

MARINA VILLAGE MEDICINE

NOTICE OF PRIVACY POLICIES

AUGUST 18, 2014

Notice of Privacy Practices

This Notice describes how medical information about you may be used and disclosed, and how you can get access to this information. Please review it carefully.

Understanding Your Health Information

Each time you visit a hospital, physician, or other healthcare provider, a record of your visit is made in order to manage the care you receive. Marina Village Medicine understands that the medical information that is recorded about you and your health is personal. The confidentiality of your health information is also protected under both state and federal law.

This Notice of Privacy Practices describes how Marina Village Medicine may use and disclose your information and the rights that you have regarding your health information.

Marina Village Medicine is in the process of transitioning from a paper-based health record to an electronic health record and will not use or disclose your health information without written authorization, except as described in this Notice. Use or disclosure pursuant to this Notice may include electronic transfer of your health information.

Your Health Information Rights

Although your health information is the physical property of the facility or practitioner that compiled it, the information belongs to you, and you have certain rights over that information. You have the right to:

- Request, in writing, a restriction on certain uses and disclosures of your health information. However, agreement with the request is not required by law, such as when it is determined that compliance with the restriction cannot be guaranteed. In addition, you have the right to request, in writing, a restriction on disclosures of health information to a health plan with respect to treatment services for which you have paid out of pocket in full. In this case, we will honor the request. It will be your responsibility to notify any other provider of this restriction.
- Request by written authorization to inspect or obtain a copy of your health record as provided by law;
- Request, in writing, that your health record be amended as provided by law, if you feel the health information we have about you is incorrect or incomplete. You will be notified if the request cannot be granted;
- Request that we communicate with you about your health information in a specific way or at a specific location. Reasonable requests will be accommodated;
- Request in writing to obtain an accounting of disclosures or a report of who has accessed your health information as provided by law. The access report will only be available after federal regulations become effective.
- Obtain a paper copy of this Notice of Privacy Practices on request.

You may exercise these rights by directing a request to the Privacy Officer contact listed on this Notice.

Our Responsibilities

Marina Village Medicine has certain responsibilities regarding your health information, including the requirement to:

- Maintain the privacy of your health information;
- Provide you with this Notice that describes Marina Village Medicine legal duties and privacy practices regarding the information that we maintain about you;
- Abide by the terms of the Notice currently in effect.
- Inform you that the clinic must keep your medical records for a time period required by law and then may dispose of them as permitted by law.

We will not use or disclose your health information without your authorization, except as described in this notice. We will also discontinue to use or to disclose your health information after we have received a written revocation of the authorization according to the procedures included in the authorization.

Marina Village Medicine reserves the right to change the information privacy policies and practices and to make the changes applicable to any health information that we maintain. If changes are made, the revised Notice of Privacy Practices will be made available at Marina Village Medicine, posted on the web site, and will be supplied when requested.

Uses and Disclosures of Health Information without Authorization

When you obtain services from Marina Village Medicine, certain uses and disclosures of your health information are necessary and permitted by law in order to treat you, to process payments for your treatment and to support the operations of the entity and other involved providers. The following categories describe ways that Marina Village Medicine may use or disclose your information, and some representative examples are provided in each category. All of the ways your health information is used or disclosed should fall within one of these categories.

Your health information will be used for treatment.

For example: Disclosures of medical information about you may be made to doctors, nurses, technicians, medical residents or others who are involved in taking care of you at Marina Village Medicine. This information may be disclosed to other physicians who are treating you or to other healthcare facilities and providers who are involved in your care. Information may be shared with pharmacies, laboratories or radiology centers for the coordination of different treatments.

Your health information will be used for payment.

For example: Health information about you may be disclosed so that services provided to you may be billed to an insurance company or a third party. Information may be provided to your health plan about treatment you are going to receive in order to obtain prior approval or to determine if your health plan will cover the treatment.

Your health information will be used for health care operations.

For example: The information in your health record may be used to evaluate and improve the quality of the care and services we provide. Students, volunteers, and trainees may have access to your health information for training and treatment purposes as they participate in continuing education, training, internships, and residency programs.

Business Associates: There are some services that we provide through contracts with third party business associates. Examples

include physician services in the emergency department and radiology, certain laboratory tests, and a copy service we use when making copies of your health record. When these services are contracted, we may disclose your health information and bill you or your third-party payer for services rendered. To protect your health information, however, we require these business associates to appropriately protect your information.

Continuity of Care: In order to provide for the continuity of your care once you are discharged from a facility or hospital, your information may be shared with other healthcare providers such as home health agencies and others. Information about you may be disclosed to community services agencies in order to obtain their services on your behalf.

Communication with family: Health professionals, using their best judgment, may disclose to a family member, other relative, close personal friend or any other person you identify, health information relevant to that person's involvement in your care or payment related to your care.

Notification: We may notify your family or assist in notifying members of your family, personal representative, or another person responsible for your care, your location, and general condition.

Appointment Reminders: We may use and disclose medical information to contact and remind you about appointments. If you are not home, we may leave information on your answering machine or in a message left with the person answering the phone. We may send out postcards to remind you to make an appointment, as well as to recommend treatment alternatives.

Community Programs: Contacting you about disease management programs, wellness programs, or other community-based initiatives or activities in which Marina Village Medicine participates.

Disclosures Required by Law or otherwise Allowed without Authorization or Notification.

The following disclosures of health information may be made according to state and federal law without your written authorization or verbal agreement:

- When a disclosure is required by federal, state or local law, judicial or administrative proceedings, or for law enforcement. Examples would be reporting gunshot wounds or child abuse, or responding to court orders;
- For public health purposes, such as reporting information about births, deaths, and various diseases, or disclosures to the FDA regarding adverse events related to food, medications or devices;
- For health oversight activities, such as audits, inspections or licensure investigations;
- To organ procurement organizations for the purpose of tissue donation and transplant;
- For research purposes, when the research has been approved by an institutional review board that has reviewed the research proposal and established guidelines to provide for the privacy of your health information; or the disclosure is that of a limited data set, where personal identifiers have been removed.
- To coroners and funeral directors for the purpose of identification, the determination of the cause of death, or to perform their duties as authorized by law;
- To avoid a serious threat to the health or safety of a person or the public;
- For specific government functions, such as protection of the President of the United States;
- For workers' compensation purposes;
- To military command authorities as required for members of the armed forces;

- To authorized federal officials for national security and intelligence activities as authorized by law;
- To correctional institutions or law enforcement officials concerning the health information of inmates, as authorized by law.

Required Uses and Disclosures

Under the law we must make disclosures when required by the Secretary of the Department of Health and Human Services to investigate or determine our compliance with federal privacy law.

Authorization Required

We must obtain your written authorization in order to use or disclose psychotherapy notes, use or disclose your protected health information for marketing purposes, or to sell your protected health information.

Privacy Complaints

You have the right to file a complaint if you believe your privacy rights have been violated. This complaint may be addressed to the Privacy Officer contact listed in this Notice, or to the Secretary of the Department of Health and Human Services. There will be no retaliation for registering a complaint.

Privacy Contact

Address any questions about this Notice or how to exercise your privacy rights to the applicable Privacy Officer Contact listed below:

Marina Village Medicine
(510) 227-5540