



ST. PAUL ELDER SERVICES INC .
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. PLEASE REVIEW IT CAREFULLY.**

This notice applies to the following entities of St. Paul Elder Services, Inc.:

ST. PAUL HOME

RECOVERY INN

MEMORY CLINIC

**OTHER ST. PAUL ELDER SERVICES'
SPONSORED PROGRAMS/SERVICES**

ST. PAUL VILLA

ST. PAUL HOSPICE SERVICES

ST. PAUL OUTREACH SERVICES

For ease of reference, each of the entities listed above shall be referred to as SPES in this notice. You may receive this Notice at any of our SPES locations and serves as notice for all locations and entities.

SPES is required by applicable federal and state law to maintain the privacy of your health information. We are also required to give you this Notice about our privacy practices, our legal duties and your rights concerning your health information.

We reserve the right to change our privacy practices and the terms of this Notice at any time, provided such changes are permitted by applicable law. We reserve the right to make the changes in our privacy practices and the new terms of our Notice effective for all health information that we maintain, including health information we created or received before we made the changes. Before we make a significant change in our privacy practices, we will change this Notice and make the new Notice available upon request.

You may request a copy of our Notice at any time. For more information about our privacy practices or for additional copies of this Notice, please contact our Corporate Integrity Officer at 920-766-6020, extension 114 or e-mail kayf@stpaulelders.org.

HOW SPES MAY USE AND DISCLOSE YOUR HEALTH INFORMATION:

Treatment. SPES may use your health information to provide care to you and disclose your health information to others who provide care to you. For example, a nurse who is providing your care will report any changes in your condition to your physician. SPES may also disclose your health care information to individuals outside the organization involved in your care including family members, pharmacists, suppliers of medical equipment and/or other health care professionals. If another provider requests your health information and they are not providing care and treatment to you, we will request

an authorization from you prior to providing that information.

Payment. SPES may use or disclose your health information to bill and collect payment for the services we provide to you. For example, we may need to contact your insurance plan to confirm your coverage or to request prior approval for a planned treatment or service.

Health Care Operations. SPES may use or disclose your health care information for activities relating to the evaluation of patient care, evaluating the performance of health care providers, business planning and compliance with the law. These uses and disclosures help us to maintain and improve services provided. For example, we may use your health information to review the care you received and to evaluate the performance of our staff in caring for you. If the activities require disclosure outside of our health care organization, we will request your authorization before disclosing that information.

Contacting You. We may use and disclose health information to reach you about appointments and other matters and may contact you by mail, telephone or e-mail. If you want us to contact you in a certain way or at a certain location, see “Right to Receive Confidential Communications” on Page 4 of this Notice.

Fundraising. SPES may use your health information to contact you for fundraising purposes. For example, in order to provide and/or enhance our services offered to your community, we may want to raise additional money and therefore may contact you for a donation. You have the right to opt out of receiving fundraising communications at any time by contacting the Corporate Integrity Officer at 920-766-6020, ext. 114 or e-mailing kayf@stpauelders.org.

Treatment Alternatives. SPES 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.

Health Related Benefits and Services. SPES may use and disclose medical information about you to contact you about other health care benefits or services that may be of interest to you. If you do not wish to receive these communications, please notify the Corporate Integrity Officer at 920-766-6020, ext. 114 or e-mail kayf@stpauelders.org.

Directories, Medical Records and Room Nameplates. SPES may disclose certain information about you including your name and where you are located in our organizational directories during your stay with us. This information may be disclosed to people who ask for you by name. Information about you contained in our directory will not be disclosed to individuals not associated with SPES without your authorization. Your name and room number are listed on the outside of your medical record and in some cases your name will be listed outside your room to assist in identification of you to provide care to you.

If you do not want SPES to include your information in our directories or disclose this information to people who ask for you by name, you must notify the Corporate Integrity Officer at 920-766-6020, ext. 114 or e-mail kayf@stpauelders.org.

USE OR DISCLOSURES THAT ARE REQUIRED OR PERMITTED BY LAW

Legal Matters. SPES may disclose health information about you outside the organization when required to do so by federal, state or local law or by the court process.

Communicable Diseases/Public Health. SPES may disclose health information about you for public health reasons, like reporting deaths, reactions to medications or problems with medical products. We may release health information to help control the spread of disease or to notify a person(s) whose health or safety may be compromised.

Health Oversight Activities. SPES may disclose health information to a health oversight agency for activities authorized by law, such as audits, investigations, inspections and licensure.

Victims of Abuse, Neglect or Domestic Violence. SPES may disclose medical information about you to a government agency if we believe you are the victim of abuse, neglect or domestic violence.

Disaster Relief. SPES may use or disclose medical information about you to assist in disaster relief efforts. This will be done to notify family members or others of your location, general condition or death in the event of a natural or man-made disaster.

Law Enforcement Purposes. As permitted or required by law, SPES 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.

Activities Related to Death. SPES may disclose health information to coroners, medical examiners and funeral directors so they can carry out their duties related to death.

Organ, Eye or Tissue Donation. SPES 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 purposes of facilitating the donation and transplantation.

Research. SPES may, under very select circumstances, use your health information for research. Before SPES discloses any of your health information for such research purposes, the project is subject to an extensive approval process. SPES will almost always request your written authorization before granting access to your individually identifiable health information.

To Avoid a Serious Threat to Health or Safety. As required by law and standards of ethical conduct, we may release your health information to the proper authorities, if we believe, in good faith, that such disclosure is necessary to prevent or minimize a serious and approaching threat to you or the public's health or safety.

Military, National Security or Law Enforcement Custody. If you are involved in military, national security or intelligence activities or you are in the custody of law enforcement officials, we may disclose your health information to the proper authorities so they may carry out their duties under the law.

Worker's Compensation. SPES may disclose your health information to the appropriate persons in

order to comply with laws related to Worker's Compensation or other similar programs.

YOUR HEALTH INFORMATION RIGHTS

You have several rights with regard to your health information. If you wish to exercise any of the following rights, please contact the Corporate Integrity Officer at 920-766-6020, ext. 114 or e-mail kayf@stpaulelders.org. Specifically, you have the right to:

Right to Request Restrictions. You have the right to request restrictions on how your health information is used or to whom your information is disclosed, even if the restriction affects your treatment or our payment or health care operation activities. However, we are not required to agree in all circumstances if it is felt the restriction is not in your best interest and/or the request is unreasonable and would make provision of care impossible. In addition, you can restrict disclosures to a health plan concerning treatment or services provided to you which you have paid for out-of-pocket in full.

A Request for Restriction form can be obtained from the Corporate Integrity Officer. If your request is denied, efforts are made to assist you in modifying the request for restriction to accommodate your concerns and obtain agreement by SPES. Should you wish to terminate an active restriction, your request must be submitted in writing to the Corporate Integrity Officer.

Right to Receive Confidential Communications. You have the right to request that SPES communicate with you in a certain way. For example, you may ask that we 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 any staff member and/or the Corporate Integrity Officer. SPES will attempt to honor your request unless it imposes an unreasonable administrative burden or is contrary to your Plan of Care.

Right to Inspect and Copy your Health Information. You have the right to inspect and obtain a copy of your health information with a few exceptions. For example, this right does not apply to "psychotherapy notes" (information relating to mental health maintained separately from the medical record). SPES will provide you with access to your health information in the form or format you request (including an electronic form or format). If the form or format is not readily producible, then SPES will work with you to provide it in a reasonable electronic form or format, hard copy form or such other form or format as agreed to by both parties. We may charge a reasonable fee for the provision of the requested health information.

Right to Request Amendments to your Health Information. You have the right to ask us to amend your medical records if you feel that health information we have about you is incorrect or incomplete. Your request for amendment must be in writing, signed and dated and include the records you wish to amend and the reason(s) for supporting why the amendment should be accepted. When a request for amendment of health information is received, it is acted upon by SPES within sixty (60) days. A one-time extension of thirty (30) days is allowed if necessary. If an extension is necessary, SPES will notify you of the reason for the delay and the date by which you can expect action to be taken upon your request. SPES does not have to agree to the request; however, if we deny your request we will inform you in writing of the reason for denial.

Right to Receive a List of Disclosures of your Health Information. SPES will provide an accounting of disclosures of your health information for up to six (6) years prior to the date of your request. When a request for accounting of disclosures of health information is received, it is acted upon within thirty (30) days unless you agree to a 30-day extension. You may receive an accounting of disclosures at no charge once during any 12-month period. If you request an accounting more than once in any 12-month period, SPES may charge you a reasonable fee. This list will not include disclosures made to you, authorized by you, for purposes of treatment, payment, health care operations, organizational directories, national security, law enforcement, certain health oversight activities and certain other purposes.

Right to Obtain a Paper Copy of this Notice. Upon your request, you may at any time receive a paper copy of this notice, even if you previously agreed to receive this Notice electronically. To obtain a paper copy of this Notice at any time, please contact the Corporate Integrity Officer. A copy of SPES' current Notice of Privacy Practices can also be accessed via our website: www.stpaulelders.org.

DUTIES OF SPES

SPES will not use or disclose your health information without written authorization from you except as described within this Notice of Privacy Practices. For example, uses and disclosures made for the purposes of most psychotherapy, marketing and the sale of protected health information require your authorization. You may revoke your authorization in writing at any time. Upon revoking your authorization, SPES will no longer use or disclose health information about you for the reason(s) covered by your written authorization; however, SPES will be unable to take back any disclosures made with your permission prior to the revocation.

SPES is required by law to notify you following a breach of unsecured protected health information.

You or your legal representative has the right to express complaints in the following ways:

St. Paul Elder Services, Inc.

Mail: CIO, St. Paul Elder Services, 316 East 14th Street, Kaukauna WI 54130
Phone: 920-766-6020, ext. 114
E-Mail: kayf@stpaulelders.org.

U.S. Department of Health and Human Services Office for Civil Rights

Mail: 200 Independence Avenue, S.W., Washington, D.C. 20201
Phone: 1-877-696-6775
E-Mail: www.hhs.gov/ocr/privacy/hipaa/complaints/

You will not be retaliated against in any way for filing a complaint with SPES or with the U.S. Department of Health and Human Services Office for Civil Rights.

