
NOTICE OF PRIVACY PRACTICE

HIPAA Privacy Officer: Bridget VandenBussche
200 N. Park Street, Kalamazoo, MI 49007 – (269) 373-7486
risk@wmcc.org
Effective 2/1/2021

YOUR INFORMATION. YOUR RIGHTS. YOUR RESPONSIBILITY.

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.

YOUR RIGHTS

When it comes to your health information, you have certain rights. This section explains those rights and our responsibilities. We will follow your instruction unless a law requires us to share that information.

1. Get an electronic or paper copy of your medical record
 - a. You can ask to see or get an electronic or paper copy of your medical record and other health information we have about you. Ask us how to do this.
 - b. We will provide a copy or a summary of your health information, usually within 30 days of your request. We may charge a reasonable, cost-based fee.
2. Ask us to correct your medical record
 - a. You can ask us to correct health information about you that you think is incorrect or incomplete. Ask us how to do this. We may say “no” to your request, but we will tell you why in writing within 60 days.
3. Request confidential communications
 - a. You can ask us to contact you in a specific way (for example, home or office phone) or to send mail to a different address. We will say “yes” to all reasonable requests.
4. Ask us what to limit what we use or share
 - a. You can ask us not to use or share certain health information for treatment, payment, or our operations. We are not required to agree to your request, and we may say “no” if it would affect your care.
 - b. If you pay for a service or health care item out-of-pocket in full, you can ask us not to share that information for the purpose of payment or our operations with your health insurer. We will say “yes” unless a law requires us to share that information.
5. Get a list of those with whom we have shared information
 - a. You can ask for a list (an accounting) of the times we have shared your health information for six years prior to the date you ask, who we shared it with, and why.
 - b. We will include all the disclosures except for those about treatment, payment, and health care operations, and certain other disclosures (such as any you asked us to make). We will provide one accounting a year for free but will charge a reasonable, cost-based fee if you ask for another one within 12 months.
6. Get a copy of this privacy notice
 - a. You can ask for a paper copy of this notice at any time, even if you have agreed to receive the notice electronically. We will provide you with a paper copy promptly.
7. Choose someone to act for you
 - a. If you have given someone medical power of attorney or if someone is your legal guardian, that person can exercise your rights and make choices about your health information.
 - b. We will make sure the person has this authority and can act for you before we take any action.

8. File a complaint if you feel your rights are violated
 - a. You can complain if you feel we have violated your rights by contacting the HIPAA Privacy Officer listed on page 1.
 - b. You can file a complaint with the U.S. Department of Health and Human Services Office for Civil Rights by sending a letter to 233 N. Michigan Ave., Suite 240, Chicago, IL 60601, calling 1-800-368-1019, or visiting www.hhs.gov/ocr/privacy/hipaa/complaints/. We will not retaliate against you for filing a complaint.

YOUR CHOICES

For certain health information, you can tell us your choices about what we share. If you have a clear preference for how we share your information in the situations described below, talk to us. Tell us what you want us to do, and we will follow your instructions.

1. In these cases, you have both the right and choice to tell us to:
 - a. Share Information with your family, close friends, or others involved with your care
 - b. Share contact information in a disaster relief situation
 - c. Contact you for fundraising efforts
2. If you are not able to tell us your preference, for example if you are unconscious, we may go ahead and share your information if we believe it is in your best interest. We may also share your information when needed to lessen a serious and imminent threat to health or safety.
 - a. In these cases we never share your information unless you give us written permission:
 - i. Marketing purposes
 - ii. Sale of your information
 - iii. Most sharing of psychotherapy notes

OUR USES AND DISCLOSURES

1. How do we typically use or share your health information?
 - a. Treat you- We can use your health information and share it with other professionals who are treating you. For Example: A doctor treating you asks another doctor about your overall health condition.
 - b. Run our organization- We can use and share your health information to run our practice, improve your care, and contact you when necessary. For Example: We use health information about you to manage your treatment and services.
 - c. Bill for your services- We can use and share your health information to bill and get payment from health plans or other entities. For Example: We give information about you to your health insurance plan so it will pay for your services.
2. How else can we use or share your health information? We are allowed or required to share your information in other ways – usually in ways that contribute to the public good, such as public health and research. We have to meet many conditions in the law before we can share your information for these purposes. For more information see:

<http://www.hhs.gov/ocr/privacy/hipaa/understanding/consumers/noticepp.html>

 - a. Help with public health and safety issues
 - b. Preventing disease
 - c. Helping with product recalls
 - d. Reporting adverse reactions to medications
 - e. Reporting suspected abuse, neglect, or domestic violence
 - f. Preventing or reducing a serious threat to anyone’s health or safety
 - g. Do health research
 - h. Quality improvement activities
 - i. For Example: Submit your information in a blinded format for accreditation purposes, quality improvement initiatives, etc.
 - i. Respond to organ and tissue donation requests from organ procurement organizations.

- j. Work with medical examiner, coroner and funeral directors when an individual dies.
- k. Comply with the law if state or federal laws require it
 - i. Department of Health and Human Services if it wants to see that we are complying with federal privacy law.
 - ii. For workers' compensation claims
 - iii. For law enforcement purposes or with a law enforcement official
 - iv. With health oversight agencies for activities authorized by law
 - v. For special government functions such as military, national security, and presidential protective services
 - vi. Respond to lawsuits and legal actions
 - vii. In response to a court or administrative order, or in response to a subpoena.
- l. Change of Ownership
 - i. If we are sold or merged with another organization, your health information will become the property of the new owner. You can request copies of your health information from the new owner.
- m. Appointments
 - i. We may use your health information to contact and remind you about appointments. If you are not home, we may leave this information on an answering machine or with the person answering the phone.
 - ii. Sign-In Sheet
 - iii. We may have you sign in when you arrive at our office. We may also call out your name when we are ready to see you.

OUR RESPONSIBILITIES

1. We are required by law to maintain the privacy and security of your protected health information.
2. We will let you know promptly if a breach occurs that may have compromised the privacy or security of your information.
3. We must follow the duties and privacy practices described in this notice and give you a copy of it.
4. We will not use or share your information other than as described here unless you tell us we can in writing.
5. If you tell us we can, you may change your mind at any time. Let us know in writing if you change your mind.
6. For more information see:
<http://www.hhs.gov/ocr/privacy/hipaa/understanding/consumers/noticepp.html>

CHANGES TO THE TERMS OF THIS NOTICE

We can change the terms of this notice, and the changes will apply to all information we have about you. The new notice will be available upon request, in our office, and on our web site.