

**ADVENTIST MIDWEST HEALTH
NOTICE OF PATIENT PRIVACY PRACTICES**

Effective Date: October 30, 2007

**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 the Compliance and Privacy Officer for Adventist Midwest Health (630) 856-4572.

Section A: Who Will Follow This Notice?

This Notice describes the practices of the Adventist Midwest Health entities listed below and that of:

- Any health care professional authorized to enter information into your medical chart.
- All organizations and departments of Adventist Midwest Health.
- Any member of a volunteer group we allow to help you while at Adventist Midwest Health.
- All employees, staff and other personnel of Adventist Midwest Health.

Adventist Midwest Health entities, includes but are not limited to: Adventist Hinsdale Hospital, Adventist La Grange Memorial Hospital, Adventist GlenOaks Hospital, Adventist Bolingbrook Hospital, Adventist Health Care at Home, Adventist Health Network, Adventist Health Partners, Adventist Lab Partners, Adventist Imaging Center, Adventist Midwest Management Services, Adventist Paulson Rehab Network, and Adventist St. Thomas Hospice, (referred to in this notice as "Adventist Midwest Health").

Adventist Midwest Health entities may share medical information with each other for treatment, payment or health care operations purposes described in this Notice. This list of Adventist Midwest Health facilities, programs, sites and locations is not exhaustive and may not reflect recent acquisitions or sales of entities, sites, or locations.

Section B: Our Pledge Regarding Medical Information.

We understand that medical information about you and your health is personal. We are committed to protecting medical information about you. We create a record of the care and services you receive at Adventist Midwest Health. We need this record to provide you with quality care and to comply with certain legal requirements. This Notice applies to all of the records of your care generated or maintained by Adventist Midwest Health, whether made by Adventist Midwest Health personnel or your personal doctor. Your personal doctor may have different policies or notices regarding the doctor's use and disclosure of your medical information created in the doctor's office or clinic.

This Notice will tell you about the ways in which we may use and disclose medical information about you. It also describes your rights and certain obligations we have regarding the use and disclosure of medical information.

We are required by law to:

- ♦ Use our best efforts to keep private any medical information that identifies you;
- ♦ Offer this Notice of our legal duties and privacy practices with respect to medical information about you; and
- ♦ Follow the terms of the Notice that is currently in effect.

Section C: How We May Use and Disclose Medical Information About You.

The following categories describe different ways that we use and disclose medical information. For each category of uses or disclosures we will explain what we mean and try to give some examples. Not every use or disclosure in a category will be listed. However, all of the ways we are permitted to use and disclose information will fall within one of the categories.

- **Treatment.** We may use medical information to provide you with medical treatment or services. We may disclose medical information to doctors, nurses, technicians, students, or Adventist Midwest Health personnel who are involved in taking care of you. For example, a doctor treating you for a broken leg may need to know if you have diabetes because diabetes may slow the healing process. In addition, the doctor may need to tell the dietitian if you have diabetes so that we can arrange for appropriate meals. Different departments of Adventist Midwest Health also may share medical information in order to coordinate the different things you need, such as prescriptions, lab work and x-rays. We also may disclose medical information to people outside Adventist Midwest Health who may be involved in your medical care after you leave, such as family members, clergy or others we use to provide services that are part of your care.
- **Payment.** We may use and disclose medical information so that the treatment and services you receive at Adventist Midwest Health 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 surgery you received at Adventist

Midwest Health so your health plan will pay us or reimburse you for the surgery. 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 cover the treatment.

- **Health Care Operations.** We may use and disclose medical information for Adventist Midwest Health's operations. These uses and disclosures are necessary to run Adventist Midwest Health and make sure that all of our patients receive quality care. For example, we may use medical information to review our treatment and services and to evaluate the performance of our staff in caring for you. We may also combine medical information about many patients to decide what additional services Adventist Midwest Health should offer, what services are not needed, and whether certain new treatments are effective. We may also disclose information to doctors, nurses, technicians, students, and Adventist Midwest Health personnel for review and learning purposes. We may also combine the medical information we have with medical information from other entities to compare how we are doing and see where we can make improvements in the care and services we offer. We may remove information that identifies you from this set of medical information so others may use it to study health care and health care delivery without learning who the specific patients are.
- **Appointment Reminders.** We may use and disclose medical information to contact you as a reminder that you have an appointment for treatment or medical care at Adventist Midwest Health.
- **Treatment Alternatives.** We may use and disclose medical information to tell you about or recommend possible treatment options or alternatives that may be of interest to you.
- **Health-Related Benefits and Services.** We may use and disclose medical information to tell you about health-related benefits or services that may be of interest to you.
- **Fundraising Activities.** We may use information to contact you in an effort to raise money for Adventist Midwest Health. We may disclose information to a foundation related to Adventist Midwest Health so that the foundation may contact you to raise money. We would release only contact information, such as your name, address and phone number and the dates you received treatment or services at Adventist Midwest Health. If you do not want Adventist Midwest Health to contact you for fundraising efforts, you must notify us in writing. (See contact information under section H).
- **Patient Directory.** We may include certain limited information in an Adventist Midwest Health patient directory while you are a patient at Adventist Midwest Health. This information may include your name, location in Adventist Midwest Health, your general condition (e.g., fair, stable, etc.) and your religious affiliation. The directory information, except for your religious affiliation, may also be released to people who ask for you by name. Your religious affiliation may be given to a member of the clergy, even if they don't ask for you by name. This is so your family, friends and clergy can visit you at Adventist Midwest Health and generally know how you are doing. Directory information will not be released if identifying the unit you are in would reveal that you are receiving treatment for a mental illness, developmental disability, HIV/AIDS or substance abuse.

- **Individuals Involved in Your Care or Payment for Your Care.** We may release medical information to a friend or family member who is involved in your medical care. We may also give information to someone who helps pay for your care. We may also tell your family or friends your condition and that you are at Adventist Midwest Health. In addition, we may disclose medical information to an entity assisting in a disaster relief effort so that your family can be notified about your condition, status and location.
- **Research.** Under certain circumstances, we may use and disclose medical information for research purposes. For example, a research project may involve comparing the health and recovery of all patients who received one medication to those who received another, for the same condition. All research projects, however are subject to a special approval process. This process evaluates a proposed research project and its use of medical information, trying to balance the research needs with patients' need for privacy of their medical information. Before we use or disclose medical information for research, the project will have been approved through this research approval process, but we may, however, disclose medical information to people preparing to conduct a research project, for example, to help them look for patients with specific medical needs, so long as the medical information they review does not leave Adventist Midwest Health. We will generally ask for your specific 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 Adventist Midwest Health.
- **As Required By Law.** We will disclose medical information when required to do so by federal, state or local law.
- **To Avert a Serious Threat to Health or Safety.** We may use and disclose medical information when necessary to prevent a serious threat to your health and safety or the health and safety of the public or another person. Any disclosure, however, would only be to someone able to help prevent the threat.

Section D: Special Situations

- **Organ and Tissue Donation.** If you are an organ donor, we may release medical information to organizations that handle organ procurement or organ, eye or tissue transplantation or to an organ donation bank, as necessary to facilitate organ or tissue donation and transplantation.
- **Military and Veterans.** If you are a member of the armed forces, we may release medical information as required by military command authorities. We may also release medical information about foreign military personnel to the appropriate foreign military authority.
- **Workers' Compensation.** We may release medical information for workers' compensation or similar programs. These programs provide benefits for work-related injuries or illness.

- **Public Health Risks.** We may disclose medical information for public health activities. These activities generally include the following:
 - ◆ to prevent or control disease, injury or disability;
 - ◆ to report births and deaths;
 - ◆ to report child abuse or neglect to the Illinois Department of Children and Family Services or other government authorities authorized by law to receive such reports;
 - ◆ to report reactions to medications or problems with products;
 - ◆ to notify people of recalls of products they may be using;
 - ◆ to notify a person who may have been exposed to a disease or may be at risk for contracting or spreading a disease or condition;
 - ◆ to notify the Illinois Department of Children and Family Services, the Illinois Department of Human Services, or other government authority authorized by law to receive such information if we believe a patient has been the victim of abuse, neglect or domestic violence. We will only make this disclosure if you agree or when required or authorized by law.

- **Health Oversight Activities.** We may disclose medical information to a health oversight agency for activities authorized by law. These oversight activities include, for example, audits, investigations, inspections, and licensure. These activities are necessary for the government to monitor the health care system, government health programs such as Medicare and Medicaid, and compliance with civil rights laws.

- **Lawsuits and Disputes.** If you are involved in a lawsuit or a dispute, we may disclose medical information in response to a court or administrative order. We may also disclose medical information in response to a subpoena, discovery request, or other lawful process by someone else involved in the dispute, but only if efforts have been made to tell you about the request or to obtain an order protecting the information requested.

- **Law Enforcement.** We may release medical information if asked to do so by a law enforcement official:
 - ◆ In response to a court order, subpoena, warrant, summons or similar process;
 - ◆ To identify or locate a suspect, fugitive, material witness, or missing person;
 - ◆ About the victim of a crime if, under certain limited circumstances, we are unable to obtain the person's agreement;
 - ◆ About a death we believe may be the result of criminal conduct;
 - ◆ About criminal conduct at Adventist Midwest Health; and
 - ◆ In emergency circumstances to report a crime; the location of the crime or victims; or the identity, description or location of the person who committed the crime.

- **Coroners, Medical Examiners and Funeral Directors.** We may release medical information to a coroner or medical examiner. This may be necessary, for example, to identify a deceased person or determine the cause of death. We may also release medical information about patients of Adventist Midwest Health to funeral directors as necessary to carry out their duties.

- **National Security and Intelligence Activities.** We may release medical information to authorized federal officials for intelligence, counterintelligence, and other national security activities authorized by law.
- **Protective Services for the President and Others.** We may disclose medical information to authorized federal officials so they may provide protection to the President, other authorized persons or foreign heads of state or conduct special investigations.
- **Inmates.** If you are an inmate of a correctional institution or under the custody of a law enforcement official, we may release medical information to the correctional institution or law enforcement official. This release would be necessary (1) for the institution to provide you with health care; (2) to protect your health and safety or the health and safety of others; or (3) for the safety and security of the correctional institution.

Section E: Uses and Disclosures of Your Highly Confidential Information

Federal and Illinois law requires special privacy protections for certain highly confidential information about you, including information that: (1) is maintained in psychotherapy notes; (2) is about mental health and developmental disabilities services; (3) is about alcohol and drug abuse prevention, treatment and referral; (4) is about HIV/AIDS testing, diagnosis or treatment; (5) is about venereal disease(s); (6) is about genetic testing; (7) is about child abuse and neglect; (8) is about domestic abuse of an adult with a disability; or (9) is about sexual assault. In order for us to disclose this highly confidential information for a purpose other than those permitted by law, we must obtain your written authorization and comply with requirements of these privacy laws.

Section F: Your Rights Regarding Medical Information About You

You have the following rights regarding medical information we maintain about you: If you have any questions about your rights or to exercise these rights and obtain the relevant form, you may contact the Compliance and Privacy Officer for Adventist Midwest Health (see contact information under section H).

- **Right to Inspect and Copy.** You have the right to inspect and copy some of the medical information that may be used to make decisions about your care. Usually, this includes medical and billing records, but does not include psychotherapy notes. 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.

We may deny your request to inspect and copy medical information in certain circumstances. If you are denied access to medical information, in some cases, you may request that the denial be reviewed. Another licensed health care professional chosen by Adventist Midwest Health will review your request and the denial. The person conducting the review will not be the person who denied your request. We will comply with the outcome of the review.

- **Right to Amend.** If you feel that medical 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 for as long as the information is kept by or for Adventist Midwest Health.

In addition, you must provide a reason that supports your request.

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

- ♦ Was not created by us, unless the person or entity that created the information is no longer available to make the amendment;
- ♦ Is not part of the medical information kept by or for Adventist Midwest Health;
- ♦ Is not part of the information which you would be permitted to inspect and copy; or
- ♦ Is accurate and complete.

If we deny your request for an amendment concerning information about the treatment of a mental illness or developmental disability, you have the right to appeal our decision to an Illinois court.

- **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. Your request must state a time period which may not be longer than six years and may not include dates before April 14, 2003. 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.
- **Right to Request Restrictions.** You have the right to request a restriction or limitation on the medical information we use or disclose for treatment, payment or health care operations. You also have the right to request a limit on the medical information we disclose to someone who is involved in your care or the payment for your care, like a family member or friend. For example, you could ask that we not use or disclose information about a surgery you had.

In your request, you must tell us (1) what information you want to limit; (2) whether you want to limit our use, disclosure or both; and (3) to whom you want the limits to apply, for example, disclosures to your spouse.

We are not required to agree to your request. If we do agree, we will comply with your request unless the information is needed to provide you emergency treatment.

- **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. 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.
- **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 this Notice electronically, you are still entitled to a paper copy of this Notice. You may obtain a copy of this Notice at our website, www.keepingyouwell.com.

Section G: Changes To This Notice.

We reserve the right to change this Notice. We reserve the right 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 a copy of the current Notice in each Adventist Midwest Health facility. The Notice will contain on the first page, in the top right-hand corner, the effective date. In addition, each time you register at or are admitted to Adventist Midwest Health for treatment or health care services as an inpatient or outpatient, we will offer you a copy of the current Notice in effect.

Section H: Complaints

If you believe your privacy rights have been violated, you may file a complaint with the Adventist Midwest Health Facility or with the Secretary of the Department of Health and Human Services. For complaints involving covered entities in Illinois and Wisconsin:

Region V, Office for Civil Rights
U.S. Department of Health and Human Services
233 N. Michigan Ave., Suite 240
Chicago, IL 60601
Phone (312) 886-2359
Fax (312) 886-1807
TDD (312) 353-5693

To file a complaint with an Adventist Midwest Health Facility, contact Adventist Midwest Health Compliance and Privacy Officer, 222 East Ogden Ave., Hinsdale, IL 60521, (630) 856-4572. All complaints must be submitted in writing.

You will not be penalized for filing a complaint.

Section I: Other Uses of Medical Information

Other uses and disclosures of medical information not covered by this notice or the laws that apply to us will be made only with your written permission. If you provide us permission to use or disclose medical information, you may revoke that permission, in writing, at any time. If you revoke your permission, we will no longer use or disclose medical information for the reasons covered by your written authorization. You understand that we are unable to take back any disclosures we have already made with your permission, and that we are required to retain our records of the care that we provided to you.

Section J: Organized Health Care Arrangement

Adventist Midwest Health, the independent contractor members of its Medical Staff, and other health care providers affiliated with Adventist Midwest Health have agreed, as permitted by law, to share your health information among themselves for purposes of your treatment, payment or health care operations. This enables us to better address your health care needs.