



MOUNT CARMEL
HEALTHPROVIDERS, INC.

NOTICE OF PRIVACY PRACTICES
Effective Date 4/1/03
Version 010206.0

THIS OFFICE IS A MEMBER OF MOUNT CARMEL HEALTHPROVIDERS INC. THIS NOTICE DESCRIBES HOW INDIVIDUALLY IDENTIFIABLE INFORMATION ABOUT YOU WILL BE USED AND DISCLOSED BY THIS OFFICE AND HOW YOU CAN GET ACCESS TO THIS INFORMATION. PLEASE REVIEW IT CAREFULLY.

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

Mount Carmel HealthProviders is required by law to maintain the privacy of individually identifiable patient health information (this information is "protected health information" and is referred to herein as "PHI") and to provide you with an explanation of how we handle your PHI. We will only use or disclose your PHI as permitted or required by applicable state or federal law. Upon request, Mount Carmel HealthProviders can provide you with a more extensive explanation regarding our privacy practices and your rights.

PERMITTED USES AND DISCLOSURES OF YOUR HEALTH INFORMATION:

Treatment: Mount Carmel HealthProviders 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 our individual physician offices and also 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 HealthProviders will use and disclose your PHI to obtain resources and inform you of, 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 HealthProviders 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 HealthProviders purchases from an outside vendor or from the donation database and not from patient information Mount Carmel HealthProviders collects.

Payment: Mount Carmel HealthProviders 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.

Health Care Operations: Mount Carmel HealthProviders 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 HealthProviders will use and disclose PHI to contact you as a reminder that you have an appointment for treatment or medical care at this office.

Family and Friends: Mount Carmel HealthProviders will disclose, upon your direction, 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. You can request a limitation or restriction on the disclosure of your PHI for some or all of your friends or family.

Disaster Relief: Unless you request a restriction or limitation, we will disclose your medical information to a public or private entity authorized by law or by its 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 HealthProviders 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 HealthProviders will disclose PHI about you when required to do so by federal, state or local law. Such examples could include reporting of infectious diseases, neglect and abuse as required by law. Mount Carmel HealthProviders is also required to provide information for judicial and administrative proceedings, and specialized governmental functions, to process Worker's Compensation claims, for vital statistics purposes, to health oversight agencies. In Ohio the state 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 HealthProviders will abide by the most stringent state and federal laws.

FDA Regulated Products: Mount Carmel HealthProviders 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 their identifying information.

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

Health or Safety: Mount Carmel HealthProviders 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 HealthProviders does not share your PHI with companies that sell health care products or services, such as drug companies. Mount Carmel HealthProviders does maintain a database of individuals who have received services at Mount Carmel, and you will be included in this database.

Research: Mount Carmel HealthProviders will 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 HealthProviders 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 treatment obtained at a Mount Carmel HealthProvider office are property of Mount Carmel HealthProviders, 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 a Mount Carmel HealthProvider office 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 HealthProviders will consider your request, but is not required to agree to your requested restrictions.

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

Right to Amend: You have the right to request an amendment of your PHI for as long as Mount Carmel HealthProviders maintains it with some exceptions.

Right to an Accounting: You have a right to receive an accounting of certain disclosures of your PHI that Mount Carmel HealthProviders made with some exceptions.

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 furtherance of Mount Carmel HealthProvider's mission to improve the health of the community, Mount Carmel HealthProviders 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 HealthProviders, 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 HealthProviders and/or for the health care operations permitted by HIPAA with respect to our mutual patients. Trinity Health will also abide by the terms of their Notice of Privacy Practices when using your PHI.

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

Affiliations: Mount Carmel HealthProviders is directly affiliated with the following offices and will share information with these affiliated entities for the purposes of your treatment, payment and health care operations:

HealthProvider Primary Care Offices:

Alexandria Family Health, Arlington Primary Care, Big Run Pediatrics, Canal Winchester Family Health, Caren Way Family Health, Circleville Family Health, Clintonville Family Health, Cooper Road Family Health, Crosswoods Family Health, Darby Creek Family Health, Highview Family Health, Hilliard Family Health and Internal Medicine, Hilltop Family Health, National Road Family Health, New Albany Family Health, Northeast Family Health, Northland Family Practice, Pickerington Family Practice, Pickerington Run Family Health, Sedalia Medical Center, Stonecreek Family Health, Taylor Station Family Health, Trivillage Family Health, Victorian Village Family Health, Wedgewood Family Health, Welsh Hills Family Health, West Jefferson Medical Center Family Health, Westerville Family Health,

HealthProvider Specialty Offices:

Vascular Services of Ohio, Mount Carmel Neurology at West, Mount Carmel Neurology at St. Anns, Mount Carmel Neurosurgery at West.

HealthProvider Urgent Care Offices:

Mount Carmel Urgent Care at Grove City, Mount Carmel Urgent Care at Mill Run, Mount Carmel Urgent Care at Scioto Darby.

Mount Carmel HealthProviders is also affiliated with Mount Carmel Health Systems and will share your PHI for the purposes of your treatment with these affiliated entities

COMPLAINTS AND FURTHER INFORMATION

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. To obtain additional information or to file a complaint with Mount Carmel HealthProviders, please contact Mount Carmel HealthProvider's Privacy Officer, Geoff Gregory, at (614) 546-4426. All complaints must be submitted in writing directly to Mount Carmel HealthProvider's Privacy Officer at 6150 E. Broad St. Columbus, OH 43213. Mount Carmel HealthProviders assures you that there will be no retaliation for filing a complaint.

CHANGES TO THIS NOTICE:

Mount Carmel HealthProviders will abide by the terms of the notice currently in effect for PHI in our possession including medical records generated by us. Mount Carmel HealthProviders 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.mchealthproviders.com.