

## **PRIVACY POLICY**

It is the policy of our practice that all physicians and staff preserve the integrity and the confidentiality of protected health information (PHI) pertaining to our patients. The purpose of this policy is to ensure that our practice and its physician and staff have the necessary medical and PHI to provide the highest quality of medical care possible while protecting the confidentiality of the PHI of our patients to the highest degree possible. Patients should not fear about providing information to our practice and its physicians and staff or purposes of treatment, payment and healthcare operations (TPO). To that end, our practice and its physicians and staff will:

- Adhere to the standards set fourth in the Notice of Privacy Practices.
- Collect, use and disclose PHI only in conformance with state and federal laws and current patient covenants and/or authorizations, as appropriate. Our practice and its physicians and staff will not use or disclose PHI for uses outside of practice's TPO, such as marketing, employment, life insurance applications, etc. without an authorization from the patient.
- Use and disclose PHI to remind patients of their appointments only within their consent.
- Recognize that PHI collected about patients must be accurate, timely, complete and available when needed.
- Our practice and its physicians and staff will implement reasonable measures to protect the integrity of all PHI maintained about patients.
- Act as responsible information stewards and treat all PHI as sensitive and confidential. Consequently, our practice and its physicians and staff will: Treat all PHI data as confidential in accordance with professional ethics, accreditation standards, and legal requirements. Not disclose PHI data unless the patient (or his/her authorized representative) has properly consented to or authorized the release or the release is otherwise authorized by law.
- Recognize that, although our practice owns the medical record, the patient has the right to inspect and obtain a copy of his/her PHI. In addition, patients have the right to request and amendment to his/her medical records if he/she believes his/her information is inaccurate or incomplete. Our practice and its physicians and staff will—Permit patients access to their medical records when their written requests are approved by our practice. If we deny their request, then we must inform the patients that they may request a review of our denial. In such cases, we will have an on-site healthcare professional review the patients' appeals.
- Provide patients an opportunity to request the correction of inaccurate or incomplete PHI in their medical records in accordance with the law and professional standards. All physicians and staff of our practice will maintain a list of all disclosures of PHI for purposes other than TPO for each patient. We will provide this list the patients upon request, so long as their requests are in writing.
- All physicians and staff of our practice will adhere to any restrictions concerning the use or

disclosure of PHI that patients have requested and have been approved by our practice. All physicians and staff of our practice must adhere to this policy.

- Our practice will not tolerate violations of this policy. Violation of this policy is grounds for disciplinary action, up to and including termination of employment and criminal or professional sanctions in accordance with our practice's personnel rules and regulations.
- Our practice may change this privacy policy in the future. Any changes will be effective upon the release of a revised privacy policy and will be made available to patients upon request.

### **PRIVACY PROCEDURES**

Privacy Policy: Our practice recognizes and respects the fact that the patient has the right to inspect and obtain a copy of his/her Protected Health Information (PHI) Privacy Procedure to accomplish this Privacy Policy:

- The Privacy Officer will provide the front office staff with an original form for patients to complete when the patient desires to inspect and copy PHI.
- The front office staff will photocopy and make available to patients the form to inspect and copy PHI.
- The front office staff will respond to patients' requests and questions concerning inspecting and copying their PHI. In addition, the front office staff will distribute the form to the patients upon their request.
- Once the patient completes the form, the front office staff should forward the form to the privacy officer for review.
- Once the patient has submitted his/her request in writing, the front staff must verify that the patient's signature matches his/her signature on file.
- The Privacy Officer must review the patient's request and respond to the patient within 30 days from the date of the request. The Privacy Officer can request an additional 30-day extension as long as the request is made to the patient in writing with the reason for the delay clearly explained.
- The Privacy Officer should agree to all reasonable requests. If access is denied, the Privacy Officer must provide the patient with an explanation for the denial as well as a description of the patient's review appeal.
- When the patient has requested to inspect their PHI and his/her request has been accepted, the Privacy Officer or other authorized practice representative should accompany the patient to a private area to inspect his/her records. After the patient inspects the record, the Privacy Officer will note in the record the date and time of the inspection, and whether the patient made any requests for amendments or changes to the record.

- When the patient's request to copy his/her PHI has been accepted, the front office staff should copy his/her record within 14 days at a charge of \$1.00 per page.