

## **Notice of Health Information Privacy Practices**

### **Diagnostic Radiology Associates, Imaging Partners, and Valley Imaging Partners**

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

The Health Insurance Portability and Accountability Act of 1996 ("HIPAA") grants you certain privacy rights regarding your health information maintained by **Diagnostic Radiology Associates (DRA), Imaging Partners (IP), and/or Valley Imaging Partners (VIP)**. HIPAA requires that DRA, IP, and VIP follow certain rules regarding the disclosure of this information to others. The purpose of this Notice is to explain how and when health information is disclosed and your rights regarding your health information. DRA, IP, and VIP will not use or disclose health information except as described in this Notice as currently in effect. This Notice applies to all of the medical records generated by DRA, IP, and VIP.

#### **EXAMPLES OF DISCLOSURES FOR TREATMENT, PAYMENT, AND HEALTHCARE**

**OPERATIONS:** The following categories describe the ways that DRA, IP, and VIP may use and disclose health information.

**Treatment:** DRA, IP, and VIP will use a patient's health information in providing and coordinating his/her healthcare. We may disclose all or any portion of the medical record information to the referring physician, consulting physician(s), nurses, and other healthcare providers who have a legitimate need for such information in the care and continued treatment of the patient.

**Payment:** DRA, IP, and VIP may release medical information for the purposes of determining coverage, billing, claims management, medical data processing, and reimbursement. The information may be released to an insurance company, third party payer or other entity (or their authorized representatives) involved in the payment of medical bills and may include copies or excerpts of medical records, which are necessary for payment of a patient's account. For example, a bill sent to a third party payer may include information that identifies the patient, his/her diagnosis, and the imaging procedures that were performed.

**Routine Healthcare Operations:** DRA, IP, and VIP may use and disclose medical information during routine healthcare operations, including those for quality assurance, compliance programs, utilization review, medical review, internal auditing, accreditation, certification, licensing, credentialing, training, peer review, case management activities, coordination of care, referrals to other providers, legal services, business planning, and sale of the medical practice to another healthcare provider.

**Family/Friends:** Medical information may also be disclosed to other people involved in a patient's medical care, such as family members, friends, clergy, and others who provide services that are part of the patient's care. We may also give information to someone who helps pay for the patient's care.

**Communications:** DRA, IP, and VIP may use and disclose medical information to contact a patient by telephone or mail and remind him/her of an appointment for an examination or care, to ask for information necessary to appropriately schedule and perform an examination, to give information or instructions about an

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examination, or to give the results of an examination. IP and VIP patients may receive fundraising solicitations, but will have the opportunity to opt out of fundraising communications at the time of the solicitation.

**Business Associates:** DRA, IP, and VIP may disclose certain medical information to Business Associates. A Business Associate is an individual or entity under contract with DRA, IP, or VIP to perform or assist DRA, IP, or VIP in the performance of functions or activities which necessitate the use and disclosure of medical information. Examples of Business Associates include, but are not limited to, third-party billing companies, medical transcriptionists, imaging archival companies, medical record copying services, medical equipment service personnel, companies hired to destroy or dispose of out-dated medical records and imaging studies, lawyers, accountants, and consultants. DRA, IP, and VIP require the Business Associate to protect the confidentiality of medical information.

**Other Personnel in DRA/IP/VIP Offices:** On occasion, working or observing personnel who are not DRA/IP/VIP employees or physicians and who are not DRA Business Associates (patient information is not intentionally disclosed to them to perform a function or activity) will be present in the DRA/IP/VIP offices. These personnel may inadvertently see or hear patients' private health information while performing their duties in the DRA/IP/VIP offices. Such individuals include, but are not limited to, personnel from other medical offices, sales people, construction workers, students, new equipment training representatives, and cleaning people. Such personnel are asked to sign a Confidentiality Agreement before working or observing in the DRA/IP/VIP offices.

**Regulatory Agencies:** DRA, IP, and VIP may disclose medical information to a health oversight agency for activities authorized by law, including, but not limited to, licensure, certification, audits, investigations, and inspections. These activities are necessary for the government and certain private health oversight agencies to monitor the healthcare system, government programs, and compliance with civil rights. For example, by law, mammography services must be monitored and accredited.

**Law Enforcement:** DRA, IP, and VIP may disclose medical information for law enforcement purposes as required by law or in response to a valid subpoena or court order.

**Public Health:** As required by law, DRA, IP, or VIP may disclose medical information to public health or legal authorities charged with preventing or controlling disease, injury, or disability. For example, the law requires reporting cases of tuberculosis and cases of suspected child abuse.

**Workers Compensation:** DRA, IP, and VIP may release medical information for workers' compensation or similar programs. These programs provide benefits for work-related injuries or illnesses.

**Military/Veterans:** DRA, IP, and VIP may disclose medical information as required by military command authorities, if a patient is a member of the armed forces.

**Inmates:** If a patient is an inmate of a correctional institute or under the custody of a law enforcement officer, DRA, IP, and VIP may release medical record information to the correctional institute or law enforcement official.

**Required by Law:** DRA, IP, and VIP will disclose medical information when required to do so by law.

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**Coroners, Medical Examiners, Funeral Directors:** DRA, IP, and VIP may release medical information to a coroner or medical examiner. This may be necessary, for example, to identify a deceased person or to determine a cause of death. DRA, IP, and VIP may also release medical information to funeral directors as necessary to carry out their duties.

**Other Uses:** Any other uses and disclosures will be made only with written authorization. For example, authorization would be required for uses and disclosures for marketing purposes or for disclosures that constitute a sale of protected health information.

**SPECIAL RULES REGARDING DISCLOSURE OF PSYCHIATRIC, SUBSTANCE ABUSE, AND HIV-RELATED INFORMATION:** For disclosures concerning health information relating to care for psychiatric conditions, substance abuse, or HIV-related testing and treatment, special restrictions may apply. For example, DRA, IP, and VIP generally may not disclose this specially protected information in response to a subpoena, warrant, or other legal process unless the patient signs a special authorization or a court orders the disclosure.

**Psychiatric Information:** If needed for a patient's diagnosis or treatment in a mental health program, psychiatric information may be disclosed based on a patient's general authorization and limited information may be disclosed for payment purposes. Otherwise, DRA, IP, and VIP will not disclose records which relate to a diagnosis or treatment of a mental condition by a psychiatrist or which are prepared at a mental health facility without specific written authorization or as required or permitted by law.

**HIV-Related Information:** HIV-related information will not be disclosed, except under limited circumstances set forth under state or federal law, without the patient's specific written authorization. A general authorization for release of medical or other information will not be sufficient for purposes of releasing HIV-related information. As required by Connecticut law, if DRA, IP, or VIP make a lawful disclosure of HIV-related information, DRA, IP, or VIP will enclose a statement that notifies the recipient of the information that they are prohibited from further disclosing the information.

**Substance Abuse Treatment:** If a patient is treated in a specialized substance abuse program, information which could identify such patient as an alcohol or drug-dependent patient will not be disclosed without the patient's specific authorization except for purposes of treatment, or where specifically required or allowed under state or federal law.

**PATIENT HEALTH INFORMATION RIGHTS:** Although all records and imaging data at DRA, IP, and VIP are the property of DRA, IP, and VIP, patients have the following rights concerning their medical information.

**Right to Confidential Communications:** Patients have the right to receive confidential communications of their medical information by alternative means or at alternative locations. For example, they may request in writing that DRA, IP, and VIP only contact them at work or by mail.

**Right to Inspect and Copy:** Patients have the right to inspect and copy their medical information. For information stored in electronic form, patients may receive an electronic copy or may direct that an electronic copy be sent directly to a designated entity or individual. Copying fees will be charged.

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**Right to Amend:** Patients have the right to request amendment of their medical information. DRA, IP, and VIP require completion of a written amendment request, including the reason for the requested amendment.

**Right to an Accounting:** Patients have the right to obtain a statement of the disclosures of their medical information. The request must be in writing.

**Right to Request Restrictions:** Patients have the right to request restrictions on certain uses and disclosures of their medical information. For some uses and disclosures, DRA, IP, and VIP are not required to agree to honor this request. DRA, IP, and VIP must restrict disclosure to a patient's health insurance company if so requested by a self-pay patient or by a patient on whose behalf payment has been made by another person.

**Right to Receive Copy of this Notice:** Patients have the right to receive a paper copy of this Notice, upon request.

**Right to Revoke Authorization:** Patients have the right to revoke their authorization to use or disclose their medical information except to the extent that action has already been taken in reliance on their authorization.

**Right to Breach Notification:** Patients have the right to be notified if there has been a breach in the security protecting their medical information, unless there is a low probability that the information has been compromised.

**FOR MORE INFORMATION OR TO REPORT A PROBLEM:** For questions and additional information, please ask one of our DRA/IP/VIP employees or physicians. If they cannot provide the information, please ask for our Privacy Officer or, if not available, our Compliance Officer or other Compliance Committee member. Patients who believe their privacy rights have been violated, may file a complaint with DRA, IP, or VIP or with the United States Department of Health and Human Services. To file a complaint with DRA, IP, or VIP, please call 203-756-8911 and ask for the Privacy Officer or write to: Privacy Officer, Diagnostic Radiology Associates (Imaging Partners/Valley Imaging Partners), 134 Grandview Avenue, Waterbury, CT 06708. All formal complaints must be submitted in writing. A complaint may also be submitted to: Office for Civil Rights, U.S. Department of Health and Human Services, JFK Federal Building - Room 1875, Boston, MA 02203 (voice phone: 617-565-1340, TDD: 617-565-1343, fax: 617-565-3809). There will be no retaliation for filing a complaint.

**CHANGES TO THIS NOTICE:** DRA, IP, and VIP will abide by the terms of the Notice currently in effect. DRA, IP, and VIP reserve the right to change their privacy practices and the terms of this Notice at any time and to make the new practices and Notice provisions effective for all protected health information that they maintain. The new Notice will be posted at DRA/IP/VIP offices and on the DRA website.

**NOTICE EFFECTIVE DATE:** The effective date of this Notice is March 1, 2014.