

**Morrow Home Community
Notice of Privacy Practice**

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.

USE AND DISCLOSURE OF HEALTH INFORMATION

Morrow Home Community (MHC) may use your health information, that is, information that constitutes protected health information as defined in the Privacy Rule of Administrative Simplification provisions of the Health Insurance Portability and Accountability Act of 1996, for purposes of providing you treatment, obtaining payment for your care and conducting healthcare operations. MHC has established a policy to guard against unnecessary disclosure of your health information.

THE FOLLOWING IS A SUMMARY OF THE CIRCUMSTANCE UNDER WHICH AND PURPOSES FOR WHICH YOUR HEALTH INFORMATION MAY BE USED AND DISCLOSED WITHOUT YOUR WRITTEN CONSENT OR AUTHORIZATION:

1. **To provide treatment:** MHC may use your health information to provide care to you and disclose your health information to others who provide care to you, such as your attending physician and other health care professionals who are involved in your care. For example, physicians involved in your care will need information about your symptoms in order to prescribe appropriate medications. MHC also may disclose your health information to individuals outside of the facility involved in your care including family members, pharmacists, suppliers of medical equipment or other healthcare professionals.
2. **To obtain payment:** MHC may include your health information in invoices to collect payment from third parties for the care you may receive from MHC. For example, MHC may be required by your health insurer to provide information regarding your health status so that the insurer will reimburse you of the facility. MHC also may need to obtain prior approval from your insurer and may need to explain to the insurer your need for health care and services that will be provided to you.
3. **To conduct health care operations:** MHC may use and disclose health information for its own operations in order to facilitate the function of MHC and as necessary to provide quality care to all residents. Health care operations include activities such as:
 - Quality assessment and improvement activities.
 - Activities designed to improve health or reduce health care costs.
 - Protocol development, case management and care coordination.
 - Contacting health care providers and residents with information about treatment alternatives and other related functions that do not include treatment.
 - Professional review and performance evaluation.
 - Training programs including those in which students, trainees, or practitioners in health care learn under supervision.
 - Accreditation, certification, licensing or credentialing activities.

- Review and auditing, including compliance reviews, medical reviews, legal services and compliance programs.
- Business planning and development including cost management and planning related analyses and formulary development.
- Business management and general administrative activities of MHC.
- Fundraising for the benefit of MHC and certain marketing activities.
- Your picture used for marketing and special events.

For example, MHC may use your health information to evaluate its staff performance, combine your health information with other MHC residents in evaluating how to more effectively serve all of MHC's residents, disclose your health information to MHC staff and contracted personnel for training purposes, use your health information to contact you or your family as part of general fundraising and community information mailings (unless you tell us you do not want to be contacted).

4. **For the facility directory:** MHC may disclose certain information about you including your name and where you are located in the MHC directory while you are at MHC. We may disclose this information to people who ask for you by name. However, religious affiliation will only be disclosed to clergy and to volunteers to be used for the MHC church services. If you do not want MHC to include your information in the directory, you must notify Hilary Wolf, Health Information, at (608) 269-3168.
5. **For fundraising activities:** MHC may use information about you including your name, address, and telephone number to contact you or your family to raise money for MHC. If you do not want the facility to contact you or your family, you must notify Hilary Wolf, Health Information, at (608) 269-3168 and indicate that you do not wish to be contacted.
6. **For treatment alternatives:** MHC may use and disclose your health information to tell you about or recommend possible treatment options or alternatives that may be of interest to you.

The following is a summary of the circumstances under which and purposed for which your health information may be used and disclosed without your written consent or authorization:

1. **When legally required:** MHC will disclose your health information when it is required to do so by any Federal, State, or local law.
2. **When there are risks to public health:** MHC may disclose your health information for the following public activities and purposes:
 - To prevent or control disease, injury or disability, report disease, injury, vital events such as birth or death and the conduct of public health surveillance, investigations and interventions.
 - To report adverse events, product defects, to track products or enable product recalls, repairs and replacements and to conduct post-marketing surveillance and compliance with requirements of the Food and Drug Administration.
 - To notify a person who has been exposed to a communicable disease or who may be at risk of contracting or spreading a disease.
 - To an employer about an individual who is a member of the workforce as legally required.

3. **To report abuse, neglect, or domestic violence:** MHC is allowed to notify government authorities if MHC believes a resident is the victim of abuse, neglect, or domestic violence. MHC will make this disclosure only when specifically required or authorized by law or when the resident agrees to the disclosure.
4. **To conduct health oversight activities:** MHC may disclose your health information to a health oversight agency for activities including audits; civil, administrative or criminal investigations; inspections; licensure or disciplinary action. MHC, however, may not disclose your health information if you are the subject of an investigation and the investigation does not arise out of and is not directly related to your receipt of health care or public benefits.
5. **In connection with judicial and administrative proceedings:** As permitted or required by State law, MHC may disclose your health information in the course of any judicial or administrative proceeding in response to an order of a court or administrative tribunal as expressly authorized by such order or in response to a subpoena, discovery request or other lawful process, but only when MHC makes reasonable efforts to either notify you about the request or to obtain an order protecting your health information.
6. **For law enforcement purposes:** As permitted or required by State law, MHC may disclose your health information to a law enforcement official for certain law enforcement purposes, including, under certain limited circumstances, if you are a victim of a crime or in order to report a crime.
7. **To coroners and medical examiners:** MHC may disclose your health information to coroners and medical examiners for purposes of determining your cause of death or for other duties, as authorized by law.
8. **To funeral directors:** MHC may disclose your health information to funeral directors consistent with applicable law and if necessary, to carry out their duties with respect to your funeral arrangements. If necessary to carry out their duties, MHC may disclose your health information to and in reasonable anticipation of your death.
9. **For organ, eye or tissue donation:** MHC may use or disclose your health information to organ procurement organizations or other entities engaged in the procurement, banking or transplantation of organs, eyes, or tissue for the purpose of facilitating the donation and transplantation.
10. **For research purposes:** MHC may, under very select circumstances, use your health information for research. Before MHC discloses any of your health information for such research purposes, the project will be subject to an extensive approval process. MHC will almost always request your written authorization before granting access to your individually identifiable health information.
11. **In the event of a serious threat to health or safety:** MHC may, consistent with applicable law and ethical standards of conduct, disclose your health information if MHC, in good faith, believes that such disclosure is necessary to prevent or lessen a serious and imminent threat to your health or safety or to the health and safety of the public.
12. **For specified government functions:** In certain circumstances, the Federal regulations authorize MHC to use or disclose your health information to facilitate specified government functions relating to the military and veterans, national security and intelligence activities, protective

services for the President and others, medical suitability determinations and inmates and law enforcement custody.

13. **For worker's compensation:** MHC may release your health information for worker's compensation or similar programs.

AUTHORIZATION TO USE OF DISCLOSE HEALTH INFORMATION

Other than is stated above, MHC will not disclose your health information other than with your written authorization.

If you or your representative authorizes MHC to use or disclose your health information, you may revoke that authorization in writing at any time.

YOUR RIGHTS WITH RESPECT TO YOUR HEALTH INFORMATION

You have the following rights regarding your health information that MHC maintains:

1. **Right to request restrictions:** You may request restrictions on certain uses and disclosures of your health information. You have the right to request a limit on MHC's disclosure of your health information to someone who is involved in your care or the payment of your care. However, MHC is not required to agree to your request. If you wish to make a request for restrictions, please contact Hilary Wolf, Health Information, at (608) 269-3168.
2. **Right to receive confidential communications:** You have the right to request that MHC communicate with you in a certain way. For example, you may ask that MHC only conduct communications pertaining to your health information with you privately with no other family members present. If you wish to receive confidential communications, please contact Hilary Wolf, Health Information, at (608) 269-3168. MHC will not request that you provide any reasons for your request and will attempt to honor your reasonable requests for confidential communications.
3. **Right to inspect and copy your health information:** You may have the right to inspect and copy your health information, including billing records. A request to inspect and copy records containing your health information may be made to Hilary Wolf, Health Information, at (608) 269-3168. If you request a copy of your health information, MHC may charge a reasonable fee for copying and assembling costs associated with your request.
4. **Right to amend your health information:** You or your representative have the right to request that MHC amend your records, if you believe your health information records are incorrect or incomplete. That request may be made as long as the information is maintained by MHC. A request for amendment of records must be made in writing to Hilary Wolf, Health Information, at (608) 269-3168. MHC may deny the request if it is not in writing or does not include a reason for the amendment. The request also may be denied if your health information records were not created by MHC, if the records you are requesting are not part of MHC's records, if the health information you wish to amend is not part of the health information you or your representative

are permitted to inspect and copy, or if, in the opinion of MHC, the records containing your health information are accurate and complete.

5. **Right to an accounting:** You or your representatives have the right to request an accounting of disclosures of your health information made by MHC for any reason other than treatment, payment, or health operations. The request for an accounting must be made in writing to Hilary Wolf, Health Information, at (608) 269-3168. The request should specify the time period for the accounting starting on April 14, 2003. Accounting request may not be made for periods of time in excess of six (6) years. MHC will provide the first accounting you request during any 12-month period without charge. Subsequent accounting requests may be subject to a reasonable cost-based fee.
6. **Right to a paper copy of this notice:** You or your representatives have a right to a separate paper copy of this notice at any time even if you or your representatives have received this notice previously. To obtain a separate paper copy, please contact Hilary Wolf, Health Information, at (608) 269-3168. You or your representative may also obtain a copy of the current version of MHC's notice at our website, www.morrowhome.org

DUTIES OF FACILITY

MHC is required by law to maintain the privacy of your health information and to provide to you and your representative this Notice of its duties and privacy practices. MHC is required to abide by the terms of this Notice as it may be amended from time to time. MHC reserves the right to change the terms of its Notice and to make the new Notice provisions effective for all health information that it maintains. If MHC changes its Notice, MHC will provide a copy of the revised Notice to you or your appointed representative. You or your representatives have the right to express complaints to MHC and to the Secretary of Health and Human Services if you or your representatives believe that your privacy rights have been violated. Any complaints to MHC should be made in writing to Jen Brieske, Administrator, or Hilary Wolf, Health Information at (608) 269-3168.

MHC encourages you to express any concerns you may have regarding the privacy of your information. You will not be retaliated against in any way for filing a complaint.

CONTACT PERSONS

MHC has designated Hilary Wolf, Health Information, or Jen Brieske, Administrator as its contact persons for all issues regarding resident privacy and your rights under the Federal privacy standards. You may contact either Hilary or Jen at:

331 South Water Street

Sparta, WI 54656

Or

(608) 269-3168