

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

ABOUT THIS NOTICE

This Notice will tell you about the ways we may use and disclose health information about you. We also describe your rights and certain obligations we have regarding the use and disclosure of health information. We are required by law to:

- Maintain the privacy of protected health information
- Give you this Notice of our legal duties and privacy practices with respect to your health information
- Abide by the terms of the Notice currently in effect

ELECTRONIC HEALTH RECORDS

Middlebury Family Health uses an electronic health record to store and retrieve much of your health information. One of the advantages of our electronic health record is the ability to share and exchange health information among Middlebury Family Health's personnel and other community health care providers who are involved in your care. When Middlebury Family Health enters your information into the electronic health record, it may share that information by using shared clinical databases or health information exchanges. If you have any questions or concerns about the sharing or exchange of your information, please discuss them with your provider.

HOW WE MAY USE AND DISCLOSE HEALTH INFORMATION ABOUT YOU

The following categories describe different ways that we use and disclose health information. For each category of uses or disclosure we will explain what we mean and give examples.

- **For Treatment.** We may use health information about you to provide you with medical treatment or services and to send you appointment reminders. We may disclose health information about you to doctors, nurses, technicians, or other individuals who are involved in your care. Different departments of Middlebury Family Health also may share health information about you in order to coordinate the different services or items you need, such as prescriptions, lab work and x-rays.
- **For Payment.** We may use the disclosure health information about you to bill and collect payment from you, your insurance company or a third party payer. For example, we may need to give your insurance company information about your surgery so they will pay us or reimburse you for the treatment. We may also tell your health plan about the treatment you are going to receive to determine whether your plan will cover it.
- **For Healthcare Operations.** We may use and disclose health information about you for operations of Middlebury Family Health. These uses and disclosures are necessary to run Middlebury Family Health and make sure that all of our patients receive quality care. For example, we may use health information to evaluate the performance of our staff in caring for you. We may combine health information about many patients to evaluate the need for new services. We may disclose information to doctors, nurses, technicians and medical students and other Middlebury Family Health personnel for educational purposes. We may also disclose health information about you to other healthcare facilities as permitted by law.
- **Individuals Involved in Your Care or Payment for Your Care.** We may release relevant health information about you to friend or family member who is involved in your medical care or who helps pay for your care.

USES AND DISCLOSURES THAT ARE REQUIRED OR PERMITTED BY LAW

Subject to requirements of federal, state and local laws, we are either required or permitted to report your health information for various purposes. Some of these report requirements and permissions include:

- **Public Health Activities.** We may disclose your health information to public health officials for activities related to the prevention or control of communicable disease; to report suspected abuse, neglect or domestic violence or when required to avert a serious threat to health or safety.
- **Health Oversight Activities.** We may disclose your health information to a health oversight agency for activities authorized by law. These oversight activities include audits, investigations, inspections and licensure.
- **Judicial or Administrative Proceeding.** We may disclose your health information in response to a legal court or administrative order, a subpoena, discovery request, civil or criminal proceedings, or other lawful process, to the extent permissible under Vermont law.
- **Law Enforcement.** We may disclose your health information if asked to do so by a law enforcement official or pursuant to a warrant or court order to the extent permissible under Vermont law.
- **Coroners, Medical Examiners and Funeral Directors.** We may disclose health information to a coroner or a medical examiner. This may be necessary to identify a person who died or to determine the cause of death. We may disclose health information to help a funeral director carry out his/her duties.
- **Organ and Tissue Procurement.** We may disclose your health information to organizations that facilitate organ, eye or tissue procurement, banking or transplantation.
- **Research.** We may use or disclose your health information for research approved by an Institutional Review Board or Privacy Board that has reviewed the research proposal and established protocols to ensure the privacy of your health information.
- **Workers' Compensation.** We may disclose your health information as necessary to comply with workers' compensation laws.
- **Military.** If you are a member of the armed forces of the United States or another country, we may disclose health information about you as required by military command authorities.
- **National Security.** We may disclose your health information to federal official(s) for national security activities authorized by law.

YOUR RIGHTS REGARDING YOUR HEALTH INFORMATION

You have the following rights regarding your health information:

- **Right to inspect and Copy.** You have the right to inspect and copy health information that may be used to make decisions about your care. Usually this includes medical and billing records, but does not include psychotherapy notes. All requests to inspect and copy health information must be made in writing to Middlebury Family Health's Records Department. We may charge a fee for the costs of copying, mailing or other supplies associated with your request. Under very limited circumstances, we may deny your request to inspect or receive a copy of your health information. If you are denied access to your health information, you may request in writing the denial be reviewed. To request a review, contact Middlebury Family Health's Privacy Office. This contact information is listed on the last page of this Notice. A licensed healthcare professional chosen by Middlebury Family Health will conduct the review. The person conducting the review will not be the person who denied your request. We will comply with the decision of the reviewer.
- **Right to Amend.** You have the right to request an amendment to your health information that you believe is incorrect or incomplete. Submit your request in writing to Middlebury Family Health's

Privacy Office. The Privacy Office contact information is listed on the last page of this Notice. We may deny your request if we believe that the information that you would like to amend is accurate and complete or other circumstance apply. If your request for amendment is denied, you will be notified in writing of the reason for the denial.

- **Right to an Accounting of Disclosures.** You have the right to request an accounting of disclosures. This is a list of certain disclosures we make of your health information for purposes other than treatment, payment or health care operations. Submit your request in writing to Middlebury Family Health's Privacy Office. The Privacy Office information is listed below.
- **Right to Request Restrictions.** You have the right to request a restriction or limitation on how much of your health information we use or disclose for treatment, payment, or health care operations. You also have the right to request a restriction on the disclosure of your health information to someone who is involved in your care or payment for your care, such as a family member or friend. Submit your request in writing to Middlebury Family Health's Privacy Office. The Privacy Office contact information is listed below. We do not require a reason for the request. We are not required to agree to your request. However, if we do agree, we will comply with your request unless the information is needed to provide you with emergency treatment.
- **Right to Request Confidential Communications.** You have the right to request that we communicate with you about health care matters in a certain way or at a certain location. For example, you can ask that we only contact you at an alternative location from your home address, such as work, or only contact you by mail instead of phone. Your request must specify how or where you wish to be contacted. We do not require a reason for the request. We will accommodate all reasonable requests.
- **Right to Receive a Paper Copy of This Notice.** You have the right to a paper copy of this Notice. You may ask us to give you a copy of this Notice at any time. To obtain a paper copy of this Notice at any time contact the Privacy Office or the front desk area.

CHANGES TO THIS NOTICE

We may change the terms of this Notice at any time. If we change this Notice, we may make the new terms effective for all health information that we maintain including any information created or received prior to issuing the new Notice. You may obtain a new Notice at any time by contacting the Privacy Office or requesting a new copy at the front desk area. The Privacy Office contact information is listed below.

COMPLAINTS

If you believe your privacy rights have been violated, you may file a complaint with Porter or with the Secretary of Health and Human Services. To file a complaint with Middlebury Family Health, please call or write to the Privacy Office. This contact information is listed below. If you file a complaint, we will not take any action against you or change our treatment of you in any way.

FOR MORE INFORMATION OR FURTHER QUESTIONS PLEASE CONTACT:

The Privacy Office
Middlebury Family Health
Attn: Stacy Ladd, Manager
44 Collins Drive Suite 201
Middlebury, VT 05753
802-388-1500

Effective Date: 3/1/2013