

# Notice of Privacy Practices & Patient Advance Notices

As required by the Privacy Regulations Created as a Result of the Health Insurance Portability and Accountability Act of 1996 (HIPAA)

**THIS NOTICE DESCRIBES HOW THE HEALTH INFORMATION ABOUT YOU (AS A PATIENT OF Virginia Pain and Addiction Treatment Center) MAY BE USED AND DISCLOSED, AND HOW YOU CAN GET ACCESS TO YOUR INDIVIDUALLY IDENTIFIABLE HEALTH INFORMATION.**

## PLEASE REVIEW THIS NOTICE CAREFULLY

### A. Regional Health Partners (RHP) COMMITMENT TO YOUR PRIVACY

RHP is dedicated to maintaining the privacy of your individually identifiable health information (IIHI). We will create records regarding you and the treatment and services we provide to you. We are required by law to maintain the confidentiality of IIHI that identifies you and to provide you with this notice of our legal duties and the privacy practices that we maintain in our practice concerning your IIHI. By federal and state law, we must follow the terms of the notice of privacy practices that we have in effect at the time.

We must provide you with the following important information:

- How we may use and disclose your IIHI
- Your privacy rights in your IIHI
- Our obligations concerning the use and disclosure of your IIHI

The terms of this notice apply to all records containing your IIHI that are created or retained by RHP. We reserve the right to revise or amend this Notice of Privacy Practices. Any revision or amendment to this notice will be effective for all of your records that RHP has created or maintained in the past, and for any of your records that we may create or maintain in the future. RHP will post a copy of our current Notice in our offices in a visible location at all times, and you may request a copy of our most current Notice at any time.

### B. IF YOU HAVE QUESTIONS ABOUT THIS NOTICE, PLEASE CONTACT:

Privacy Officer or Administrator at RHP (703) 691-4000.

### C. WE MAY USE AND DISCLOSE YOUR INDIVIDUALLY IDENTIFIABLE HEALTH INFORMATION (IIHI) IN THE FOLLOWING WAYS

The following categories describe the different ways in which we may use and disclose your IIHI.

**1. Treatment.** RHP may use your IIHI to treat you. For example, we may ask you to have laboratory tests (such as blood or urine tests), and we may use the results to help us reach a diagnosis. We might use your IIHI in order to write a prescription for you, or we might disclose your IIHI to a pharmacy when we order a prescription for you. Many of the people who work for RHP – including, but not limited to, our doctors and nurses – may use or disclose your IIHI in order to treat you or to assist others in your treatment. Additionally, we may disclose your IIHI to others who may assist in your care, such as your spouse, children or parents. Finally, we may also disclose your IIHI to other health care providers for purposes related to your treatment.

**2. Payment.** RHP may use and disclose your IIHI in order to bill and collect payment for the services and items you may receive from us. We also may use and disclose your IIHI to obtain payment from third parties that may be responsible for such costs, your health insurer, other health care providers / entities or to bill you directly to assist in collection efforts.

**3. Health Care Operations.** RHP may use and disclose your IIHI to operate our business. As examples of the ways in which we may use and disclose your information for our operations, our practice may use your IIHI to evaluate the quality of care you received from us, or conduct cost-management and business planning activities for our practice. We may disclose your IIHI to other health care providers and entities to assist in their health care operations.

**4. Appointment Reminders.** RHP may use and disclose your IIHI to contact you and remind you of an appointment.

**5. Treatment Options.** RHP use and disclose your IIHI to inform you of potential treatment options or alternatives.

**6. Health-Related Benefits and Services.** RHP may use and disclose your IIHI to inform you of health-related benefits or services that may be of interest to you.

**7. Disclosures Required by Law.** RHP will use and disclose your IIHI when we are required to do so by federal, state or local law.

### D. USE AND DISCLOSURE OF YOUR IIHI IN CERTAIN SPECIAL CIRCUMSTANCES

The following categories describe unique scenarios in which RHP may use or disclose your identifiable health information:

**1. Public Health Risks.** RHP may disclose your IIHI to public health authorities that are authorized by law to collect information for the purpose of:

- Maintaining vital records, such as births and deaths
- Reporting child abuse or neglect
- Preventing or controlling disease, injury or disability
- Notifying a person regarding potential exposure to a communicable disease
- Notifying a person regarding a potential risk for spreading or contracting a disease or condition
- Reporting reactions to drugs or problems with products or devices
- Notifying individuals if a product or device they may be using has been recalled
- Notifying appropriate government agency(ies) and authority(ies) regarding the potential abuse or neglect of an adult patient (including domestic violence); however, RHP will only disclose this information if the patient agrees or we are required or authorized by law
- Notifying your employer under limited circumstances related primarily to workplace injury or illness or medical surveillance.

**2. Health Oversight Activities.** RHP may disclose your IIHI to a health oversight agency for activities authorized by law.

**3. Lawsuits and Similar Proceedings.** RHP may use and disclose your IIHI in response to a court or administrative order, if you are involved in a lawsuit or similar proceeding.

**4. Law Enforcement.** RHP may release IIHI if asked to do so by law enforcement official:

- Regarding a crime victim in certain situations, if we are unable to obtain the person's agreement
- Concerning a death we believe has resulted from criminal conduct
- Regarding criminal conduct at our offices
- In response to a warrant, summons, court order, subpoena or similar legal process
- To identify / locate a suspect, material witness, fugitive or missing person
- In an emergency, to report a crime (including the location or victim(s) of the crime, or the description, identity or location of the perpetrator)

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**5. Serious Threats to Health or Safety.** RHP may use and disclose your IIHI when necessary to reduce or prevent a serious threat to your health and safety or the health and safety of another individual or the public. Under these circumstances, we will only make disclosures to a person or organization able to help prevent the threat.

**6. Military.** RHP may disclose your IIHI if you are a member of U.S. or foreign military forces (including veterans) and if required by the appropriate authorities.

**7. National Security.** RHP may disclose your IIHI to federal officials for intelligence and national security activities authorized by law. We may also disclose your IIHI to federal officials in order to protect the President, other officials or foreign heads of state, or to conduct investigations.

**8. Inmates.** RHP may disclose your IIHI to correctional institutions or law enforcement officials if you are an inmate or under custody of law enforcement official.

**9. Worker's Compensation.** RHP may release your IIHI for worker's compensation and similar programs.

## E. YOUR RIGHTS REGARDING YOUR IIHI

You have the following rights regarding the IIHI that we maintain about you:

**1. Confidential Communications.** You have the right to request that RHP communicate with you about your health and related issues in a particular manner or at a certain location. For instance, you may ask that we contact you at home, rather than work. In order to request a type of confidential communication, you must make written request to **Privacy Office at RHP** specifying the requested method of contact, or the location where you wish to be contacted. RHP will accommodate **reasonable** requests.

**2. Requesting Restrictions.** You have the right to request a restriction in our use or disclosure of your IIHI for treatment, payment or health care operations. You have the right to request that we restrict our disclosure of your IIHI only to certain individuals involved in your care or the payment for your care, such as family members and friends. **We are not required to agree to your request;** however, if we do agree, we are bound by our agreement except when otherwise required by law, in emergencies, or when the information is necessary to treat you. Your request for a restriction in our use or disclosure of your IIHI must be made in writing to **Privacy Office at RHP**. Your request must describe in clear and concise fashion:

- The information you wish restricted
- Whether you are requesting to limit our practice's use, disclosure or both; and
- To whom you may want the limits to apply

**3. Inspection and Copies.** You have the right to inspect and obtain a copy of the IIHI that may be used to make decisions about you, including patient medical records and billing records, but not including psychotherapy notes. You must submit your request in writing to **Privacy Office at RHP** in order to inspect and / or obtain a copy of your IIHI. RHP may charge a fee for the costs of copying, mailing, labor and supplies associated with your request. RHP may deny your request to inspect and / or copy in certain limited circumstances; however, you may request a review of our denial. Another licensed health care professional chosen by us will conduct reviews.

**4. Amendment.** You may ask us to amend your health information if you believe it is incorrect or incomplete, and you may request an amendment for as long as the information is kept by or for our practice. To request an amendment, your request must be in writing and submitted to **Privacy Office at RHP**. You must provide us with a reason that supports your request for amendment. RHP will deny your request if you fail to submit your request (and reason supporting your request) in writing. Also, we may deny your request if you ask us to amend information that is in our opinion: (a) accurate and complete; (b) not part of the IIHI kept by or for the practice; (c) not part of the IIHI which you would be permitted to inspect and copy; or (d) not created by RHP, unless the individual or entity that created the information is not available to amend the information.

**5. Accounting of Disclosures.** All of our patients have the right to request an "accounting of disclosures." An "accounting of disclosures" is a list of certain non-routine disclosures RHP has made of your IIHI for non-treatment, non-payment or non-operations purposes. Use of your IIHI as part of the routine patient care in our practice is not required to be documented, for example, the doctor sharing information with the nurse; or the billing department using your information to file your insurance claim. In order to obtain an accounting of disclosures, you must submit your request in writing to **Privacy Office at RHP**. All requests for an "accounting of disclosures" must state a time period, which may not be longer than six (6) years from the date of disclosure and may not include dates before April 14, 2003. The first list you request within a 12-month period is free of charge, but RHP may charge you for additional lists within the same 12-month period. RHP will notify you of the costs involved with additional requests, and you may withdraw your request before you incur any costs.

**6. Right to a Paper Copy of This Notice.** You are entitled to receive a paper copy of our notice of privacy practices. You may ask us to give you a copy of this notice at any time. To obtain a paper copy of this notice, contact **Privacy Office at RHP** at (703) 691-4000.

**7. Right to File a Complaint.** If you believe your privacy rights have been violated, you may file a complaint with RHP or with the Secretary of the Department of Health and Human Services. To file a complaint with RHP, contact **Privacy Office at RHP**. All complaints must be submitted in writing. **You will not be penalized for filing a complaint.**

**8. Right to Provide an Authorization for Other Uses and Disclosures.** RHP will obtain your written authorization for uses and disclosures that are not identified by this notice or permitted by applicable law. Any authorization you provide to us regarding the use and disclosure of your IIHI may be revoked at any time in writing. After you revoke your authorization, we will no longer use or disclose your IIHI for the reasons described in the authorization. Please note we are required to retain records for your care.

Again, if you have any questions regarding this notice or RHP's health information privacy policies, please contact **Privacy Office at RHP** at (703) 691-4000.

RHP's Notice of Privacy Practices is available upon request. Patient Advance Notices, which includes Patient Bill of Rights, Patient Responsibility Statement, Grievances and Notice of Privacy Practices is available throughout the facility, and upon request.

I, the undersigned patient, have read, understand, agree to and have received a copy of RHP's Notice of Privacy Practices & Patient Advance Notices which includes Patient Bill of Rights, Patient Responsibility Statement, Grievances and Notice of Privacy Practices.

**Patient Signature:** \_\_\_\_\_ **Print Name:** \_\_\_\_\_ **Date:** \_\_\_\_\_