



NOTICE OF PRIVACY PRACTICES

THIS NOTICE DESCRIBES HOW HEALTH INFORMATION ABOUT YOU MAY BE USED AND DISCLOSED, AND HOW YOU CAN GET ACCESS TO YOUR INDIVIDUALLY IDENTIFIABLE HEALTH INFORMATION. PLEASE REVIEW IT CAREFULLY.

A. OUR COMMITMENT TO YOUR PRIVACY

Project HOME is dedicated to maintaining the privacy of your protected health information (PHI). In conducting our business, we will create records regarding you and the treatment and services we provide to you. We are required by law to maintain the confidentiality of health information that identifies you. We also are required by law to provide you with this Notice of Privacy Practices (“Notice”) that we maintain in Project HOME concerning how we may use or disclose your PHI. By federal and state law, we must follow the terms of the Notice that we have in effect at the time.

We realize that these laws are complicated, but we must provide you with the following important information:

- How we may use and disclose your PHI
- Your privacy rights in your PHI
- Our obligations concerning the use and disclosure of your PHI

Changes to this Notice. The terms of this Notice apply to all records containing your PHI that are created or retained by Project HOME. We reserve the right to revise or amend this Notice. Any revision or amendment to this Notice will be effective for all of your records that Project HOME has created or maintained in the past, and for any of your records that we may create or maintain in the future. Project HOME will post a copy of our current Notice in our offices in a visible location at all times, and you may request a copy of our most current Notice at any time.

B. WHO TO CONTACT FOR FURTHER INFORMATION:

If you have questions about this Notice, requests or complaints related to the permitted or required uses and disclosure of your PHI by Project HOME and your rights with respect to your PHI to please contact:

Monica Medina McCurdy, Vice President, Healthcare Services and Privacy Officer, 1845 N. 23rd Street, Philadelphia, PA 19121, 215-235-3110 ext. 5614; or

Psychiatric Rehabilitation Services, attn: Gillian Raskin, 1515 Fairmount Avenue, Philadelphia, PA 19130.

C. WE MAY USE AND DISCLOSE YOUR INDIVIDUALLY IDENTIFIABLE HEALTH INFORMATION (PHI) IN THE FOLLOWING WAYS

The following categories describe the different ways in which we may use and disclose your PHI.

- 1. Treatment.** Many of the people who work for Project HOME – including, but not limited to, our doctors and nurses – may use or disclose your PHI in order to treat you or to assist others in your treatment. For example, we may ask you to have laboratory tests (such as blood or urine tests), and we may use the results to help us reach a diagnosis. We may use your PHI in order to write a prescription for you, or we might disclose your PHI to a pharmacy when we order a prescription for you.
- 2. Payment.** Project HOME may use and disclose your PHI in order so that we or others may bill and receive payment from you, an insurance company or a third party for the treatment and services you received. For example, we may contact your health insurer to certify that you are eligible for benefits (and for what range of benefits), and we may provide your insurer with details regarding your treatment to determine if your insurer will cover, or pay for, your treatment.
- 3. Health Care Operations.** Project HOME may use and disclose your PHI to operate our business. Project HOME may use your PHI to evaluate the quality of care you received from us, or to conduct cost-management and business planning activities for Project HOME. We may disclose your PHI to other health care providers and entities to assist in their health care operations.

4. Appointment Reminders. Project HOME may use and disclose your PHI to contact you and remind you of an appointment.

5. Treatment Options. Project HOME may use and disclose your PHI to inform you of potential treatment options or alternatives.

6. Health-Related Benefits and Services. Project HOME may use and disclose your PHI to inform you of health-related benefits or services that may be of interest to you.

7. Release of Information to Family/Friends. Project HOME may release your PHI to a friend or family member that is involved in your care, or who assists in taking care of you. For example, a parent or guardian may ask that a babysitter take a child to the pediatrician’s office for treatment of a cold. In this example, the babysitter may have access to this child’s medical information.

8. Disclosures Required By Law. Project HOME will use and disclose your PHI when we are required to do so by federal, state or local law.

D. USE AND DISCLOSURE OF YOUR PHI IN CERTAIN SPECIAL CIRCUMSTANCES

The following categories describe unique scenarios in which we may use or disclose your identifiable health information:

- 1. Business Associates.** We may share your PHI with certain business associates that perform services for us so that they can perform the job we have asked them to do. For example, we may use another company to perform billing services on our behalf. To protect your PHI, we require the business associate to appropriately safeguard the PHI.
- 2. Public Health Risks.** Project HOME may disclose Health Information for public health activities. These activities generally include disclosures to prevent or control disease, injury or disability; report births and deaths; report child abuse or neglect; report reactions to medications or problems with products; notify people of recalls of products they may be using; a person who may have been exposed to a disease or may be at risk for contracting or spreading a disease or condition; and the appropriate government authority if we believe a patient has been the victim of abuse, neglect or domestic violence.
- 3. Health Oversight Activities.** Project HOME may disclose your PHI to a health oversight agency for activities authorized by law. Oversight activities can include, for example, investigations, inspections, audits, surveys, licensure and disciplinary actions; civil, administrative, and criminal procedures or actions; or other activities necessary for the government to monitor government programs, compliance with civil rights laws and the health care system in general.
- 4. Lawsuits and Similar Proceedings.** Project HOME may use and disclose your PHI in response to a court or administrative order, if you are involved in a lawsuit or similar proceeding. We also may disclose your PHI in response to a discovery request, subpoena, or other lawful process by another party involved in the dispute, but only if we have made an effort to inform you of the request or to obtain a court or administrative order protecting the requested PHI.
- 5. Law Enforcement.** We may release PHI if asked to do so by a law enforcement official: (a) regarding a crime victim in certain situations, if we are unable to obtain the person’s agreement; (b) concerning a death we believe has resulted from criminal conduct; (c) regarding criminal conduct at our offices; (d) in response to a warrant, summons, court order, subpoena or similar legal process; (e) to identify/locate a suspect, material witness, fugitive or missing person; and (f) in an emergency, to report a crime (including the location or victim(s) of the crime, or the description, identity or location of the perpetrator).
- 6. Deceased Patients.** Project HOME may release PHI to a medical examiner or coroner to identify a deceased individual or to identify the cause of death. If necessary, we also may release information in order for funeral directors to perform their jobs.
- 7. Organ and Tissue Donation.** Project HOME may release your PHI to organizations that handle organ, eye or tissue procurement or transplantation, including organ donation banks, as necessary to

facilitate organ or tissue donation and transplantation if you are an organ donor.

8. Serious Threats to Health or Safety. Project HOME may use and disclose your PHI when necessary to reduce or prevent a serious threat to your health and safety or the health and safety of another individual or the public. Under these circumstances, we will only make disclosures to a person or organization able to help prevent the threat.

9. Military. Project HOME may disclose your PHI if you are a member of U.S. or foreign military forces (including veterans) and if required by the appropriate authorities.

10. National Security. Project HOME may disclose your PHI to federal officials for intelligence and national security activities authorized by law. We also may disclose your PHI to federal officials in order to protect the President, other officials or foreign heads of state, or to conduct investigations.

11. Inmates. Project HOME may disclose your PHI to correctional institutions or law enforcement officials if you are an inmate or under the custody of a law enforcement official. Disclosure for these purposes would be necessary: (a) for the institution to provide health care services to you, (b) for the safety and security of the institution, and/or (c) to protect your health and safety or the health and safety of other individuals.

12. Workers' Compensation. Project HOME may release your PHI for workers' compensation and similar programs.

E. YOUR RIGHTS REGARDING YOUR PHI

You have the following rights regarding the PHI that we maintain about you:

1. Confidential Communications. You have the right to request that Project HOME communicate with you about your health and related issues in a particular manner or at a certain location. For instance, you may ask that we contact you at home, rather than work. In order to request a type of confidential communication, you must make a written request the Privacy Officer or to Psychiatric Rehabilitation Services at the addresses listed at the beginning of this Notice, specifying the requested method of contact, or the location where you wish to be contacted. Project HOME will accommodate **reasonable** requests. You do not need to give a reason for your request.

2. Requesting Restrictions. You have the right to request a restriction in our use or disclosure of your PHI for treatment, payment or health care operations. Additionally, you have the right to request that we restrict our disclosure of your PHI to only certain individuals involved in your care or the payment for your care, such as family members and friends. **We are not required to agree to your request;** however, if we do agree, we are bound by our agreement except when otherwise required by law, in emergencies, or when the information is necessary to treat you. In order to request a restriction in our use or disclosure of your PHI, you must make your request in writing to the Privacy Officer or to Psychiatric Rehabilitation Services at the addresses listed at the beginning of this Notice. Your request must describe in a clear and concise fashion:

- (a) the information you wish restricted;
- (b) whether you are requesting to limit Project HOME's use, disclosure or both; and
- (c) to whom you want the limits to apply.

3. Inspection and Copies. You have the right to inspect and obtain a copy of the PHI that may be used to make decisions about you, including patient medical records and billing records, but not including psychotherapy notes. To inspect or copy PHI about you, you must submit your request in writing to the Privacy Officer or to Psychiatric Rehabilitation Services at the addresses listed at the beginning of this Notice. Project HOME may charge a fee for the costs of copying, mailing, labor and supplies associated with your request. Project HOME may deny your request to inspect and/or copy in certain limited circumstances; however, you may request a review of our denial. Another licensed health care professional chosen by us will conduct reviews.

4. Amendment. You may ask us to amend your health information if you believe it is incorrect or incomplete, and you may request an amendment for as long as the information is kept by or for Project HOME. To request an amendment, you must submit your request in writing to the Privacy Officer or to Psychiatric Rehabilitation Services at the addresses listed at the beginning of this Notice. You must provide us with a reason that

supports your request for amendment. Project HOME will deny your request if you fail to submit your request (and the reason supporting your request) in writing. Also, we may deny your request if you ask us to amend information that is in our opinion: (a) accurate and complete; (b) not part of the PHI kept by or for the practice; (c) not part of the PHI which you would be permitted to inspect and copy; or (d) not created by Project HOME, unless the individual or entity that created the information is not available to amend the information.

5. Accounting of Disclosures. All of our patients have the right to request a list of certain non-routine disclosures Project HOME has made of your PHI. This includes uses or disclosures for purposes other than treatment, payment, health care operations, disclosures made directly to you or for which you have provided written authorization. In order to obtain an accounting of disclosures, you must submit your request in writing to the Privacy Officer or to Psychiatric Rehabilitation Services at the addresses listed at the beginning of this Notice. All requests for an accounting of disclosures must state a time period, which may not be longer than six (6) years from the date of disclosure or include dates before April 14, 2003. Your first request within a 12-month period is free of charge, but Project HOME may charge you for additional lists within the same 12-month period. Project HOME will notify you of the costs involved with additional requests, and you may withdraw your request before you incur any costs.

6. Right to a Paper Copy of This Notice. You are entitled to receive a paper copy of the Notice, even if you have agreed to receive the Notice electronically. You may ask us to give you a copy of this Notice at any time. To obtain a paper copy of this Notice, contact the Privacy Officer or Psychiatric Rehabilitation Services at the addresses listed at the beginning of this Notice.

7. Right to File a Complaint. If you believe your privacy rights have been violated, you may file a complaint with Project HOME or with the Secretary of the Department of Health and Human Services. To file a complaint with Project HOME, contact the Privacy Officer or Psychiatric Rehabilitation Services at the addresses listed at the beginning of this Notice. All complaints must be submitted in writing. **You will not be penalized for filing a complaint.**

8. Right to Provide an Authorization for Other Uses and Disclosures. Project HOME will obtain your written authorization for uses and disclosures that are not identified by this Notice or permitted by applicable law. Your authorization is required for any use or disclosure of PHI for marketing communications or the sale of PHI that involves financial payment to Project HOME. You may revoke an authorization at any time in writing. After you revoke your authorization, we will no longer use or disclose your PHI for the purposes described in the authorization. Please note that we are required to retain records of your care.

9: State Laws on the Privacy of Certain Health Information. Pennsylvania provides special privacy protections for particularly sensitive conditions or illnesses such as HIV/AIDS, mental health, and substance abuse.

HIV/AIDS: We will not disclose any HIV- related information, except in situations where the subject of the information has provided us written consent allowing the release or where we are authorized or required by law to make the disclosure.

Mental Health: Any records related to involuntary mental health treatment (inpatient or outpatient) or voluntary inpatient treatment will not be disclosed without your written consent. Any mental health information disclosed will be limited to relevant information necessary for the purpose for which the information is sought.

Drug/Alcohol Abuse Treatment: We will not disclose any information related to drug and/or alcohol abuse treatment without your written authorization. Even with written authorization, we will only release such information under the following circumstances: (a) to medical personnel exclusively for the purposes of treatment or diagnosis; or (b) to government or other officials exclusively for the purpose of obtaining benefits due to you as a result of drug or alcohol abuse.

We may release information related to drug and/or alcohol abuse treatment under the following circumstances: (a) in emergency medical situations where your life is in immediate danger and the information is released solely for the purpose of providing medical treatment; and (b) in response to a court order.

F. EFFECTIVE DATE.

This Notice is effective as of September 25, 2013.