

## **NOTICE OF PRIVACY PRACTICES**

### **Under the Health Insurance Portability and Accountability Act (HIPAA)**

*This notice describes how information about you may be used and disclosed and how you can access this information. Please review it carefully.*

If you have any questions about this notice, please contact the Privacy Officer at (734) 722-2830.

This Notice of Privacy Practices describes how your Protected Health Information (PHI) may be used and disclosed for treatment, payment or healthcare operations purposes and for other reasons that are permitted or required by law. It also describes your right to access and control your PHI. PHI is information about you, including demographic information, that may identify you and that relates to your past, present or future physical or mental health or condition and related healthcare services.

The Senior Alliance (TSA), Area Agency on Aging 1-C is required to abide by the terms of this Notice of Privacy Practices. TSA may change the terms of this notice at any time. The new notice will be effective for all PHI maintained at that time. Upon your request, a new Notice of Privacy Practices will be provided to you. To request a revised notice, please contact the Privacy Officer at (734) 722-2830 and ask that the notice be mailed to you. You can also request that it be provided to you at your next scheduled appointment.

#### **Uses and Disclosures of Protected Health Information (PHI)**

##### **PHI can be used and disclosed for treatment, payment or healthcare operations.**

Treatment refers to providing, coordinating or managing your healthcare and any related services. An example of this is releasing information to a home health care agency so that in-home services can be provided.

Payment refers to obtaining payment for your healthcare services. This includes releasing information to determine eligibility or coverage, reviewing services for medical necessity and utilization review purposes.

Healthcare Operations refers to TSA's business activities, such as quality assurance, employee review activities, training, licensing and other business activities.

##### **PHI can be used and disclosed with your written authorization.**

Other uses and disclosures of your PHI will be made only with your written authorization, unless otherwise permitted or required by law as described below. You may revoke this authorization at any time, in writing, except to the extent that action has already been taken on the use or disclosure indicated in the authorization.

##### **Other permitted and required uses and disclosures that may be made if you do not object:**

Others involved in your healthcare: Unless you object, TSA may disclose PHI to a member of your family, a close friend or any other person you identify if the information relates directly to that person's involvement in your healthcare. This will include any family members or friends whose names and telephone numbers you provide to TSA during a home visit or telephone contact. If you are unable to agree or object to such a disclosure, TSA may disclose information as necessary if it is in your best interest to do so.

TSA may use or disclose your PHI to an authorized public or private entity to assist in disaster relief efforts and to coordinate uses and disclosures to family members or other individuals involved in your healthcare.

**Other permitted and required uses and disclosures that may be made without your authorization or opportunity to object:**

Required by Law: TSA may use or disclose your PHI to the extent required by law. The use or disclosure will be made in compliance with the law and will be limited to the relevant requirements of the law.

Abuse or Neglect: TSA may disclose your PHI to a public authority that is authorized by law to receive reports of abuse or neglect. In this case, the disclosure will be made consistent with the requirements of applicable federal and State laws.

Emergency Situations: TSA may disclose your PHI to appropriate emergency personnel in emergency situations.

Public health: TSA may disclose your PHI for public health activities and purposes to a public health authority that is permitted by law to collect or receive the information. The disclosure will be made for the purpose of controlling disease, injury or disability.

Health Oversight: TSA may disclose PHI to a health oversight agency for activities authorized by law, such as audits, investigations and inspections. Oversight agencies seeking this information include government agencies that oversee the health care system, government benefit programs, other government regulatory programs and civil rights laws.

Legal Proceedings: TSA may disclose PHI in the course of any judicial or administrative proceeding, in response to an order of a court or administrative tribunal, in response to a subpoena or other lawful request.

Required uses and disclosures: under the law, TSA must make disclosures to you and as required by the Secretary of the Department of Health and Human Services to investigate or determine TSA's compliance with the requirements of the Health Insurance Portability and Accountability Act of 1996.

**Your Rights:**

**You have the right to access your PHI.** This means that you may inspect and obtain a copy of PHI that is contained in a designated record set (any medical, billing or other records) for as long as TSA maintains the information.

Under federal law, you may not inspect or copy the following records:

- Psychotherapy notes
- Information compiled in reasonable anticipation of, or for use in, a criminal, civil or administrative action or proceeding
- PHI that is subject to law that prohibits access.

In some cases, a decision to deny access may be reviewable. Please contact the Privacy Officer with any questions about accessing your records.

**You have the right to request a restriction of your PHI.** This means that you may ask TSA not to use or disclose any part of your record for the purposes of treatment, payment or healthcare operations. You may also request that all or part of your PHI not be disclosed to family members or friends who are involved in your care or for notification purposes as described in this Notice of Privacy Practices. Your request must describe the restriction requested and to whom you want the restriction to apply.

TSA is not required to agree to a requested restriction. If TSA believes that it is in your best interest to permit use and disclosure of your PHI, your PHI will not be restricted. If TSA does agree to the requested restriction, your PHI may not be used or disclosed in violation of the restriction except in emergency situations. You may request a restriction by contacting the Privacy Officer at (734) 722-2830. A form detailing the request process will be mailed to you at that time.

**You have the right to request confidential communications from TSA by an alternative means or at an alternative location.** Some examples of this are requests to receive mailings at a mailing address instead of your residence address or requests that messages not be left on a telephone answering machine. TSA will accommodate all reasonable requests. To make a request, please contact the Privacy Officer at (734) 722-2830. A form detailing the request process will be mailed to you at that time.

**You have the right to request an amendment of your PHI.** If you disagree with information in your record, you may request that the records be amended. In certain cases, this request may be denied. If the request is denied, you have the right to file a statement of disagreement. Please contact the Privacy Officer at (734) 722-2830 with any questions regarding amending your PHI.

**You have the right to receive an accounting of certain disclosures TSA has made, if any, of your PHI.** This right applies to disclosures for purposes other than treatment, payment or healthcare operations as described in this Notice of Privacy Practices. It excludes disclosures made to you, to family members or friends involved in your care; disclosures made for payment, treatment or healthcare operations purpose; or any disclosures authorized by you in writing. You have the right to receive information regarding disclosures that occurred after April 14, 2003. This right is subject to certain exceptions, restrictions and limitations. Contact the Privacy Officer at (734) 722-2830 to request an accounting of disclosures. Information detailing the request process will be mailed to you at that time.

**You have the right to receive a paper copy of this notice from TSA upon request, even if you have accepted the information electronically, and to receive updated notices upon request.**

**Complaints:**

You may complain to TSA or to the Secretary of Health and Human Services if you believe your privacy rights have been violated by TSA. You may file a complaint with TSA by notifying the Privacy Officer of your complaint. TSA will not retaliate against you in any way for filing a complaint.

For further information about the complaint process, please contact the Privacy Officer at (734) 722-2830.