



NOTICE OF PRIVACY PRACTICES

THIS NOTICE DESCRIBES HOW HEALTH INFORMATION ABOUT YOU MAY BE USED AND DISCLOSED, AND HOW YOU CAN GET ACCESS TO THIS INFORMATION. PLEASE REVIEW IT CAREFULLY.

YOU WILL BE ASKED TO SIGN A STATEMENT ON YOUR FIRST VISIT ACKNOWLEDGING THAT YOU HAVE READ THIS NOTICE. YOU MAY REQUEST A COPY OF THIS NOTICE FROM A STAFF MEMBER OR THE COMPLIANCE OFFICER AT ANY TIME.

If you have any questions about this Notice please contact our Compliance Officer, Dr. Tim Guest, by telephone or email, whose contact information may be found at the end of this document.

This Notice of Privacy Practices describes how we 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. It also describes your rights to access and control your Protected Health Information. "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 or condition and related health care services.

We are required to abide by the terms of this Notice of Privacy Practices. We may change or revise the terms of our notice at any time. The new notice will be effective for all Protected Health Information that we maintain at that time. Upon your request, we will provide you with any revised Notice of Privacy Practices when you call the office and request that a revised copy be sent to you in the mail or ask for one at the time of your next appointment, or you may access our web site, <http://www.life.edu/health/care.html>

1. Uses and Disclosures of Protected Health Information Based upon Your Written Consent

You will be asked to sign a consent form. Once you have consented to use and disclosure of your Protected Health Information for treatment, payment and health care operations by signing the consent form, Life University will use or disclose your Protected Health Information as described in Section 1 of this document. Your Protected Health Information may be used and disclosed by our employees and others that are involved in your care and treatment for the purpose of providing health care services to you. Your Protected Health Information may also be used and disclosed to seek payment of your health care bills and to support the operation of Life University

Following are examples of the types of uses and disclosures of your protected health care information that Life University and its clinics are permitted to make once you have signed our consent form. These examples are not meant to be exhaustive, but to describe the types of uses and disclosures that may be made by Life University once you have provided consent.

Treatment: We will use and disclose your Protected Health Information to provide, coordinate, or manage your health care and any related services. This includes the coordination or management of your health care with a third party that has already obtained your permission to have access to your Protected Health Information. For example, we would disclose your Protected Health Information, as necessary, to a home health agency that provides care to you. We will also disclose Protected Health Information to other physicians who may be treating you when we have the necessary permission from you to disclose your Protected Health Information. For example, your Protected Health Information may be provided to a physician to whom you have been referred to ensure that the physician has the necessary information to diagnose or treat you. In addition, we may disclose your Protected Health Information from time-to-time to another physician or health care provider (for example a specialist or laboratory) who, becomes involved in your care by providing assistance with your health care, diagnosis or treatment.

Payment: Your Protected Health Information will be used, as needed, to obtain payment for your health care services. This may include certain activities that your health insurance plan may undertake before it approves or pays for the health care services we recommend for you, such as; making a determination of eligibility or coverage for insurance benefits, reviewing services provided to you for medical necessity, and undertaking utilization review activities.

Healthcare Operations: We may use or disclose, as-needed, your Protected Health Information in order to support the business activities of Life University and its clinics. These activities include, but are not limited to, quality assessment activities, employee

review activities, training of our students, licensing, marketing and fundraising activities, and conducting or arranging for other business activities.

We may share your Protected Health Information with third party "Business Associates" that perform various activities (e.g., billing, transcription services) for the University and its clinics. Whenever an arrangement between Life University and a Business Associate involves the use or disclosure of your Protected Health Information, we will have a written contract that contains terms that will protect the privacy of your Protected Health Information.

Marketing and Fundraising Communications.

If Life University chooses to engage in marketing or fundraising activities, you have the right to request to opt-out of such fundraising communications by contacting our Compliance Officer by phone, e-mail or in writing and that request will be complied with. You have the right to obtain a paper copy of this notice from us, upon request, even if you have agreed to accept this notice by reading it where it is posted or by receiving it electronically.

We may use or disclose your Protected Health Information, as necessary, to provide you with information about treatment alternatives or other health-related benefits and services that may be of interest to you. We may also use and disclose your Protected Health Information for other marketing activities. For example, your name and address may be used to send you a newsletter about our University and its clinics and the services we offer. We may also send you information about products or services that we believe may be beneficial to you. You may contact our Compliance Officer to request that these materials not be sent to you.

We may use or disclose your demographic information and the dates you received care, as necessary, in order to contact you for fundraising activities supported by Life University. If you do not want to receive these materials, please contact our Compliance Officer and request that these fundraising materials not be sent to you.

2. Uses and Disclosures of Protected Health Information Based upon Your Written Authorization

Other uses and disclosures of your Protected Health Information will be made only with your written authorization, unless otherwise permitted or required by law as described below. You may revoke this authorization at any time, in writing except to the extent that Life University or its clinics has taken an action in reliance on the use or disclosure indicated in the authorization.

Prior written Authorization is required and will be obtained for *most* uses and disclosures of PHI: (1) that are psychotherapy notes; (2) for marketing purposes; (3) where Life University receives remuneration in exchange for disclosing such PHI; and (4) any other uses and disclosures of PHI not described in this Notice of Privacy Practices.

Other Permitted and Required Uses and Disclosures That May Be Made With Your Consent, Authorization or Opportunity to Object

We may use and disclose your Protected Health Information in the following instances. You have the opportunity to agree or object to the use or disclosure of all or part of your Protected Health Information. If you are not present or able to agree or object to the use or disclosure of the Protected Health Information, then Life University's Compliance Officer may, using professional judgment, determine whether the disclosure is in your best interest. In this case, only the Protected Health Information that is relevant to your health care will be disclosed.

Others Involved in Your Healthcare: Unless you object, we may disclose to a member of your family, a relative, a close friend or any other person you identify, your Protected Health Information that directly relates to that person's involvement in your health care. If you are unable to agree or 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 Protected Health Information to notify or assist in notifying a family member, personal representative or any other person that is responsible for your care of your location, general condition or death. Finally, we may use or disclose your Protected Health Information to an authorized public or private entity to assist in disaster relief efforts and to coordinate uses and disclosures to family or other individuals involved in your health care.

Emergencies: We may use or disclose your Protected Health Information in an emergency treatment situation. If this happens, the Compliance Officer shall try to obtain your consent as soon as reasonably practicable after the delivery of treatment. If we have attempted to obtain your consent but are unable to obtain your consent, we may still use or disclose your Protected Health Information to treat you.

Communication Barriers: We may use and disclose your Protected Health Information if we attempt to obtain consent from you but are unable to do so due to substantial communication barriers and the Faculty Doctor determines, using professional judgment, that you intend to consent to use or disclose under the circumstances.

3. Permitted and Required Uses and Disclosures That May Be Made Without Your Consent, Authorization or Opportunity to Object

We may use or disclose your Protected Health Information in the following situations without your consent or authorization. These situations include:

Required By Law: We may use or disclose your Protected Health 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.

Public Health Risks: We may disclose your Protected Health Information for public health activities and purposes to a public health authority that is permitted by law to collect or receive the information. The disclosure will be made for the purpose of controlling disease, injury or disability. We may also disclose your Protected Health Information, if directed by the public health authority, to a foreign government agency that is collaborating with the public health authority.

Communicable Diseases: We may disclose your Protected Health 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.

Serious Threat to Health or Safety: We may disclose your Protected Health Information if you are in such mental or emotional condition as to be dangerous to yourself, the person or property of others and if the appropriate personnel of Life University determines in good faith that disclosure is necessary to prevent the threatened danger. Under these circumstances your Personal Health Information may be provided to law enforcement personnel or others who have the official capacity to prevent or mitigate the threat to yourself or the public.

Health Oversight: We may disclose Protected Health Information to a health oversight agency for activities authorized by law, such as audits, investigations, and inspections, Oversight agencies seeking this information include government agencies that oversee the health care system, government benefit programs, other government regulatory programs and civil rights laws.

Abuse or Neglect: We may disclose your Protected Health Information to a public health authority that is authorized by law to receive reports of child abuse or neglect. In addition, we may disclose your Protected Health Information if we believe that you have been a victim of abuse, neglect or domestic violence to the governmental entity or agency authorized to receive such information. In this case, the disclosure will be made consistent with the requirements of applicable federal and state laws.

Food and Drug Administration: We may disclose your Protected Health Information to a person or company required by the Food and Drug Administration to report adverse events, product defects or problems, biologic product deviations, track products; to enable product recalls; to make repairs or replacements, or to conduct post marketing surveillance, as required.

Legal Proceedings: We may disclose Protected Health Information in the course of any judicial or administrative proceeding in response to an order of a court or administrative tribunal (to the extent such disclosure is expressly authorized), in certain conditions in response to a subpoena, discovery request or other lawful process.

Law Enforcement: We may also disclose Protected Health Information, so long as applicable legal requirements are met, for law enforcement purposes.

Coroners, Funeral Directors, and Organ Donation: We may disclose Protected Health 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.

Research: We may disclose your Protected Health Information to researchers when an institutional review board that has reviewed the research proposal and established protocols to ensure the privacy of your Protected Health Information has approved their research.

Criminal Activity: Consistent with applicable federal and state laws, we may disclose your Protected Health Information, if we believe that the use or disclosure is necessary to prevent or lessen a serious and imminent threat to the health or safety of a person or the public due to criminal activity.

Military Activity and National Security: When the appropriate conditions apply, we may use or disclose Protected Health 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 a foreign military authority if you are a member of a foreign military service, or (4) for conducting national security and intelligence activities, including for the provision of protective services to the President or others legally authorized.

Workers' Compensation: Your Protected Health Information may be disclosed by us as authorized to comply with workers' compensation laws and other similar legally established programs.

Inmates: We may use or disclose your Protected Health Information if you are an inmate of a correctional facility and Life University created or received your Protected Health Information in the course of providing care to you.

Required Uses and Disclosures: Under the law, we must make disclosures to you and when required by the Secretary of the Department of Health and Human Services to investigate or determine our compliance with the requirements of section 164.500 et. Seg.

4. Your Rights

The following is a statement of your rights with respect to your Protected Health Information and a brief description of how you may exercise these rights. You have the right to inspect and copy your Protected Health Information. This means you may inspect and obtain a copy of Protected Health Information about you that is contained in a designated record set for as long as we maintain the Protected Health Information. A "designated record set" contains health and billing records and any other records that Life University and its clinics use for making decisions about you.

Under federal law, however, you may not inspect or copy the following records; psychotherapy notes; information compiled in reasonable anticipation of, or use in, a civil, criminal, or administrative action or proceeding, and Protected Health Information that is subject to law that prohibits access to Protected Health Information. Depending on the circumstances, a decision to deny access may be reviewable. In some circumstances, you may have a right to have this decision reviewed. Please contact our Compliance Officer if you have questions about access to your health record

You have the right to request a restriction of your Protected Health Information. This means you may ask us not to use or disclose any part of your Protected Health Information for the purposes of treatment, payment or healthcare operations. You may also request that any part of your Protected Health Information not be disclosed to family members or friends who may be involved in your care or for notification purposes as described in this Notice of Privacy Practices. Your request must state the specific restriction requested and to whom you want the restriction to apply.

Life University and its clinics are not required to agree to a restriction that you may request. If our Compliance Officer believes it is in your best interest to permit use and disclosure of your Protected Health Information, your Protected Health Information will not be restricted. If our Compliance Officer agrees to the requested restriction, we may not use or disclose your Protected Health Information in violation of that restriction unless it is needed to provide emergency treatment. With this in mind please discuss any restriction you wish to request with the Compliance Officer, whose contact information can be found at the end of this document.

Requests for Restrictions will be honored for PHI relating to Treatment Paid for Out of Pocket in Full.

Life University will honor a request for restriction of Protected Health Information with regard to treatment that is paid for out-of-pocket in full and the disclosure would be solely for payment or health care operations purposes to a health care plan.

You have the right to request to receive confidential communications from us by alternative means or at an alternative location. We will accommodate reasonable requests. We may also condition this accommodation by asking you for information as to how payment will be handled or specification of an alternative address or other method of contact. We will not request an explanation from you as to the basis for the request. Please make this request in writing to our Compliance Officer.

You may have the right to have the Compliance Officer amend your Protected Health Information. This means you may request an amendment of Protected Health Information about you in a designated record set for as long as we maintain this information. In certain cases, we may deny your request for an amendment. If we deny your request for amendment, you have the right to file a statement of disagreement with us and we may prepare a rebuttal to your statement and will provide you with a copy of any such rebuttal. Please contact our Compliance Officer to determine if you have questions about amending your health record.

You have the right to receive an accounting of certain disclosures we have made, if any, of your Protected Health Information.

This right applies to disclosures for purposes other than treatment, payment or healthcare operations as described in this Notice of Privacy Practices. It excludes disclosures we may have made to you, for a facility directory, to family members or friends involved in your care, or for notification purposes. You have the right to receive specific information regarding these disclosures that occurred after April 14, 2003. You may request a shorter time frame. The right to receive this information is subject to certain exceptions, restrictions and limitations.

You have the right to request copies of your Protected Health Information.

This right applies to requests by you or your authorized representative. You may request copies of your Protected Health Information in written or electronic format. If you request electronic records Life University will determine the most appropriate electronic format in which to provide the requested Protected Health Information.

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Notification in the Event of a Security Breach

In the event that your Protected Health Information becomes compromised due to a security breach, you will be notified in accordance with the current Health and Human Services guidelines for breach notification and mitigation.

3. Complaints

You may complain to us or to the Secretary of Health and Human Services if you believe we have violated your privacy rights by us. You may file a complaint with us by notifying our Compliance Officer and complete a complaint and resolution form. We will not retaliate against you for filing a complaint.

You may contact our Compliance Officer, Dr. Tim Guest tguest@life.edu (770) 426-2935 for further information about the complaint process.

This notice was published and became effective on April 2003.

Most recent updated May 30, 2013