



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.

If you have any questions about this Notice, please contact our Privacy Officer at (804) 237-5438.

1. Purpose

We understand that medical information about you and your health is personal and we are committed to protecting that information. We create a record of the care and services you receive at *PartnerMD* in order to provide you with quality care and to comply with certain legal requirements.

This Notice of Privacy Practices describes how we may use and disclose medical information about you, including demographic information, that may identify you and your related health care services to carry out your treatment, obtain payment for our services, perform the daily health care operations of this practice and for other purposes that are permitted or required by law. This notice also describes your rights to access and control your medical information.

2. Changes to this Notice

We may change the terms of our Notice at any time. The new Notice will be effective for all medical information that we maintain at that time. Upon your request, we will provide you with any revised Notice of Privacy Practices. To request a revised copy, you may call our office and request that a copy be sent to you in the mail or you may ask for one at the time of your next appointment. We may also send a copy of the revised notice to you via email if you have agreed (in writing or via email) to receive a copy of the notice electronically.

3. How We May Use and Disclose Medical Information about You

The following categories describe the different ways in which PartnerMD may use and disclose your medical information, including examples of each situation. These examples are not meant to describe every circumstance, but to give you an idea of the types of uses and disclosures that may be made by our office.

- **For your treatment:** Your medical information may be used and disclosed by us for the purpose of providing medical treatment to you or for another health care provider issuing medical treatment to you. For example, a nurse obtains treatment information about you and documents it in your medical record and the physician has access to that information. If you require an x-ray to be taken, the technician also has access to your medical information. In addition, your medical information may be provided to a physician to whom you have been referred, or who you are otherwise seeing, to ensure that the physician has the necessary information to diagnose or treat you.
- **To obtain payment for our services:** Your medical information may be used and disclosed by us to obtain payment for your health care bills or to assist another health care provider in obtaining payment for their health care bills. For example, we may submit requests for payment to your health insurance company for the medical services rendered. We may also disclose your medical information as required by your health insurance plan before it approves or pays for the health care services we recommend for you.
- **For our health care operations:** Your medical information may be used and disclosed by us to support our daily operations. These health care operation activities include, but are not limited to, quality assessment activities, employee review activities, training of medical students, licensing, and conducting or arranging for other business activities. For example, we may use the medical information we have to determine where we can make improvements in the services and care we provide.
- **For the health care operations of other health care providers:** We may also use your medical information to assist another health care provider treating you with its quality improvement activities, evaluation of the health care professionals, or for fraud and abuse detection or compliance. For example, we may disclose your medical information to another physician to assist in its efforts to make sure it is complying with all rules related to operating a medical practice.
- **For appointment reminders:** We may use or disclose your medical information to contact you to remind you of your appointment, by mail or by telephone. Our message will include the name of our practice or the name of our physician as well as the date and time for your appointment or a reminder that an appointment needs to be scheduled.



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- **To provide you with treatment alternatives:** We may use or disclose your medical information to provide you with information about treatment alternatives or other health-related benefits and services that may be of interest to you. For example, we may contact several home health agencies or physical therapy providers to discuss the services they provide when we have a patient who needs these services.
- **To our business associates:** We will share your medical information with third party “business associates” that perform various activities (e.g. billing or transcription services) for the practice. Whenever an arrangement between our office and a business associate involves the use or disclosure of your medical information, we will have a written agreement that contains terms that will protect the privacy of your medical information. For example, the practice may hire a billing company to submit claims to your health care insurer. Your medical information will be disclosed to this billing company, but a written agreement between our office and the billing company will prohibit the billing company from using your medical information in any way other than what we allow.
- **For PartnerMD membership activities:** We may use or disclose your demographic information and the dates that you received treatment from us in order to contact you for PartnerMD membership activities supported by our office. If you do not want to receive these materials, please contact the Privacy Officer and request that these materials not be sent to you.
- **Others involved in your health care:** Unless you object, we may disclose to a member of your family, relative, close friend or any other person you identify, your medical information that directly relates to that person’s involvement in your health care. If you object to such a disclosure, we may disclose such information as necessary if we determine that it is in your best interest based on our professional judgment. We may use or disclose your medical information to notify a family member or any other person that is responsible for your care and general health condition. Finally, we may use or disclose your medical information to an authorized public or private entity to assist in (1) disaster relief efforts and (2) to coordinate uses and disclosures to family and other individuals involved in your health care.
- **As required by law:** We may use or disclose your medical information to the extent that the use or disclosure is required by law. The use or disclosure will be made in compliance with the law and will be limited to the relevant requirements of the law. You will be notified, as required by law, of any such uses or disclosures.
- **For public health activities:** We may disclose your medical information for public health activities and purposes to a public health authority that is permitted by law to collect or receive information. The disclosure will be made for the purpose of controlling disease, injury, or disability. We may also disclose your medical information to any other government agency that is collaborating with the public health authority.
- **As required by the Food and Drug Administration:** We may disclose your medical information to a person or company required by the FDA to report adverse events, product defects or problems, biologic product deviations, to track products, to enable product recalls, to make repairs or replacements, or to conduct post marketing surveillance, as required.
- **For communicable disease exposure:** We may disclose your medical information, if authorized by law, to a person who may have been exposed to a communicable disease or may otherwise be at risk of contracting or spreading the disease or condition.
- **To your employer:** We may disclose your medical information concerning a work-related injury or illness to your employer if you are covered under your employer’s policy in order to conduct an evaluation relating to medical surveillance of the work place or to evaluate whether you have a work-related injury, in accordance with the law.
- **For health oversight:** We may disclose your medical information to a health oversight agency for activities authorized by law. Oversight agencies seeking this information include government agencies that oversee the health care system, government benefit programs (such as Medicare or Medicaid) and other government regulatory programs and civil rights laws.
- **In legal proceedings:** We may disclose your medical information in the course of any judicial or administrative proceeding, in response to an order by a court or administrative tribunal (to the extent such disclosure is expressly authorized) and in certain conditions in response to a subpoena or other lawful request.
- **For law enforcement:** We may also disclose your medical information, so long as all legal requirements are met, for law enforcement purposes. Examples of these include (1) information requests for identification and location purposes, (2) pertaining to victims of a crime, (3) suspicion that death has occurred as a result of criminal conduct, (4) in the event that a crime occurs on the premises of the Practice, and (5) in a medical emergency where it is likely that a crime has occurred.



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- **To coroners, funeral directors, and for organ donation:** We may disclose your medical information to a coroner or medical examiner for identification purposes, determining cause of death, or for the coroner or medical examiner to perform other duties authorized by law. We may also disclose medical information to a funeral director in order to permit the funeral director to carry out duties. We may disclose such information in reasonable anticipation of your death. Your medical information may be used and disclosed for cadaveric organ, eye or tissue donation purposes.
- **For research:** We may disclose your medical information to researchers when their research has been established as required by federal or state law.
- **Due to criminal activity:** Consistent with applicable federal and state laws, we may disclose your medical information if we believe that the use of disclosure is necessary to prevent or lessen a serious and imminent threat to the health and safety of a person or the public in general. We may also disclose your medical information if it is necessary for law enforcement authorities to identify or apprehend an individual.
- **For military activity and national security:** When the appropriate conditions apply, we may use or disclose medical information of individuals who are Armed Forces personnel (1) for activities deemed necessary by appropriate military command authorities, (2) for the purpose of a determination by the Department of Veterans Affairs of your eligibility for benefits, or (3) to foreign military authority if you are a member of that foreign military service. We may also disclose your information to authorized federal officials for conducting national security and intelligence activities, including the provision of protective services to the President or others legally authorized.
- **For workers' compensation:** Your medical information may be disclosed by us as authorized to comply with workers' compensation laws and other similar legally established programs.

Uses and disclosures other than those described in this Notice will require your written authorization. Your written authorization is required for: most uses and disclosures of psychotherapy notes; uses and disclosures of medical information for marketing purposes; and disclosures that are a sale of medical information. You may revoke such an authorization at any time, in writing, but it will not apply to any actions we have already taken.

4. Your Rights

You have the right to inspect and copy your medical information. You may inspect and obtain a copy of your medical information that we maintain. If you request a copy of the information, we may charge a fee for the costs of copying, mailing or other supplies associated with your request. The information may contain medical and billing records and any other records that we use for making decisions about you. However, under federal law, you may not inspect or copy the following records: psychotherapy notes; information compiled related to a civil, criminal or administrative action; and medical information that is subject to law that prohibits access to your medical information. In some circumstances, you may have a right to have this decision reviewed. Please contact our Privacy Officer if you have questions about access to your medical record.

You have the right to request a restriction of your medical information. This means that you may ask us not to use or disclose any part of your medical information for the purposes of treatment, payment or health care operations. You may also request that any part of your medical information not be disclosed to family members or friends who may be involved in your care. Your request must state specific restriction requested and to whom you want that restriction to apply.

We are not required to agree to your request, with one exception: We are required to agree to a requested restriction of disclosure to a health plan, if the disclosure is for the purpose of carrying out payment or health care operations, is not otherwise required by law, and pertains only to a health care item or service for which PartnerMD has been paid in full by you or someone other than the health plan. If we agree to the requested restriction, we may not use or disclose your medical information in violation of that restriction unless it is needed to provide emergency treatment or unless we otherwise notify you that we can no longer honor your request. With this in mind, please discuss any restriction you wish to request with your physician. Please request all restrictions in writing to our Privacy Officer.

You have the right to request that we accommodate you in communicating confidential medical information. We will accommodate reasonable requests, but we may condition this accommodation by asking you for information as to how payment will be handled or other information necessary to honor your request. Please make this request in writing to our Privacy Officer.



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You have the right to ask us to amend your medical information. You may request an amendment of your medical information as long as we maintain this information. In certain cases, we may deny your request for an amendment. If we deny your request, you have the right to file a disagreement with us and we may respond in writing to you. Please contact our Privacy Officer if you have questions about amending your medical record.

You have the right to receive an accounting of certain disclosures we have made, if any, of your medical information. This right applies to disclosures for purposes other than treatment, payment or health care operations as described in this Notice of Privacy Practices. It excludes disclosures we may have made pursuant to your authorization (permission) and disclosures we have made directly to you or to family members or friends involved in your care (where disclosure is permitted without authorization). You have the right to receive specific information regarding these disclosures that occurred during the six-year period before the date of your request. You may request a shorter timeframe. The right to receive this information is subject to certain additional exceptions, restrictions, and limitations.

Your request should indicate in what form you want the list of disclosures (for example, paper or electronic). 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 there are any costs.

You have the right to obtain a paper copy of this notice from us, even if you have agreed to receive this notice electronically. If you would like a hard copy of this notice, please request one from our Privacy Officer or request one when you are in our offices.

You have the right to be notified following the discovery of any “breach” of your unsecured protected health information as defined in HIPAA. We are committed to protecting the privacy and security of your medical information, and we will notify you, as required by law, following the discovery of a breach.

5. Complaints

You may complain to us if you believe your privacy rights have been violated by us. To file a complaint, please contact our Privacy Officer who will be happy to assist you. If you do wish to file a complaint with us, you may also contact the Secretary of Health and Human Services by writing to the Secretary, Office for Civil Rights, U.S. Dept. of Health & Human Services, 200 Independence Ave, SW, Washington, D.C. 20201. We will not take any action against you if you file a complaint or contact the Secretary.

6. Privacy Contact

If you have any questions about this Notice or require additional information, please contact our Privacy Officer at (804) 237-5438 or at 7001 Forest Avenue, Suite 302, Richmond, VA 23230. Our Privacy Officer is available during normal business hours to discuss your privacy questions, concerns, or complaints.

7. Effective Date

This notice was published and becomes effective on September 18, 2013.