

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.

If you have any questions about this notice, please call Project Access NOW at 503 345 6553.

WHO WILL FOLLOW THIS NOTICE

This notice describes the information privacy practices followed by our employees, staff, volunteers and other office personnel.

The HIPAA Privacy Rule requires Project Access NOW make available a Notice of Privacy Practices to all patients and clients. This is Project Access NOW's formal Notice. The purpose of the Notice is to inform you of your privacy rights, Project Access NOW's privacy policies and practices and how Project Access NOW may use and share your health information.

Project Access NOW has the right to change the Notice at any time. If any significant changes are made to the Notice, Project Access NOW will notify patients and clients that changes have been made to the Notice. Notice of changes may include an update in a Project Access NOW newsletter or a posted announcement on Project Access NOW's Web site. An electronic copy of this Notice is available to download from Project Access NOW's Web site. Upon request, you are entitled to a paper copy of this Notice.

YOUR HEALTH INFORMATION

This notice applies to the information and records we have about you, your health, health status, and the health care and services you receive from health care professionals affiliated with Project Access NOW. Your health information may include information created and received by this office, may be in the form of written or electronic records or spoken words, and may include information about your health history, health status, symptoms, examinations, test results, diagnoses, treatments, procedures, prescriptions, related billing activity and similar types of health-related information.

We are required by law to give you this notice. It will tell you about the ways in which we may use and disclose health information about you and describes your rights and our obligations regarding the use and disclosure of that information.

HOW WE MAY USE AND DISCLOSE HEALTH INFORMATION ABOUT YOU

We may use and disclose health information for the following purposes:

- **For Treatment.** We may use health information about you to assist our affiliated health care professionals provide you with medical treatment or services. We may disclose health information about you to doctors, nurses, technicians, office staff or other personnel who are involved in taking care of you and your health.

For example, your doctor may be treating you for a heart condition and may need to know if you have other health problems that could complicate your treatment. The doctor may use your medical history to decide what treatment is best for you. The doctor may also tell another doctor about your condition so that doctor can help determine the most appropriate care for you.

Different personnel in our office may share information about you and disclose information to people who do not work in our office in order to coordinate your care, such as coordinating care between affiliated providers, evaluating appropriate treatment necessary for

quality health care for you and scheduling appointments with affiliated health care professionals. Family members and other health care providers may be part of your medical care outside this office and may require information about you that we have.

We will request your permission before sharing health information with your family or friends unless you are unable to give permission to such disclosures due to your health condition or availability and in our best judgment sharing your health information is necessary to provide you quality care. You will be given an opportunity to object to such releases at the time you are able and/or available to object to releases of your health information to friends and/or family.

- **For payment.** We may use and disclose health information about you so that the treatment and services you receive from affiliated health care professionals may be billed to and payment may be collected from you, an insurance company or a third party.

For example, we may need to give your health plan information about a service you received from a Project Access NOW affiliated health care professional so your health plan will pay our affiliated health care professionals or reimburse you for the service. We may also tell your health plan about a treatment you are going to receive to obtain prior approval or to determine whether your plan will pay for the treatment, if applicable.

- **For Health Care Operations.** We may use and disclose health information about you in order to run the office and make sure that you and our other patients receive quality care.

For example, we may use your health information to evaluate the performance of our affiliated health care professionals in caring for you. We may also use health information about all or many of our patients or clients to help our affiliated health care professionals decide what additional services we should offer and how we can become more efficient.

We may also disclose your health information to health plans that provide you insurance coverage and other health care providers that care for you. Our disclosures of your health information to plans and other providers may be for the purpose of helping these plans and providers provide or improve care, reduce cost, coordinate and manage health care and services, train staff and comply with the law.

- **Appointment Reminders.** We may contact you as a reminder that you have an appointment for treatment or medical care.
- **Treatment Alternatives.** We may tell you about or recommend possible treatment options or alternatives that may be of interest to you. If at any time you do not wish to receive such information, if you provide notice in writing, we will make every effort to work with our affiliated health care professionals not provide such information in the future.
- **Health-Related Products and Services.** We may tell you about health-related products or services that may be of interest.

Please notify us if you do not wish to be contacted for appointment reminders, or if you do not wish to receive communications about treatment alternatives or health-related products and services. If you advise

us in writing, send the request to the address listed in this Notice.

SPECIAL SITUATIONS

We may use or disclose health information about you for the following purposes, subject to all applicable legal requirements and limitations:

- **To Avert a Serious Threat to Health or Safety.** We may use and disclose health information about you when necessary to prevent a serious threat to your health and safety or the health and safety of the public or another person.
- **Required By Law.** We will disclose health information about you when required to do so by federal, state or local law.
- **Research.** We may use and disclose health information about you for research projects that are subject to a special approval process. We will ask you for your permission if the researcher will have access to your name, address or other information that reveals who you are, or will be involved in your care at the office. We will offer you the option of opting out of any research related to genetic studies.
- **Organ and Tissue Donation.** If you are an organ donor, we may release health information to organizations that handle organ procurement or organ, eye or tissue transplantation or to an organ donation bank, as necessary to facilitate such donation and transplantation.
- **Military, Veterans, National Security and Intelligence.** If you are or were a member of the armed forces, or part of the national security or intelligence communities, we may be required by military command or other government authorities to release health information about you. We may also release information about foreign military personnel to the appropriate foreign military authority.
- **Workers' Compensation.** We may release health information about you for workers' compensation or similar programs. These programs provide benefits for work-related injuries or illness.
- **Public Health Risks.** We may disclose health information about you for public health reasons in order to prevent or control disease, injury or disability; or report births, deaths, suspected abuse or neglect, non-accidental physical injuries, reactions to medications or problems with products.
- **Health Oversight Activities.** We may disclose health information to a health oversight agency for audits, investigations, inspections, or licensing purposes. These disclosures may be necessary for certain state and federal agencies to monitor the health care system, government programs, and compliance with civil rights laws.
- **Lawsuits and Disputes.** If you are involved in a lawsuit or a dispute, we may disclose health information about you in response to a court or administrative order. Subject to all applicable legal requirements, we may also disclose health information about you in response to a subpoena.
- **Law Enforcement.** We may release health information if asked to do so by a law enforcement official in response to a court order, subpoena, warrant, summons or similar process, subject to all applicable legal requirements.
- **Coroners, Medical Examiners and Funeral Directors.** We may release health information to a coroner or medical examiner. This may be necessary, for example, to identify a deceased person or determine the cause of death.
- **Information Not Personally Identifiable.** We may use or disclose health information about you in a way that does not personally identify you or reveal who you are.
- **Family and Friends.** We may disclose health information about you to your family members or friends if we obtain your verbal agree-

ment to do so or if we give you an opportunity to object to such a disclosure and you do not raise an objection. We may also disclose health information to your family or friends if we can infer from the circumstances, based on our professional judgment that you would not object. For example, we may assume you agree to our disclosure of your personal health information to your spouse when you bring your spouse with you into an affiliated health care professional's exam room during treatment or while treatment is discussed.

In situations where you are not capable of giving consent (because you are not present or due to your incapacity or medical emergency), we or our affiliated health care professionals may, using professional judgment, determine that a disclosure to your family member or friend is in your best interest. In that situation, the only health information that will be disclosed will include information relevant to the person's involvement in your care. For example, we may inform the person who accompanied you to the emergency room that you suffered a heart attack and provide updates on your progress and prognosis. We may also use our professional judgment and experience to make reasonable inferences that it is in your best interest to allow another person to act on your behalf to pick up, for example, filled prescriptions, medical supplies, or X-rays.

- **Marketing and Sale.** We are prohibited from using your health information for marketing purposes without your specific written authorization. We also are prohibited from accepting payment for disclosing your health information with limited exceptions. Exceptions could include required sharing with public health agencies, making a copy of your record for you and research.
- **Fund Raising.** We may use your name and demographic information to conduct fund raising activities. We are required to offer you the opportunity to opt out of any these activities and honor your opt out decision.
- **Breach of Your Health Information.** If we or any of our agents inappropriately disclose your health information that is not protected, we have a responsibility to notify you of any breach. We will provide notice as soon as feasible but no later than 60 days from the date the breach was discovered.

OTHER USES AND DISCLOSURES OF HEALTH INFORMATION

We will not use or disclose your health information for any purpose other than those identified in the previous sections without your specific, written Authorization. If you give us Authorization to use or disclose health information about you, you may revoke that Authorization, **in writing**, at any time. If you revoke your Authorization, we will no longer use or disclose information about you for the reasons covered by your written Authorization, but we cannot take back any uses or disclosures already made with your permission.

In some instances, we may need specific, written authorization from you in order to disclose certain types of specially-protected information such as HIV, substance abuse, mental health, and genetic testing information for purposes such as treatment, payment and healthcare operations.

YOUR RIGHTS REGARDING HEALTH INFORMATION ABOUT YOU

You have the following rights regarding health information we maintain about you:

1. **Right to Inspect and Copy.** You have the right to inspect and copy your health information, such as medical and billing records, that we keep and use to make decisions about your care or referral to affiliated health care professionals. You must submit a written request to Janet Hamilton in order to inspect and/or copy records of your health information. If you request a copy of the information, we may charge a fee for the costs of copying and mailing. If your health

information is stored electronically, you may request an electronic copy of any health information we and/or our affiliated health care professionals store about you. We may charge for the cost of labor to prepare the electronic copy.

We will notify you of the cost involved and you may choose to withdraw or modify your request at that time before any costs are incurred. A modified request may include requesting a summary of your medical record.

We may deny your request to inspect and/or copy your record or parts of your record in certain limited circumstances. If you are denied copies of or access to, health information that we keep about you, you may ask that our denial be reviewed. If the law gives you a right to have our denial reviewed, we will select a licensed health care professional to review your request and our denial. The person conducting the review will not be the person who denied your request, and we will comply with the outcome of the review.

2. Right to Amend. If you believe health information we have about you is incorrect or incomplete, you may ask us to amend the information. You have the right to request an amendment as long as the information is kept by this office.

To request an amendment, complete and submit a MEDICAL RECORD AMENDMENT/CORRECTION FORM to Project Access NOW, PO Box 10953, Portland, OR 97296 or fax to 503.345.6553.

We may deny your request for an amendment if your request is not **in writing** or does not include a reason to support the request. In addition, we may deny or partially deny your request if you ask us to amend information that:

- We did not create, unless the person or entity that created the information is no longer available to make the amendment
- Is not part of the health information that we keep
- You would not be permitted to inspect and copy
- Is accurate and complete

If we deny or partially deny your request for amendment, you have the right to submit a rebuttal and request the rebuttal be made a part of your medical record. Your rebuttal needs to be 2 pages in length or less and we have the right to file a rebuttal responding to yours in your medical record. You also have the right to request that all documents associated with the amendment request (including rebuttal) be transmitted to any other party any time that portion of the medical record is disclosed.

3. Right to an Accounting of Disclosures. You have the right to request an "accounting of disclosures." This is a list of the disclosures we made of medical information about you for purposes other than treatment, payment, health care operations, when you specifically authorize release and a limited number of special circumstances involving national security, correctional institutions and law enforcement. The list will also exclude any disclosures we have made based on your written authorization.

To obtain this list, you must submit your request **in writing** to Project Access NOW, PO Box 10953, Portland, OR 97296 or fax to 503.345.6553. It must state a time period, which may not be longer than six years. Your request should indicate in what form you want the list (for example, on paper, electronically). The first list you request within a 12-month period will be free. For additional lists, we may charge you for the costs of providing the list. We will notify you of the cost involved and you may choose to withdraw or modify your request at that time before any costs are incurred.

4. Right to Request Restrictions. You have the right to request a restriction or limitation on the health information we use or disclose about

you for treatment, payment or health care operations. You also have the right to request a limit on the health information we disclose about you to someone who is involved in your care or the payment for it, like a family member or friend. For example, you could ask that we not use or disclose information about a surgery you had.

We are generally not required to agree to your request. We are required to honor your request if you pay for health care services and supplies "out of pocket" and you request we not share your health information related to any services and supplies you pay for "out of pocket" to your health plan for payment and health care operations. If we do agree, we will comply with your request unless the information is needed to provide you emergency treatment or we are required by law to use or disclose the information.

To request restrictions, you may complete and submit the REQUEST FOR RESTRICTION ON USE/DISCLOSURE OF MEDICAL INFORMATION to Project Access NOW, PO Box 10953, Portland, OR 97296 or fax to 503.345.6553.

5. Right to Request Confidential Communications. You have the right to request that we communicate with you about medical matters in a certain way or at a certain location. For example, you can ask that we only contact you at work or by mail.

To request confidential communications, you may complete and submit the REQUEST FOR RESTRICTION ON USE/DISCLOSURE OF MEDICAL INFORMATION AND/OR CONFIDENTIAL COMMUNICATION to Project Access NOW, PO Box 10953, Portland, OR 97296 or fax to 503.345.6553. We will not ask you the reason for your request. We will accommodate all reasonable requests. Your request must specify how or where you wish to be contacted.

6. Right to a Paper Copy of This Notice. You have the right to a paper copy of this notice. You may ask us to give you a copy of this notice at any time. Even if you have agreed to receive it electronically, you are still entitled to a paper copy. [You may also find a copy of this Notice on our web site.]

To obtain such a copy, contact Project Access NOW at PO Box 10953, Portland, OR 97296 or call or fax 503.345.6553.

CHANGES TO THIS NOTICE

We reserve the right to change this notice, and to make the revised or changed notice effective for medical information we already have about you as well as any information we receive in the future. We will post the current notice [optional: or a summary of the current notice] in the office with its effective date in the top right hand corner. You are entitled to a copy of the notice currently in effect.

We will inform you of any significant changes to this Notice. This may be through our provider newsletter, a sign prominently posted in our office, a notice posted on our web site or other means of communication.

COMPLAINTS

You will not be penalized for filing a complaint. If you believe your privacy rights have been violated, you may file a complaint with Project Access NOW at PO Box 10953, Portland, OR 97296 or fax to 503.345.6553 or with the Secretary of the Department of Health and Human Services at:

Office for Civil Rights Region X
U.S. Department of Health & Human Services
2201 Sixth Avenue - Mail Stop RX-11
Seattle, WA 98121
206.615.2290 (voice)
206.615.2296 (TDD)
206.615.2297 (fax)