The clergyperson may be unknown to you or represent a religious tradition different from yours.

Disaster Relief: Unless you request a restriction or limitation, we may disclose your medical information to a public or private entity authorized by law or by charter to assist in disaster relief efforts.

Inmates: If you are an inmate of a correctional institute or under the custody of a law enforcement officer, Mount Carmel will release your PHI to the correctional institute or law enforcement official.

Law Enforcement Purposes: Mount Carmel will disclose your PHI for law enforcement purposes, such as responding to a court order or subpoena, identifying a suspect or a missing person, or providing information about a crime victim or criminal conduct.

Required by Law: Mount Carmel will disclose PHI about you when required to do so by federal, state or local law. Such examples could be for the purposes of reporting of infectious diseases, neglect and abuse as required by law. Mount Carmel is also required to collect and/or provide information for judicial and administrative proceedings, and specialized governmental functions, to process Worker's Compensation claims, for vital statistics purposes, and to health oversight agencies. Ohio law offers greater protections which are addressed in the following statutes governing specific entities or medical conditions: hospitals, insurance records, and mental health records. All of Ohio's state laws regarding its consent requirement continue to apply. State law also allows the disclosure of PHI regarding the following specific conditions: anatomical gifts, cancer registry, genetic information, HIV / AIDS testing, long-term care residents, mental illness and mental retardation. Mount Carmel will abide by the most stringent state and federal laws.

FDA Regulated Products: Mount Carmel will use or disclose your PHI for activities related to the safety or effectiveness of FDA-regulated products or activities. This information is collected and reported to track and facilitate product recalls and adverse events. Any patient receiving a medical device subject to FDA tracking requirements may refuse to disclose identifying information.

Coroners, Medical Examiners, Funeral Directors: Mount Carmel will release, if necessary, your PHI to a coroner, funeral director, or medical examiner.

Organ Procurement: Mount Carmel will release PHI to an organ procurement organization or entity for organ, eye, or tissue donation purposes.

Health or Safety: Mount Carmel will use and disclose PHI to avert a serious threat to the health and safety of a person or the public.

Marketing/Fundraising: Mount Carmel does not share your PHI with companies that sell health care products or services, such as drug companies. Mount Carmel does maintain a database of individuals who have donated to Mount Carmel.

Research: Mount Carmel may use or disclose your PHI as part of research that includes providing you with treatment. For example, if you are part of a research study that includes treatment, Mount Carmel may require that you sign an authorization to allow the researchers to use or disclose your PHI for this research. Those research studies that do not require your authorization to disclose your information must go through a special approval process.

Other Uses: Any other uses or disclosures will be made only with your written authorization.

PATIENT HEALTH INFORMATION RIGHTS:

Although all records concerning your hospitalization and treatment obtained at Mount Carmel are property of Mount Carmel, you have the following rights concerning your PHI:

Right to Confidential Communications: You have the right to receive confidential communications of your PHI by alternative means or at alternative locations. For example, you may request that Mount Carmel only contact you at work or by mail.

Right to Request Restrictions: You have the right to request restrictions on certain uses and disclosures of your PHI:

- To carry out treatment, payment or health care operations functions; or
- To family members, relatives, close personal friends or other individuals involved in your care.

Mount Carmel will consider your request, but is not required to agree to your requested restrictions.

Right to Inspect and Copy: With some exceptions you have the right to inspect and copy information about your PHI as long as we maintain the information. In certain limited circumstances, Mount Carmel may be required to deny your request. Copying requires that you pay a reasonable copying charge.

Right to Amend: With some exceptions you have the right to request an amendment of your PHI for as long as Mount Carmel maintains the information.

Right to an Accounting: With some exceptions you have a right to receive an accounting of certain disclosures of your PHI that Mount Carmel has made.

Right to Receive a Copy of this Notice: You have the right to receive a paper copy of this Notice of Privacy Practices, upon request.

SHARING AND JOINT USE OF YOUR HEALTH INFORMATION:

In the course of providing care to you and in furthering Mount Carmel's mission to improve the health of the community, Mount Carmel will share your PHI with other organizations, as described below, who have agreed to abide by the terms described in this Notice.

Membership in Trinity Health: Mount Carmel and Trinity Health (our parent corporation and its respective members, in a Catholic healthcare system with facilities in seven states) participate together in an organized health care arrangement for utilization review and quality assessment activities with respect to this information. Members of Trinity Health also use your PHI for treatment, payment to Mount Carmel and/or for the health care operations permitted by law with respect to our mutual patients. Trinity Health will also abide by the terms of Trinity's Notice of Privacy Practices when using your PHI.

Business Associates: Mount Carmel will share PHI with Business Associates that are contracted to perform business functions for Mount Carmel or Trinity Health. These arrangements require Business Associates to keep your information confidential.

Medical Staff: Mount Carmel participates with the medical staff in an organized health care arrangement to deliver care to you at Mount Carmel. Both Mount Carmel and the medical staff have agreed to abide by the terms of this Notice for the PHI created or received as part of delivering health care services at Mount Carmel. Mount Carmel will also share your PHI with the medical staff for payment, treatment and health care operations purposes.

Affiliations: Mount Carmel is affiliated with the following health care organizations and associated hospital-based services and will share your PHI for the purposes of your treatment, payment and health care operations of these organizations:

*Mount Carmel St. Ann's Hospital
Mount Carmel Health d.b.a. Mount Carmel East Hospital and
Mount Carmel West Hospital
Mount Carmel New Albany Surgical Hospital*

COMPLAINTS

If you believe your privacy rights have been violated, you may file a complaint with Mount Carmel or with the Secretary of the Department of Health and Human Services. All complaints must be submitted in writing to Mount Carmel's Privacy Official at 6150 E. Broad Street, EA388, Columbus, Ohio 43213. Mount Carmel assures you that there will be no retaliation for filing a complaint.

FURTHER INFORMATION

To obtain additional information, please contact Mount Carmel's Privacy Official at (614) 546-3292.

CHANGES TO THIS NOTICE:

Mount Carmel will abide by the terms of the notice currently in effect for PHI in our possession including medical records generated by us. Mount Carmel reserves the right to change the terms of its notice and to make the new notice provisions effective for all PHI that it maintains. You will receive the most current Notice at your next scheduled visit. We are required to post this Notice in a prominent location within our facilities. Our current Notice of Privacy Practices is available on our website at www.mountcarmelhealth.com.