

Notice of Privacy Practices

Medical Records Manual – HIPAA

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.

WHO WILL FOLLOW THIS NOTICE

This Notice of Privacy Practices (“Notice”) applies to Vitae Health Systems and the medical practices for which it renders management and practice support services (collectively “Vitae”), including Vitae’s owners, directors, employees, independent contractors, volunteers, and other personnel who are involved in your care. Vitae and these individuals will follow the terms of this Notice and may use or disclose medical information about you to carry out treatment, payment or health care operations, or for other purposes as permitted or required by law. This Notice describes your rights to access and control medical information about you, including information that may identify you and that relates to your past, present, or future physical, medical, or mental condition and medical care and related health care services. Vitae’s clinical services are provided as part of an organized health care arrangement which is a clinically integrated care setting in which individuals typically receive health care from more than one health care provider. The skilled nursing facility and other medical professionals who render services in this integrated model may have other policies that they follow and may use their own Notice of Privacy Practices.

VITAE’S PLEDGE REGARDING MEDICAL INFORMATION

Vitae understands that medical information about you and your health is personal. Vitae is committed to protecting medical information about you. In order to provide you with quality care and to comply with certain state and federal legal requirements, Vitae creates a record of the services you receive from its healthcare providers. This Notice applies to all of the records of your care generated by Vitae’s healthcare providers. This Notice will tell you about the ways in which Vitae may use and disclose medical information about you. It also describes your rights and certain obligations Vitae has regarding the use and disclosure of medical information. Vitae is required by law to: (1) Make sure that medical information that identifies you is kept private; (2) Give you this Notice of its legal duties and privacy practices concerning medical information about you; (3) Follow the terms of the Notice that are currently in effect and (4) Notify you in case there is a breach of your unsecured medical information.

HOW VITAE MAY USE AND DISCLOSE MEDICAL INFORMATION ABOUT YOU

The following categories describe different ways that Vitae may use or disclose protected medical information. For each category of uses and disclosures, Vitae will explain what is meant and may give some examples. Not every use or disclosure in a category will be listed. However, all of the ways Vitae is permitted to use and disclose information will fall within one of the categories. Some information is entitled to special restrictions.

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For Treatment. Vitae may use medical information about you to provide you with medical treatment and to coordinate or manage your medical treatment and any related services. Vitae may disclose information about you to staff of the skilled nursing facility, your attending physician, or other providers involved in your treatment. Vitae may also disclose your medical information to family members or other individuals involved in your continuing medical care. For example, Vitae may provide a specialist with access to your health information to assist the specialist in treating you.

For Payment. Vitae may use and disclose medical information about you so that Vitae can get paid for the treatment and services you receive at the skilled nursing facility. For example, Vitae may need to give information to your health plan or to the Medicaid or Medicare program about treatment you receive at the skilled nursing facility so that they will pay Vitae or reimburse you for your care. Vitae may also tell your health plan about a proposed treatment to determine whether your plan will cover the treatment.

For Health Care Operations. Vitae may use and disclose medical information about you to carry out activities that are necessary for its operations. These uses or disclosures are made for quality of care, compliance activities, administrative purposes, contractual obligations, grievances or lawsuits. For example, Vitae may use medical information to review treatment and services provided or to evaluate the performance of its healthcare providers in caring for you.

Directory. Vitae does not maintain a directory and will therefore not list any personal information about you in a directory or similar format.

To Individuals or Family Members Involved in Your Health Care. Unless you object, Vitae may disclose medical information about you to a member of your family, a relative, close friend or any other person that you identify who is involved in your care. Vitae may also tell your family or friends, personal representative, or any other person who is responsible for your care, of your location, general condition or death, unless you object.

Emergencies. Vitae may disclose medical information about you to a public or private entity assisting in disaster relief so that your family can be notified about your condition, status, or location. You may object to this disclosure with a written request. However, if you are not available or are unable to agree or object, or in some emergency circumstances, Vitae will use its professional judgment to decide whether this disclosure is in your best interest. If you would like to object to this disclosure, please contact privacy@vitaehs.com.

For Fundraising Activities. Vitae will not use medical information about you for sponsored activities including fundraising events.

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

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

For Public Health Activities. Vitae may disclose medical information about you for public health activities. These purposes generally include the following: (1) To prevent or control disease, injury, or disability; (2) To report deaths; (3) To report abuse or neglect of children, elders and dependent adults; (4) To report reactions to medications or problems with products;

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(5) To notify people of recalls of products they may be using; and (6) To notify a person who may have been exposed to a disease or who may be at risk for contracting or spreading a disease or condition.

For Health Oversight Activities. Vitae may disclose medical information about you to a health oversight agency for activities authorized by law.

For Lawsuits and Disputes. Vitae may disclose medical information about you in response to a court or administrative order, subpoena, discovery request, or other lawful process.

Disclosure to Law Enforcement. If asked to do so by law enforcement and as authorized or required by law, Vitae may release medical information: (1) To identify or locate a suspect, fugitive, material witness, or missing person; (2) About a suspected victim of a crime if, under certain limited circumstances, we are unable to obtain the person's agreement; (3) About a death suspected to be the result of criminal conduct; and (5) In case of a medical emergency, to report a crime, the location of the crime or victims, or the identity, description or location of the person who committed the crime.

Decedents. Vitae may release medical information about you to a coroner or medical examiner. This may be necessary, for example, to identify a deceased person or determine the cause of death. Vitae may also release medical information about you to funeral directors. Vitae may also release information to any individual known to the Facility as a family member, close personal friend of the family, or any other person identified, who was involved in your care or the payment for your care prior to your death, unless you indicate otherwise. Your medical information may be used or disclosed to others without your authorization after fifty (50) years from the date of your death.

For Specialized Government Functions. Vitae may disclose medical information about you to authorized federal officials for intelligence, counterintelligence, and other national security activities.

Information About Inmates/Individuals in Custody. If you are an inmate or under the custody of a law enforcement official, Vitae may release medical information about you to the correctional institution or law enforcement official responsible for you as authorized or required by law.

Disclosure For Threats to Health and Safety. In certain circumstances, Vitae may be required to disclose medical information to avert a serious threat to your health and safety or the health and safety of another person as required by law enforcement. The use or disclosure will be made in compliance with the law and will be limited to the relevant requirements of the law.

SPECIAL PROVISIONS RELATED TO PATIENT PRIVACY

Psychotherapy Notes. Vitae healthcare providers do not create psychotherapy notes in the course of their treatment.

Marketing. Vitae will not release your medical information for marketing purposes without an authorization from you.

Sale of Medical Information. Vitae will not sell your medical information without an authorization from you.

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YOUR RIGHTS

You have the following rights regarding your medical information. In order to exercise these rights, you must contact the Privacy Officer at Vitae. You may be asked to submit a written request. The Privacy Officer may be contacted using the following information:

Vitae Health Systems
Attn: Privacy Officer
303 E Wacker Suite 2102 Chicago, IL 60601
Phone: (312) 736-1776 Email: privacy@vitaehs.com

Right to Inspect and Copy. With certain exceptions, you have the right to inspect and receive copies of your medical information.

Amendment. If you feel that medical information about you is incorrect or incomplete, you may ask Vitae to amend the information.

Right to an Accounting of Disclosures. You have the right to receive a list of certain disclosures that Vitae has made of your medical information.

Right to Request Restrictions. You have the right to request a restriction or limitation on medical information that Vitae uses or discloses about you for treatment, payment or health care operations, and to request a limit on the medical information that Vitae may disclose to family members or friends involved in your care.

Request Confidential Communications. You have the right to request that Vitae communicate with you about your appointments or other matters related to your treatment in a specific way or at a specific location.

Receive a Copy. You have the right to obtain a copy of this notice.

CHANGES TO THIS NOTICE

Vitae reserves the right to change the terms of this Notice at any time. Vitae reserves the right to make the revised or changed notice effective for medical information Vitae already has about you as well as any information Vitae receives in the future. Vitae will post a copy of the current Notice on its website. The Notice will contain a last revised date to indicate when it became effective.

QUESTIONS AND COMPLAINTS

If you have any questions or believe that your privacy rights have been violated, you may contact the Privacy Officer by phone, email or mail a written summary of your concern to the address listed above. You may also file a written complaint with the Department of Health and Human Services at the following address:

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U.S. Department of Health and Human Services

Office for Civil Rights

Centralized Case Management Operations

200 Independence Ave., S.W.

Suite 515F, HHH Building

Washington, D.C. 20201

Phone: (800) 368-1019 Fax: (202) 619-3818

You will not be penalized or retaliated against for filing a complaint.

OTHER USES OF MEDICAL INFORMATION

Other uses and disclosures of medical information not covered by this Notice or the laws that apply to use will be made only with your written permission. If you provide Vitae permission to use or disclose medical information about you, you may revoke that permission in writing at any time. If you revoke your permission, Vitae will stop any further use or disclosure of your medical information for the purposes covered by your written authorization, except if Vitae has already acted in reliance on your permission. You understand that Vitae is unable to take back any disclosure it has already made with your permission and that Vitae is required to retain its records of the care that its healthcare providers have provided to you.