

**Hospice of the Calumet Area, 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.**

**USE AND DISCLOSURE OF HEALTH INFORMATION**

**Hospice of the Calumet Area, Inc. [“HCA”]**, our business associates, and their subcontractors may use and disclose your protected health information to carry out treatment, payment, or health care operations and for other purposes that are permitted or required by law. “Protected Health Information” is information about you including demographic information, that may identify you and that relates to your past, present or future physical or mental health condition and related health care services. HCA has established policies to guard against unnecessary disclosure of your health information.

**THE FOLLOWING IS A SUMMARY OF THE CIRCUMSTANCES UNDER WHICH AND PURPOSES FOR WHICH YOUR HEALTH INFORMATION MAY BE USED AND DISCLOSED:**

**To Provide Treatment.** HCA may use your health information to coordinate care within HCA and with others involved in your care, such as your attending physician, members of the hospice interdisciplinary team and other health care professionals who have agreed to assist HCA in coordinating care. For example, physicians involved in your care will need information about your symptoms in order to prescribe appropriate medications. HCA also may disclose your health care information to individuals outside of HCA involved in your care including family members, clergy who you have designated, pharmacists, suppliers of medical equipment or other health care professionals and service agencies.

**To Obtain Payment.** HCA may include your health information in invoices to collect payment from third parties for the care you receive from HCA. For example, HCA may be required by your health insurer to provide information regarding your health care status so that the insurer will reimburse you or HCA. HCA also may need to obtain prior approval from your insurer and may need to explain to the insurer your need for hospice care and the services that will be provided to you.

**To Conduct Health Care Operations.** HCA may use and disclose health information for its own operations in order to facilitate the function of HCA and as necessary to provide quality care to all of HCA’s patients. Health care operations include such activities as:

- Quality assessment and improvement activities, including family satisfaction surveys.
- Activities designed to improve health or reduce health care costs.
- Protocol development, case management and care coordination.
- Contacting health care providers and patients 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.
- Training of non-health care professionals.
- 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 HCA.
- Fundraising for the benefit of HCA.

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

**For Patients at HCA's Hospice Residence.** HCA may disclose certain information about you including your name, your general health status, your religious affiliation and where you are in HCA's facility in a directory while you are in the Hospice Residence. HCA may disclose this information to people who ask for you by name. Please inform us if you do not want your information to be included in the directory.

**For Fundraising Activities.** HCA may use information about you including your name, address, phone number and the dates you received care in order to contact you or your family to raise money for HCA. If you do not want HCA to contact you or your family, notify our Director of Development at (219) 922-2732 or (708) 895-8332 and indicate that you do not wish to be contacted.

**For Appointment Reminders.** HCA may use and disclose your health information to contact you as a reminder that you have an appointment for a home visit.

**For Treatment Alternatives.** HCA 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 PURPOSES FOR WHICH YOUR HEALTH INFORMATION MAY ALSO BE USED AND DISCLOSED**

**When Legally Required.** HCA will disclose your health information when it is required to do so by any Federal, State or local law.

**When There Are Risks to Public Health.** HCA may disclose your health information for public activities and purposes in order to:

- Prevent or control disease, injury or disability, report disease, injury, vital events such as birth or death and conduct public health surveillance, investigations and interventions.
- 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.
- Notify a person who has been exposed to a communicable disease or who may be at risk of contracting or spreading a disease.
- Notify an employer about an individual who is a member of the workforce as legally required.

**To Report Abuse, Neglect Or Domestic Violence.** HCA is allowed to notify government authorities if HCA believes a patient is the victim of abuse, neglect or domestic violence. HCA will make this disclosure only when specifically required or authorized by law or when the patient agrees to the disclosure.

**To Conduct Health Oversight Activities.** HCA may disclose your health information to a health oversight agency for activities including audits, civil administrative or criminal investigations, inspections, licensure or disciplinary action. HCA, however, may not disclose your health information if you are the subject of an investigation and your health information is not directly related to your receipt of health care or public benefits.

**In Connection With Judicial and Administrative Proceedings.** HCA 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, only when HCA receives satisfactory assurances that reasonable efforts to either notify you about the request or to obtain an order protecting your health information have been made by the party seeking the information.

**For Law Enforcement Purposes.** As permitted or required by State law, HCA may disclose your health information to a law enforcement official for certain law enforcement purposes as follows:

- As required by law for reporting of certain types of wounds or other physical injuries pursuant to the court order, warrant, subpoena or summons or similar process.
- For the purpose of identifying or locating a suspect, fugitive, material witness or missing person.
- Under certain limited circumstances, when you are the victim of a crime.
- To a law enforcement official if HCA has a suspicion that your death was the result of criminal conduct including criminal conduct at HCA.
- In an emergency in order to report a crime.

**To Coroners and Medical Examiners.** HCA 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.

**To Funeral Directors.** HCA 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, HCA may disclose your health information prior to and in reasonable anticipation of your death.

**For Organ, Eye or Tissue Donation.** HCA 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.

**For Research Purposes.** HCA may, under very select circumstances, use your health information for research. Before HCA discloses any of your health information for such research purposes, the project will be subject to an extensive approval process.

**In the Event of a Serious Threat to Health or Safety.** HCA may, consistent with applicable law and ethical standards of conduct, disclose your health information if HCA, 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.

**For Specified Government Functions.** In certain circumstances, the Federal regulations authorize HCA to use or disclose your health information to facilitate specified government functions relating to military and veterans, national security and intelligence activities, protective services for the President and others, medical suitability determinations and inmates and law enforcement custody.

**For Worker's Compensation.** HCA may release your health information for worker's compensation or similar programs.

## **USES AND DISCLOSURES THAT REQUIRE YOUR AUTHORIZATION**

Other than is stated above, HCA will not disclose your health information other than with your written authorization. HCA would need your written authorization to use or disclose your protected health information for marketing purposes, for most uses or disclosures of psychotherapy notes, or if we intended to sell your protected health information. If you or your representative authorizes HCA 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 HCA maintains:

- **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 HCA's disclosure of your health information to someone who is involved in your care or the payment of your care. However, HCA is not required to agree to your request except for disclosures to a health plan with respect to a treatment or service that you or someone on your behalf paid for in full, out of pocket. If you wish to make a request for restrictions, please contact the Patient Care Coordinator at (219) 922-2732 or (708) 895-8332.
- **Right to receive confidential communications.** You have the right to request that HCA communicate with you in a certain way. For example, you may ask that HCA 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 the Patient Care Coordinator at (219) 922-2732 or (708) 895-8332. HCA will not request that you provide any reasons for your request and will attempt to honor your reasonable requests for confidential communications.
- **Right to inspect and copy your health information.** You have the right to inspect and copy your health information, including billing records. If your health information is maintained electronically, you also have the right to request a copy in electronic format. A request to inspect and copy records containing your health information may be made to the Patient Care Coordinator at (219) 922-2732 or (708) 895-8332. If you request a copy of your health information, HCA may charge a reasonable fee for copying and assembling costs associated with your request.
- **Right to amend health care information.** You or your representative have the right to request that HCA amend your records, if you believe that your health information is incorrect or incomplete. That request may be made as long as the information is maintained by HCA. A request for an amendment of records must be made in writing to the Patient Care Coordinator at (219) 922-2732 or (708) 895-8332. HCA 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 HCA, if the records you are requesting are not part of HCA'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 HCA, the records containing your health information are accurate and complete.
- **Right to an accounting.** You or your representative have the right to request an accounting of disclosures of your health information made by HCA for certain reasons, including reasons related to public purposes authorized by law and certain research. The request for an accounting must be made in writing to the Patient Care Coordinator at (219) 922-2732 or (708) 895-8332. The request should specify the time period for the accounting starting on or after April 14, 2003. Accounting requests may not be made for periods of time in excess of six (6) years. HCA would 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.
- **Right to receive notice of a breach.** HCA will notify you if your unsecured protected health information has been breached.

- **Right to a paper copy of this notice.** You or your representative have a right to a separate paper copy of this Notice at any time even if you or your representative have received this Notice previously. To obtain a separate paper copy, please contact the Patient Care Coordinator at (219) 922-2732 or (708) 895-8332. You or your representative may also obtain a copy of the current version of HCA's Notice of Privacy Practices on our website, [www.hospicecalumet.org](http://www.hospicecalumet.org).

### **DUTIES OF HOSPICE OF THE CALUMET AREA, INC.**

HCA 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. HCA is required to abide by the terms of this Notice as may be amended from time to time. HCA 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. You or your personal representative have the right to express complaints to HCA and to the Secretary of DHHS if you or your representative believe that your privacy rights have been violated. Any complaints to HCA should be made in writing to the Privacy Official. HCA 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 PERSON**

Hospice of the Calumet Area has designated the Privacy Official as its contact person for all issues regarding patient privacy and your rights under the Federal privacy standards. You may contact this person at:

**Hospice of the Calumet Area, Inc.  
Privacy Official  
600 Superior Avenue  
Munster, IN 46321  
(219) 922-2732**

**Hospice of the Calumet Area, Inc.  
Privacy Official  
3224 Ridge Road, Suite 202 & 203  
Lansing, IL 60438  
(708) 895-8332**

This Notice is effective April 14, 2003, revised 9/23/2013.

**IF YOU HAVE ANY QUESTIONS REGARDING THIS NOTICE, PLEASE CONTACT THE PRIVACY OFFICIAL.**