

HALIFAX COMMUNITY COLLEGE DENTAL HYGIENE CLINIC'S NOTICE OF PRIVACY PRACTICES

This notice describes how medical/dental information about you may be used and disclosed and how you can get access to this information. Please review it carefully.

This Notice is provided to you as a requirement of the Health Insurance Portability and Accountability Act (HIPAA). HIPAA required that we protect the privacy of health information that identifies a patient. This Notice describes your rights as our patient and our obligations regarding the use and disclosure of medical and billing information.

Halifax Community College (HCC) Dental Hygiene Clinic's Responsibility

HCC Dental Hygiene Clinic is required to:

- ❖ Maintain the privacy of your health information.
- ❖ Provide you with a notice as to our legal duties and privacy practices with respect to the information we collect and maintain about you.
- ❖ Abide by the terms of this notice.
- ❖ Accommodate reasonable requests you may have made to communicate health information by alternative means or at alternative locations.
- ❖ Notify you if we are unable to agree to a requested restriction or amendment to your record.

HCC Dental Hygiene Clinic reserves the right to change our practices and to make the new provisions effective for all protected health information we maintain, as well as any information we receive in the future. Should our privacy practices change, we will post a notice of change in designated areas and on the HCC website at www.halifaxcc.edu. The change to the policy will be available to you upon your request from the Privacy Officer or designee.

How We May Use or Disclose Your Medical/Dental Information

Following are examples of permitted uses and disclosures of medical/dental information about you. This list does not include every type of use or disclosure that may be within that category.

HCC Dental Hygiene Clinic will use your health information for treatment.

We may use and disclose information about you to provide, coordinate, or manage your health care and related services. We may consult with other health care providers regarding your treatment and coordinate and manage your health care with others. We may also use or disclose information about you when referring you to another healthcare provider. In emergencies, we will use or disclose information to provide the treatment you require. We will only disclose information about you to people outside of HCC Dental Hygiene Clinic regarding your current treatment with your consent, or if such disclosures are required or permitted by law.

HCC Dental Hygiene Clinic will not use your health information for payment.

We do not use or disclose information about you so that we can bill and collect payment for the treatment and services provided to you. Before providing treatment or services, we will share details with you regarding fees for services and collection/payment of those fees.

HCC Dental Hygiene Clinic will use your health information for regular healthcare operations.

Members of the HCC Dental Hygiene Clinic staff and /or faculty or their designee may use information in your health record to assess care and outcomes in your case and others like it. This information will then be used in an effort to continually improve the quality and effectiveness of healthcare and services provided by the HCC Dental Hygiene Clinic. We will only disclose medical/dental information about you that identifies you to people outside of HCC Dental Hygiene Clinic who are involved in clinic operations with your consent or if such disclosures are required or permitted by law.

Communications from our Office/Marketing: HCC Dental Hygiene Clinic may send postcard reminders for scheduled appointments. We may also call you at home or at work to remind you of an appointment. Both the postcards and calls will contain the minimum information necessary, using our best judgment, to accomplish their intended purpose. Additionally, we may use or disclose information to notify or assist in notifying a family member, personal representative, or another person responsible for your care, your location, and general condition. We may also contact you with information about treatment alternatives or other health-related benefits and services of interest to you.

Communications with Family: Staff, students, and faculty, using their best judgement, may disclose to a family member or other relative, close personal friend, or any other person you identify, health information relevant to your care or payment related to your care, unless you object.

Required by HIPAA Privacy Rule: We are required to disclose medical/dental information to the Secretary of the United States Department of Health and Human Services when requested by the Secretary to review our compliance with the Privacy Rule.

Required by Law: HCC Dental Hygiene Clinic may use or disclose medical/dental information as required by federal, state, or local law.

Public Health: As required by law, HCC Dental Hygiene Clinic may disclose health information to public health or legal authorities to carry out certain activities related to public health such as:

- ❖ Prevent or control disease, injury, or disability.
- ❖ Report births and deaths.
- ❖ Report child abuse or neglect.
- ❖ Report reactions to medications or problems with products or devices regulated by the federal Food and Drug Administration or other activities related to quality, safety, or effectiveness of FDA-regulated products or activities.
- ❖ Notify a person who may have been exposed to a communicable disease or may be at risk for contracting or spreading a disease or condition.
- ❖ Report to your employer, under limited circumstances, information related primarily to workplace injuries or illness, or workplace medical/dental surveillance.

Abuse, Neglect, or Domestic Violence: HCC Dental Hygiene Clinic may disclose medical/dental information to a government authority such as the Department of Social Services, if we reasonable believe you may be a victim of abuse, neglect, or domestic violence.

Health Oversight Activities: HCC Dental Hygiene Clinic may disclose medical/dental information for oversight activities including audits, investigations, inspections, licensure, and disciplinary activities conducted to monitor the health care system, government benefit programs, and compliance with certain laws.

Legal Proceedings: HCC Dental Hygiene Clinic may disclose medical/dental information in response to subpoenas, discovery requests, or other lawful process.

Law Enforcement: HCC Dental Hygiene Clinic may disclose medical/dental information for law enforcement purposes, such as responses to legal proceedings and death suspected from criminal conduct. However, we will not release your information if you seek treatment for drug dependence from one of our practitioners without your authorization or a court order.

Coroners, Medical Examiners, and Funeral Directors: HCC Dental Hygiene Clinic may disclose health information to: coroners and medical examiners to identify a deceased person or determine the cause of death; funeral directors consistent with applicable law to carry out their duties.

Organ Procurement Organizations: Consistent with applicable law, HCC Dental Hygiene Clinic may disclose health information to organ procurement organizations or other entities engaged in the procurement, banking or transplantation of organs for the purpose of tissue donation and transplantation. If you are an organ or tissue donor, we are also required by law to provide medical/dental information about you after your death to the person or entity that receives the organ or tissue donation.

Research: HCC Dental Hygiene Clinic may disclose information to researchers when an institutional review board that has reviewed the research proposal and established protocols to ensure the privacy of your health information has approved the research. All research projects, where the researchers know who you are, will require your written consent.

To Avert a Serious Threat to Health and Safety: HCC Dental Hygiene Clinic may disclose medical/dental information about you when necessary to prevent a threat to the health or safety of a person or to the public, and the disclosure is to a person or persons reasonable able to prevent or lessen the threat.

Specialized Government Functions: We may disclose medical/health information for military and veterans' activities, national security, and intelligence activities. In addition, we may also disclose health information to a correctional institution in some circumstances.

Worker's Compensation: HCC Dental Hygiene Clinic may disclose health information to the extent authorized by and to the extent necessary to comply with laws relating to worker's compensation or other similar programs established by law.

Authorizations: Any uses or disclosures not covered by the HIPAA Privacy Rule will require a signed authorization by the patient.

Your Health Information Rights:

Although your health record is the physical property of HCC Dental Hygiene Clinic, you have the right to:

- ❖ Request, in writing a restriction on certain uses and disclosures of your information. Examples of restrictions may include use or disclosure to family members, relatives, close personal friends, and/or any others identified by the patient or for treatment, payment, and health care operations. Your request will be reviewed and will inform you in writing within 30 days of our final decision.
However, we are not required to agree to any of your requests.
- ❖ Obtain a paper copy of the Notice of Privacy Practices upon request.
- ❖ Request, in writing, to inspect and/or copy your medical and billing information. Your request will be reviewed and we will inform you in writing within 30 days of our decision. HCC Dental Hygiene Clinic may deny access to the information for the following reasons: it is needed for legal proceedings; it contains psychotherapy notes; a licensed health care professional determines it will be injurious to your well-being. If your request is denied, you can request a review of the decision in

certain instances. Our Compliance Officer will then review the denial and either agree with the denial or grant access. If you are granted access at any point in the process, there may be a fee for copying.

- ❖ Request, in writing, to amend your health record and provide a reason for your request. Your request will be reviewed and we will inform you in writing within 30 days of our decision. If we accept your request, we will make reasonable efforts to inform others of the amendment. However, we may deny your request for the following reasons: the information was not created by HCC Dental Hygiene Clinic; it is not a part of the designated record set, it is not accessible due to State or Federal law; it is complete and accurate; it is unavailable until clinical studies/trials are complete. If your request is denied, you can submit a statement of disagreement to our Compliance Officer, who will review the denial and either concur with the denial or agree to the amendment.
- ❖ Request, in writing, to obtain an accounting of disclosures of your health information except for treatment, payment, and health care operations; made to or requested by you; and communications from our office and with your family. The accounting will include disclosures that occurred during the six years prior to the date of request, but no earlier than the Privacy Rule compliance date of April 14, 2003. The first request in a 12-month period is free and any additional requests within the same 12-month period may result in a fee.
- ❖ Request, in writing, communications of your health information by alternative means or at alternative locations. We must accommodate reasonable requests, but when appropriate, may require you to provide us with an alternative address or other method of contact.
- ❖ Revoke, in writing, your authorization to use or disclose health information except to the extent that action has already been taken.

Privacy Rights of Minors: State Law allows an unemancipated minor to provide consent, in lieu of a parent or guardian, for the prevention, diagnosis, and treatment of certain health care services including: sexually transmitted disease, pregnancy, substance abuse, and emotional disturbance.

For More Information or to Report a Problem

If you believe your privacy rights have been violated, you can file a complaint with the HCC Dental Hygiene Clinic Manager at (252) 536-7219 or with the Secretary of Health and Human Services. If you have questions and would like additional information, you may contact the Clinic Manager at (252) 536-7219. HCC Dental Hygiene Clinic will not retaliate for the filing of a complaint with the clinic or the Secretary of the Department of HHS.

Effective: 8/15/03