

**SENIOR RESOURCE ALLIANCE  
NOTICE OF PRIVACY PRACTICES**

*Effective Date:* April 14, 2003

**THIS NOTICE OF PRIVACY PRACTICES ("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.**

If you have any questions about this Notice, please contact:

Name: Sarah Lightell  
Title: Privacy Officer  
Phone Number: 407-514-1800

**Section A: Who Will Follow This Notice?**

This Notice describes our practices and that of:

- Any health care professional authorized by this Corporation to enter information into your medical record.
- Any member of a volunteer group we allow to help you while you are receiving care from this Corporation.
- All our employees, staff and other personnel.

All of the following sites and locations follow the terms of this Notice. In addition, these sites and locations may share medical information with each other for treatment, payment or practice operations purposes described in this Notice. This list may not reflect recent acquisitions or sales of entities, sites, or locations.

**Section B: Our Pledge Regarding Medical Information.**

We understand that medical information about you and your health is personal. We are committed to protecting medical information about you. We create a record of the care and services you receive. We need this record to provide you with quality care and to comply with certain legal requirements. This Notice applies to all of the records of your care generated or maintained by this Corporation. Any medical institution, such as a hospital or nursing home at which we may treat you, may have different policies or Notices regarding that institution's use and disclosure of your medical information created in that institution.

This Notice will tell you about the ways in which we may use and disclose your medical information. This Notice also describes your rights and certain obligations we have regarding the use and disclosure of medical information.

We are required by law to:

- make sure that medical information that identifies you is kept private;
- give you this Notice of our legal duties and privacy practices with respect to your medical information; and
- follow the terms of the Notice that is currently in effect.

### **Section C: How We May Use and Disclose Your Medical Information**

The following categories describe different ways that we use and disclose medical information. For each category of uses or disclosures, we will explain what we mean and try to give some examples. Not every use or disclosure in a category will be listed. However, all of the ways we are permitted to use and disclose information will fall within one of the categories.

- **Treatment**. We may use medical information about you to provide you with medical treatment or services. We may disclose medical information about you to doctors, nurses, technicians, medical students, or other personnel in medical institutions such as a hospital or nursing home in which you receive care. For example, a doctor working for a hospital or for another physician practice who is treating you for a broken leg, may need to know if you have diabetes, because diabetes may slow the healing process. In addition, the doctor may need to tell the dietician if you have diabetes so that the hospital or nursing home can arrange for appropriate meals. We may share your medical information with different departments of a hospital or nursing home in order to coordinate the different things you need, such as prescriptions, lab work and x-rays. We also may disclose medical information about you to other people outside this Corporation who may be involved in your medical care, such as family members, clergy or others who provide services that are part of your care.
- **Payment**. We may use and disclose medical information about you so that the treatment and services you receive from this Corporation may be billed to, and payment may be collected from, you, an insurance company or a third party. For example, we may give your health plan information about a medical procedure that we performed for you, so your health plan will pay us or reimburse you for the procedure. We also may tell your health plan about a treatment you are going to receive in order to obtain prior approval or to determine whether your plan will cover the treatment.
- **Health Care Operations**. We may use and disclose medical information about you in order to operate this Corporation. These uses and disclosures are necessary to run this Corporation and to make sure that all of our patients receive quality care. For example, we may use medical information to review our treatment and services and to evaluate the performance of our staff in caring for you. We may combine medical information about other patients to decide what additional services we can offer, what services are not needed, and whether certain new treatments are effective. We may disclose information to doctors, nurses, technicians, medical students, and even personnel from other medical institutions such as a hospital or nursing home for review and learning purposes; and we may combine the medical information we have with medical information from other medical institutions such as hospitals, nursing homes, or other physician practices to compare how we are doing, and to see where we can make improvements in the care and services we offer. We also may remove information that identifies you from this set of medical information, so others may use it to study health care and health care delivery without learning who the specific patients are. We also may contact you as part of our fundraising efforts. All fundraising communications will include information about how you may opt out of future fundraising communications.

- Appointment Reminders. We may use and disclose medical information to contact you as a reminder that you have an appointment for treatment or medical care at this Corporation.
- Treatment Alternatives. We may use and disclose medical information to tell you about or recommend possible treatment options or alternatives that may be of interest to you.
- Health-Related Benefits and Services. We may use and disclose medical information to tell you about health-related benefits or services that may be of interest to you.
- Directory. We may include certain limited information about you in our directory. This information may include your name, location in the hospital, your general condition (e.g., fair, stable, etc.) and your religious affiliation. The directory information, except for your religious affiliation, may also be released to people who ask for you by name. Your religious affiliation may be given to a member of the clergy, such as a priest or rabbi, even if they do not ask for you by name. This is so your family, friends and clergy can visit you in the hospital and generally know how you are doing.
- Individuals Involved in Your Care or Payment for Your Care. We may release medical information about you to a friend or family member who is involved in your medical care. We also may give information to someone who helps pay for your care. We may tell your family or friends your condition and that you are in the hospital. In addition, we may disclose medical information about you to an entity assisting in a disaster relief effort, so your family can be notified about your condition, status and location.
- Research. Under certain circumstances, we may use and disclose medical information about you for research purposes. For example, a research project may involve comparing the health and recovery of all patients who received one medication to those who received another for the same condition. All research projects, however, are subject to a special approval process. This process evaluates a proposed research project and its use of medical information, trying to balance the research needs with the patients' need for privacy of their medical information. Before we use or disclose medical information for research, the project will have been approved through this research approval process. We may disclose medical information about you to people preparing to conduct a research project, for example, to help them look for patients with specific medical needs, so long as the medical information they review does not reveal the location where it was generated or maintained. We will generally ask for your specific permission if the researcher will have access to your name, address or other information that reveals who you are, or if the researcher will be involved in your care at our locations.
- As Required By Law. We will disclose medical information about you when required to do so by federal, state or local law.
- To Avert a Serious Threat to Health or Safety. We may use and disclose medical information about you when necessary to prevent a serious threat to your health or safety, or the health or safety of the public or another person. Any disclosure, however, would only be to someone able to help prevent the threat.

#### **Section D: Special Situations**

- Organ and Tissue Donation. If you are an organ donor, we may release medical information to organizations that handle organ procurement or organ, eye or tissue transplantation. We also may release medical information to an organ donation bank, as necessary to facilitate organ or tissue donation and transplantation.
- Military and Veterans. If you are a member of the armed forces, we may release medical information about you as required by military command authorities. We may also release

medical information about foreign military personnel to the appropriate foreign military authority.

- Workers' Compensation. We may release medical information about you for workers' compensation or similar programs. These programs provide benefits for work related injuries or illness.
- Public Health Risks. We may disclose medical information about you for public health activities. These activities generally include the following:
  - 1) to prevent or control disease, injury or disability;
  - 2) to report births and deaths;
  - 3) to report child abuse or neglect;
  - 4) to report reactions to medications or problems with products;
  - 5) to notify people of recalls of products they may be using;
  - 6) to notify a person who may have been exposed to a disease or may be at risk for contracting or spreading a disease or condition;
  - 7) to notify the appropriate government authority if we believe a patient has been the victim of abuse, neglect or domestic violence. We will only make this disclosure if you agree or when required or authorized by law.
- Health Oversight Activities. We may disclose medical information to a health oversight agency for activities authorized by law. These oversight activities include, for example, audits, investigations, inspections, and licensure. These activities are necessary for the government to monitor the health care system, government programs, and compliance with civil rights laws.
- Lawsuits and Disputes. If you are involved in a lawsuit or a dispute, we may disclose medical information about you in response to a court or administrative order. We may also disclose medical information about you in response to a subpoena, discovery request, or other lawful process by someone else involved in the dispute, but only if efforts have been made to tell you about the request or to obtain an order protecting the information requested.
- Law Enforcement. We may release medical information if asked to do so by a law enforcement official:
  - 1) In response to a court order, subpoena, warrant, summons or similar process;
  - 2) To identify or locate a suspect, fugitive, material witness, or missing person;
  - 3) About the victim of a crime if, under certain limited circumstances, we are unable to obtain the person's agreement;
  - 4) About a death we believe may be the result of criminal conduct;
  - 5) About criminal conduct at our facility or at the hospital; and
  - 6) In emergency circumstances, to report a crime, the location of the crime or the victims; or to report the identity, description or location of the person who committed the crime.
- Coroners, Medical Examiners and Funeral Directors. We may release medical information to a coroner or medical examiner. This may be necessary, for example, to identify a deceased person or to determine the cause of death. We also may release medical information about patients to funeral directors as necessary to carry out their duties.
- National Security and Intelligence Activities. We may release medical information about you to authorized federal officials for intelligence, counterintelligence, and other national security activities authorized by law.
- Protective Services for the President and Others. We may disclose medical information about you to authorized federal officials so they may provide protection to the President, other authorized persons or foreign heads of state or conduct special investigations.

## Section E: Your Rights Regarding Medical Information About You

You have the following rights regarding medical information we maintain about you:

- Right to Inspect and Copy. You have the right to inspect and copy some of the medical information that may be used to make decisions about your care. Usually, this includes medical and billing records, but does not include psychotherapy notes. If you request a copy of the information, we may charge a fee for the costs of copying, mailing or other supplies associated with your request.
- Denial. We may deny your request to inspect and copy medical information in certain circumstances. If you are denied access to medical information, in some cases, you may request that the denial be reviewed. Another licensed health care professional chosen by the Corporation will review your request and the denial. The person conducting the review will not be the person who denied your request. We will comply with the outcome of the review.
- Right to Amend. If you feel that medical information we have about you is incorrect or incomplete, you may ask us to amend the information. You have the right to request an amendment for as long as the information is kept by or for this Corporation. You must provide a reason that supports your request.
- Denial. We may deny your request for an amendment if it is not in writing or does not include a reason to support the request. In addition, we may deny your request if you ask us to amend information that:
  - 1) Was not created by us, unless the person or entity that created the information is no longer available to make the amendment;
  - 2) Is not part of the medical information kept by or for this Corporation;
  - 3) Is not part of the information which you would be permitted to inspect and copy; or
  - 4) Is accurate and complete.
- Right to an Accounting of Disclosures. You have the right to request an "accounting of disclosures." This is a list of the disclosures we made of medical information about you. Your request must state a time period, which may not be longer than six years and may not include dates before April 14, 2003. Your request should indicate in what form you want the list (for example, on paper, electronically). The first list you request within a 12 month period will be free. For additional lists, we may charge you for the costs of providing the list. We will notify you of the cost involved and you may choose to withdraw or modify your request at that time before any costs are incurred.
- Right to Request Restrictions. You have the right to request a restriction or limitation on the medical information we use or disclose about you for treatment, payment or health care operations. You also have the right to request a limit on the medical information we disclose about you to someone who is involved in your care, or the payment for your care (for example, a family member or friend). You also could request us not use or disclose information about a surgery you had. In your request, you must tell us what information you want to limit, whether you want to limit our use, disclosure, or both, and to whom you want the limits to apply (for example, disclosures to your spouse).
- We are not required to agree to your request. If we do agree, we will comply with your request unless the information is needed to provide you emergency treatment.
- Right to Request Confidential Communications. You have the right to request that we communicate with you about medical matters in a certain way or at a certain location. For example, you can ask that we only contact you at work or by mail. We will not ask you the

reason for your request. We will accommodate all reasonable requests. Your request must specify how or where you wish to be contacted.

- Right to 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. Even if you have agreed to receive this Notice electronically, you are still entitled to a paper copy of this Notice. You may obtain a copy of this Notice at our website, [www.seniorresourcealliance.org](http://www.seniorresourcealliance.org).

### **Section F: Changes To This Notice**

We reserve the right to change this Notice. We reserve the right to make the revised or changed Notice effective for medical information we already have about you as well as any information we receive in the future. We will post a copy of the current Notice in our offices. The Notice will contain on the first page, in the top right hand corner, the effective date. In addition, each time you register at or are admitted to the hospital for treatment or health care services from Senior Resource Alliance, we will offer you a copy of the current Notice in effect.

### **Section G: Complaints**

If you believe your privacy rights have been violated, you may file a complaint with us or with the Secretary of the U.S. Department of Health and Human Services. To file a complaint with us, contact the individual identified on the first page of this notice. All complaints must be submitted in writing. **You will not be penalized for filing a complaint.** The Secretary of the U.S. Department of Health and Human Services contact information is as follows:

Region IV, Office for Civil Rights  
U.S. Department of Health and Human Services  
Atlanta Federal Center  
Suite 3B70, 61 Forsyth Street, SW.  
Atlanta, GA 30303-8909  
Voice Phone: (404) 562-7886  
FAX: (404) 562-7881  
TDD: (404) 331-2867

### **Section H: Other Uses of Medical Information**

Other uses and disclosures of medical information not covered by this Notice or the laws that apply to us will be made only with your written permission. If you provide us permission to use or disclose medical information about you, you may revoke that permission, in writing, at any time. If you revoke your permission, we will no longer use or disclose medical information about you for the reasons covered by your written authorization. You understand that we are unable to take back any disclosures we have already made with your permission, and that we are required to retain our records of the care we provided to you.

### **Section I: Organized Health Care Arrangement**

Hospitals, the independent contractor members of the hospitals' Medical Staff (including your physician), and other health care providers affiliated with the hospitals have agreed, as permitted by law, to share your health information among themselves for purposes of treatment, payment or health care operations. This enables us to better address your health care needs.