

NOTICE OF PRIVACY PRACTICES

Effective Date: 4/14/2003; Revised: 4/13/2012

**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.**

For More Information, Please Contact Us:

Sara J. Frey, Privacy Officer
East Hartford Community HealthCare, Inc.
94 Connecticut Boulevard, East Hartford, CT 06108
Ph. (860) 528-1359

Who We Are:

This Notice describes the privacy practices of East Hartford Community HealthCare, Inc. (“we” or “Health Center”) and the privacy practices of:

- all of our doctors, nurses, and other health care professionals authorized to enter information (including dental) about you into your medical chart.
- all of our departments, including, e.g., our medical records and billing departments.
- all of our health center sites.
- all of our employees, staff, volunteers and other personnel who work for us or on our behalf.

Our Pledge:

We understand that health information about you and the health care you receive is personal. We are committed to protecting your personal health information. When you receive treatment and other health care services from us, we create a record of the services that you received. We need this record to provide you with quality care and to comply with legal requirements. This notice applies to all of our records about your care, whether made by our health care professionals or others working in this office, and tells you about the ways in which we may use and disclose your personal health information. This notice also describes your rights with respect to the health information that we keep about you and the obligations that we have when we use and disclose your health information.

We are required by law to:

- make sure that health information that identifies you is kept private.
- give you this notice of our legal duties and privacy practices with respect to your personal health information.
- follow the terms of the notice that is currently in effect for all of your personal health information.

How We May Use and Disclose Your Health Information:

Federal law allows us to use and disclose your personal health information for treatment, payment and health care operations without your consent. However, since Connecticut law continues to require that we obtain your consent for disclosure of personal health information for payment purposes (e.g., your insurer will require certain information to support our claim for payment), coordination of care with other providers (e.g., discharge planning and referrals), and the disclosure of certain sensitive information protected under Connecticut law, we will request your consent for disclosure of personal health information upon registration.

For Treatment. We may use health information about you to provide you with health care treatment or services. We may disclose health information about you to the doctors, nurses, technicians, medical students and others who are involved in your care. They may work at the Health Center, at the hospital if you are hospitalized under our supervision, or at another doctor’s office, lab, pharmacy or other health care provider to whom we may refer you for treatment, consultation, x-rays, lab tests, prescriptions or other health care services. For example, we may disclose to an emergency room doctor who is treating you for a broken leg that you have diabetes, because diabetes may affect your body’s healing process.

For Payment. We may use and disclose health information about you to bill and collect payment from you, your insurance company, including Medicaid and Medicare, or other third party that may be available to reimburse us for some or all of your health care. We may also disclose health information about you to other health care providers or to your health plan so that they

can arrange for payment relating to your care. For example, if you have health insurance, we may need to share information about your office visit with your health plan in order for your health plan to pay us or reimburse you for the visit. We may also tell your health plan about treatment that you need to obtain your health plan's prior approval or to determine whether your plan will cover the treatment.

For Health Care Operations. We may use and disclose health information about you for our day-to-day operations, and may disclose information about you to other health care providers involved in your care or to your health plan for use in their day-to-day operations. These uses and disclosures are necessary to run the Health Center and to make sure that all of our patients receive quality care, and to assist other providers and health plans in doing so as well. For example, we may use health information to review the services that we provide and to evaluate the performance of our staff in caring for you. We may also combine health information about our patients with health information from other health care providers to decide what additional services the Health Center should offer, what services are not needed, whether new treatments are effective or to compare how we are doing with others and to see where we can make improvements. We may remove information that identifies you from this set of health information so others may use it to study health care delivery without learning who our patients are.

Unless you object or specifically request to restrict use, some of the other ways in which the Health Center will use or disclose your personal health information are:

Appointment Reminders. We may use and disclose health information about you to contact you as a reminder that you have an appointment at the Health Center.

Marketing and Fundraising. We may use and disclose health information about you to contact you regarding treatment alternatives, health-related benefits, programs, services, events and functions which may be of interest to you, and to conduct fundraising by and for the Health Center. Please let us know if you do not want us to contact you for these purposes or if you wish to have us use a different address when sending this information to you.

Individuals Involved in Your Care or Payment for Your Care. We may release health information about you to your family member(s), legally authorized representative(s), and any other person identified by you, which is directly relevant to such person's involvement in your care or payment for your care, and to notify or assist in the notification of a family member, a personal representative, or any other person responsible for you. Such notification may include your location, general condition, or death, but will *not* include confidential HIV-related, drug and alcohol or psychiatric information. If you are able, we will provide you with the opportunity to consent or object to such disclosure. If you are unable to object due to your incapacity or an emergency circumstance, the Health Center, based upon its professional judgment, will make such disclosure if it determines that it is in your best interest to do so. Such disclosure of personal health information will be limited to information that is directly relevant to the recipient's involvement in your health care.

We may make disclosures of your personal health information to a public or private entity charged by law or its charter to assist in disaster relief efforts for the purposes of coordinating the disclosures described in the above paragraph.

Research. Under certain circumstances, we may use and disclose health information about you for research purposes. For example, a research project may involve comparing the health and recovery of all patients who received one medication to those who received another for the same condition. All research projects, however, are subject to a special approval process. This process evaluates a proposed research project and its use of health information, trying to balance the research needs with a patient's need for privacy. Before we use or disclose health information for research, the project will have been approved through this special approval process, although we may disclose health information about you to people preparing to conduct a research project. For example, we may help potential researchers look for patients with specific health needs, so long as the health information they review does not leave our facility. We will almost always ask for your specific permission if the researcher will have access to your name, address, or other information that reveals who you are or will be involved in your care.

Organ and Tissue Donation. If you are an organ donor, we may disclose health information about you to organizations that handle organ procurement or organ, eye or tissue transplantation or to an organ donation bank, as necessary to facilitate organ or tissue donation and transplantation.

As Required By Law. We will disclose health information about you when required to do so by federal, state or local law.

To Avert a Serious Threat to Health or Safety. We may use and disclose health information about you when necessary to prevent a serious threat to your health and safety or the health and safety of the public or another person. Any disclosure, however, would only be to someone able to help prevent the threat.

Military and Veterans. If you are a member of the armed forces or separated/discharged from military services, we may release health information about you as required by military command authorities or the Department of Veterans Affairs as may be applicable. We may also release health information about foreign military personnel to the appropriate foreign military authorities.

Workers' Compensation. We may release health information about you for workers' compensation or similar programs. These programs provide benefits for work-related injuries or illness.

Public Health Activities. We may disclose health information about you for public health activities. These activities generally include the following:

- to prevent or control disease, injury or disability.
- to report births and deaths.
- to report child abuse or neglect.
- to report reactions to medications or problems with products.
- to notify people of recalls of products.
- to notify a person who may have been exposed to a disease or may be at risk for contracting or spreading a disease or condition.
- to notify the appropriate government authority if we believe a patient has been the victim of abuse, neglect or domestic violence. We will only make this disclosure if you agree or when required or authorized by law.

Health Oversight Activities. We may disclose health information about you to a health oversight agency for activities authorized by law. These oversight activities include, for example, audits, investigations, inspections and licensure. These activities are necessary for the government to monitor the health care system, government programs and compliance with civil rights laws.

Food and Drug Administration. We may disclose your health information to a person or company required by the Food and Drug Administration to report adverse events, product defects or problems, biologist product deviations, track products; to enable product recalls; to make repairs or replacement, or to conduct post marketing surveillance, as required.

Lawsuits and Disputes. We may disclose health information about you in response to a court or administrative order. We may also disclose health information about you in response to a subpoena, discovery request or other lawful process that is not accompanied by a court or administrative order, but only if efforts have been made to tell you about the request or to obtain an order protecting the information requested.

Law Enforcement. We may release health information about you if asked to do so by a law enforcement official:

- in response to a court order, subpoena, warrant, summons or similar process.
- to identify or locate a suspect, fugitive, material witness or missing person.
- under certain limited circumstances, about the victim of a crime.
- about a death we believe may be the result of criminal conduct.
- about criminal conduct at the Health Center.
- in emergency circumstances to report a crime, the location of the crime or victims, or the identity, description or location of the person who committed the crime.

Coroners, Health Examiners and Funeral Directors. We may release health information about our patients to a coroner or health examiner. This may be necessary, for example, to identify a deceased person or determine the cause of death. We may also release health information to funeral directors as may be necessary for them to carry out their duties.

National Security and Intelligence Activities. We may release health information about you to authorized federal officials for intelligence, counterintelligence and other national security activities authorized by law.

Protective Services for the President and Others. We may disclose health information about you to authorized federal officials so they may provide protection to the President, other authorized persons or foreign heads of state or conduct special investigations.

Inmates. If you are an inmate of a correctional institution or under the custody of a law enforcement official, we may release health information about you to the corrections institution or law enforcement official. This release would be necessary (1) for the institution to provide you with health care, (2) to protect your health and safety or the health and safety of others, or (3) for the safety and security of the correctional institution.

All other uses or disclosures will only be made with your specific written authorization, which may be revoked, except to the extent it has already been relied upon.

Special rules for Drug and Alcohol and HIV-related protected information:

Protected HIV-Related Information: Special rules under Connecticut law limit the disclosure of HIV-related information. According to State law, we may not disclose such information without your specific written authorization, unless such disclosure is:

- made to a public health official as required or allowed by State or Federal law.
- a health care provider for the purposes of treatment.
- a medical examiner to determine the cause of death.
- to a Health Center committee or another organization for the purpose of oversight or monitoring of the Health Center.
- to a health care worker experiencing a significant occupational exposure to HIV infection.
- pursuant to a court order.
- life and health insurers.
- to your partner by a provider caring for you and your partner if it is believed by the provider that your partner is at significant risk for transmission.
- if you are a minor, to your parents or legal guardian, unless the provider determines there is cause (as defined by law) not to disclose to them.

Protected Drug and Alcohol Information: Federal law establishes certain protections for patient identifiable information relating to drug and alcohol treatment, treatment referral, research and/or rehabilitation (but excludes protection for a diagnosis of drug overdose or alcohol intoxication or a diagnosis made solely for the purpose of providing evidence for use by law enforcement authorities). As a general rule, protected drug and alcohol information is confidential and may not be disclosed without your authorization or pursuant to Federal law. Exceptions for disclosure of protected drug and alcohol information without your authorization are as follows:

- to medical personnel to the extent necessary to meet a bona fide medical emergency.
- to qualified personnel for the purpose of conducting research, management audits, or program evaluation, provided you are not identified in any report.
- pursuant to a court order where good cause for such disclosure has been established.
- communications between a program and an entity and an affiliated covered entity having direct administrative control over our program.
- to a Business Associate performing services on our behalf.
- limited communications with law enforcement regarding a crime committed or threatened by you on our premises.
- the reporting of incidents of suspected child abuse and neglect to the appropriate state authorities.
- to the Food and Drug Administration (FDA) when they assert that your health may be threatened by an error in the manufacture, labeling, or sale of a product under FDA jurisdiction.
- Communications for the reporting of vital statistics, to authorized agencies investigating an individual's cause of death, and to prevent multiple enrollments in certain programs as permitted or required by law.

Your Rights:

You have certain rights with respect to your personal health information. This section of our notice describes your rights and how to exercise them:

Right to Inspect and Copy: You have the right to inspect and copy the personal health information in your medical and billing records, or in any other group of records that we maintain and use to make health care decisions about you. To inspect and copy

your personal health information, you must submit your request in writing to our Privacy Contact Person identified on the first page of this notice. If you request a copy of the information, we may charge a fee for the copying and mailing costs, and for any other costs associated with your request. We may deny your request to inspect and copy in certain very limited circumstances. If your request is denied, you may request that the denial be reviewed. We will designate a licensed health care professional to review our decision to deny your request. The person conducting the review will not be the same person who denied your request. We will comply with the outcome of this review.

Right to Amend: If you feel that the health information we maintain about you is incorrect or incomplete, you may ask us to amend the information. You have the right to request an amendment for any information that we maintain about you. To request an amendment, your request must be made in writing, submitted to our Privacy Contact Person identified on the first page of this notice, and must be contained on one piece of paper legibly handwritten or typed. In addition, you must provide a reason that supports your request for an amendment. We may deny your request for an amendment if it is not in writing or does not include a reason to support the request. In addition, we may deny your request if you ask us to amend information that:

- was not created by us, unless the person or organization that created the information is no longer available to make the amendment,
- is not part of the health information kept by or for the Health Center,
- is not part of the information which you would be permitted to inspect and copy, or
- is accurate and complete.

Any amendment we make to your health information will be disclosed to the health care professionals involved in your care and to others to carry out payment and health care operations, as previously described in this notice.

Right to Receive an Accounting of Disclosures. You have the right to receive an accounting of certain disclosures of your health information that we have made. Any accounting will not include all disclosures that we make. For example, an accounting will not include disclosures:

- to carry out treatment, payment and health care operations as previously described in this notice.
- pursuant to your written authorization.
- to a family member, other relative, or personal friend involved in your care or payment for your care when you have given us permission to do so.
- to law enforcement officials.

To request an accounting of disclosures, you must submit your request in writing to our Privacy Contact Person identified on the first page of this notice. Your request must state a time period which may not be more than six (6) years and may not include dates before April 14, 2003. The first list you request within a 12 month period will be free. For additional lists, we may charge you for the costs of providing the list. We will notify you of the cost involved and you may choose to withdraw or modify your request at that time before any costs are incurred. We will mail you a list of disclosures in paper form within 30 days of your request, or notify you if we are unable to supply the list within that time period and by what date we can supply the list; this date will not exceed 60 days from the date you made the request.

Right to Request Restrictions. You have the right to request a restriction or limitation on the health information we use or disclose about you for treatment, payment or health care operations. You also have the right to request a limit on the health information we disclose about you to someone who is involved in your care or the payment for your care, such as a family member or friend. For example, you may request that we not disclose information about you to a certain doctor or other health care professional, or that we not disclose information to your spouse about certain care that you received.

We are not required to agree to your request for restrictions if it is not feasible for us to comply with your request or if we believe that it will negatively impact our ability to care for you *except that we must comply with the requested restriction if:*

- except as otherwise required by law, the disclosure is to a health plan for purposes of carrying out payment or health care operations (and is not for purposes of carrying out treatment) **AND**
- the protected health information pertains only to a health care item or service for which the health care provider involved has been paid *out of pocket in full*.

If we agree to a restriction voluntarily, we will comply with your request *unless the information is needed to provide emergency treatment*. If we are required by law to agree to a restriction, we will comply with your request unless the information is needed to provide treatment.

To request a restriction, you must make your request in writing to our Privacy Contact Person identified on the first page of this notice. In your request, you must tell us what information you want to limit and to whom you want the limits to apply.

Right to Receive Confidential Communications. You have the right to request that we communicate with you about health matters in a certain way. For example, you can ask that we only contact you at work or by mail to a specified address. To request that we communicate with you in a certain way, you must make your request in writing to our Privacy Contact Person identified on the first page of this notice. We will not ask you the reason for your request. Your request must specify how or where you wish to be contacted. We will accommodate all reasonable requests.

Right to a Paper Copy of this Notice. You have the right to receive a paper copy of this notice at any time. To receive a copy, please request it from our Privacy Contact Person identified on the first page of this notice.

Changes to this Notice:

We reserve the right to change this notice and to make the changed notice effective for all of the health information that we maintain about you, whether it is information that we previously received about you or information we may receive about you in the future. We will post a copy of our current notice in our facility. Our notice will indicate the effective date on the first page, in the top right-hand corner. We will also give you a copy of our current notice upon request.

Complaints:

If you believe your privacy rights have been violated, you may file a complaint with us or with the Secretary of the Department of Health and Human Services.

You may file a complaint with Provider by mailing a written description of your complaint or by telling your complaint in person or over the telephone to: Sara J. Frey, Privacy Officer, East Hartford Community HealthCare, Inc., 94 Connecticut Boulevard, East Hartford, CT 06108, Ph. (860) 528-1359. *Please describe what happened and give us the dates and names of anyone involved. Please also let us know how to contact you so that we can respond to your complaint.*

You may file a complaint with the Secretary of the Department of Health and Human Services by contacting: Office of Civil Rights, U.S. Department of Health and Human Services, Government Center, J.F. Kennedy Federal Building, Room 1875, Boston, MA 02203, Ph. (617) 565-1340; Fax (617) 565-3809; TDD (617) 565-1343.

You will not be penalized for filing a complaint.

Other Uses and Disclosures of Your Protected Health Information:

Other uses and disclosures of personal health information not covered by this notice or applicable law will be made only with your written authorization. If you give us your written authorization to use or disclose your personal health information, you may revoke your authorization, in writing, at any time. If you revoke your authorization, we will no longer use or disclose your personal health information for the reasons covered by your written authorization. You understand that we are unable to take back any uses and disclosures that we have already made with your authorization, and that we are required to retain our records of the care that we have provided to you.