

Notice of Privacy Practices

St. Coletta of Wisconsin, Jefferson, WI 53549

Effective January 1, 2018 — Page 1 of 4

This notice explains how your personal medical information may be used and disclosed and how you can have access to this information. Please review it carefully.

This notice is to tell you how we may use and disclose protected health information. Protected Health Information includes any health information about you that identifies you or for which there is a reasonable basis to believe the information can be used to identify you. In the header above, that information is referred to as “medical information”. In this notice, we simply call all such Protected Health Information, “health information”.

This notice also tells you about your legal rights and our duties with respect to your health information. In addition, it tells you how to file a complaint if you believe your privacy rights have been violated.

How We May Use and Disclose Health Information About You

We may use and disclose your health information for a number of different purposes as described below:

For Treatment. We may use your health information to provide, coordinate, or manage the services, supports, and health care you receive from us and other providers. We may disclose your health information to doctors, nurses, Case Coordinators/Qualified Intellectual Disabilities Professionals (QIDPs), psychologists, social workers, direct support staff and other agency staff, volunteers, and other persons who are involved in supporting you or providing care. We may consult with other health care providers concerning you, and as part of the consultation, share your health information with them. For example, our employees may discuss your information to develop and carry out your Individual Service Plan. They may share information to coordinate needed services, such as medical tests, transportation to a doctor’s visit, physical therapy, etc. They may also need to disclose health information to entities outside of our organization (for example, another provider or a state/local agency) to obtain new services for you.

For Payment. We may use and disclose your health information so we can be paid for the services we provide to you. This may include billing a third party payer, such as Medicaid or other state agency (for example, the state’s Office of Intellectual Disabilities), or your insurance company. For example, we may need to provide Medicaid program information about the 18 services we provide to you to the state in order to be reimbursed for those services. We also may need to provide the state Medicaid office information to ensure you are eligible for the Medical Assistance program.

For Health Care Operations. We may use and disclose health information about you for our own operations. These are necessary for us to operate St. Coletta of Wisconsin and to maintain quality services for the people we serve. For example, we may use health information about you to review the services we provide and the performance of our employees supporting you. We may disclose health information about you to train our staff and volunteers. We also may use the information to study ways to more efficiently manage our organization, for accreditation or licensing activities, or for our compliance program.

How We Will Contact You. Unless you tell us otherwise in writing, we may contact you by telephone /cellphone or by mail or by email at either your home or your workplace. At either location, we may leave messages for you on an answering machine or voice mail. If you want to request that we communicate to you in a certain way or at a certain location, see “Right to Receive Confidential Communications” in this Notice.

Appointment Reminders. We may use and disclose your health information when we contact you to remind you of an appointment for treatment or services.

Treatment and Service Alternatives. We may use and disclose your health information when we contact you about treatment and service alternatives that may be of interest to you.

Health-Related Benefits and Services. We may use and disclose your health information when we contact you about health-related benefits and services that may be of interest to you.

Marketing Communications. We may use and disclose your health information when we communicate with you about a product or service to encourage you to purchase the product or service. This may be:

- ▶ To describe a health-related product or service that is provided by us
- ▶ For your treatment
- ▶ For case management or care coordination for you
- ▶ To direct or recommend alternative treatments, therapies, health care providers, or settings of care

Fund Raising. St. Coletta will only release general group demographic information that cannot be individually identified when fund raising.

St. Coletta of Wisconsin Directory. We may include your name, your location in our facility, your condition described in general terms, and your religious affiliation in our directory while you receive services. This information, except for your religious affiliation, may be released to people who ask for you by name. Your religious affiliation may be given to members of the clergy, such as a minister, priest, or rabbi. If you do not want to be included in our facility directory, or if you want to restrict the information we include in the directory, you must notify the Director of Case Management Services, St. Coletta of Wisconsin, N4637 County Road Y, Jefferson, WI 53549, of your objection.

Disclosures to Family and Others. We may disclose your health information to your parent/guardian, personal representative, family member, other relative, a close personal friend, or any other person identified by you. We will only disclose information that is directly relevant to that person's involvement with the services and supports you receive or payment for those services and supports. We may also use or disclose health information about you to notify, or assist in notifying, those persons of your location, general condition, or death. If you want to disallow someone you have identified, please notify the Director of Case Management Services, St. Coletta of Wisconsin, N4637 County Road Y, Jefferson, WI 53549, or tell the person who is providing care to you.

Required by Law or Disaster Relief. We may use or disclose your health information when we are required to do so by law. We may also use or disclose your health information to a public or private entity authorized by law or by its charter to assist in disaster relief efforts. This will be to coordinate with those entities in notifying a parent/guardian, personal representative, family member, other relative, close personal friend, or other person identified by you of your location, general condition, or death.

Judicial and Administrative Proceedings. We may disclose your health information when required by a judicial or administrative proceeding in response to an order of the court or administrative tribunal, or in response to a subpoena, discovery request, or other legal process.

Public Health Activities. We may disclose your health information for legally required public health activities and purposes. This could be for purposes of preventing or controlling disease, or about child abuse and neglect or for purposes related to the quality, safety, or effectiveness of a United States Food and Drug Administration-regulated product or activity.

Victims of Abuse, Neglect, or Domestic Violence. We may disclose your health information to a government authority legally authorized to receive reports of abuse, neglect, or domestic violence, if we believe you are a victim of abuse, neglect, or domestic violence.

Health Oversight Activities. We may disclose your health information to a health oversight agency if legally required for audits, investigations, inspections, licensure or disciplinary actions. These and similar types of activities are required for appropriate oversight of the health care system, government benefit programs, and entities subject to various government regulations.

Coroners, Medical Examiners, and Funeral Directors. We may disclose your health information to a coroner or medical examiner or Funeral Director as necessary for them to carry out their duties.

Organ, Eye, or Tissue Donation. If you or your legal representative have authorized such a donation, we may disclose your health information to facilitate organ, eye, or tissue donation and transplantation to organ procurement organizations or other entities engaged in the procurement, banking, or transplantation of organs, eyes, or tissue.

To Avert Serious Threat to Health or Safety. We may use or disclose your health information if we believe it is necessary to prevent or lessen a serious or imminent threat to the health or safety of a person or the public.

Your Rights With Respect to Your Health Information

You have the following rights with respect to your health information that we maintain:

Right to Receive Confidential Communications. You or your legal representative have the right to request your health information and that it is sent to you in a certain way or at a certain location. For example, you can ask that we only contact you by email or by US postal mail. You are not required to tell us why you are asking for the confidential communication.

Please send your request, which must be in writing, to the Director of Case Management Services, St. Coletta of Wisconsin, N4637 County Road Y, Jefferson, WI 53549.

Right to Request Restrictions. You or your legal representative have the right to request that we restrict the uses or disclosures of health information about you to carry out treatment, payment, or health care operations unless it is required by law. For example, you could ask that we not disclose health information about you to your brother or sister. You or your legal representative may request or withdraw a restriction at any time. It must be a written request to the Director of Case Management Services, St. Coletta of Wisconsin, N4637 County Road Y, Jefferson, WI 53549, telephone 920/674-8334,

Right to Amend. You have the right to ask us to amend your health information which St. Coletta has documented. We will review your request and if it is approved, we will revise your health information. If it isn't approved, you will be notified of the reason(s). You also have the right to add a statement to your health information for as long as the health information is maintained by us.

Your request must be in writing and sent to the Director of Case Management Services, St. Coletta of Wisconsin, N4637 County Road Y, Jefferson, WI 53549.

Right to an Accounting of Disclosures. You have the right to receive information about any disclosures of your health information to other entities during the prior six (6) years except those required for legal or healthcare oversight agency purposes. The accounting may be for up to six (6) years prior to the date on which you request the accounting but not before April 14, 2003.

Please submit your request in writing to the Director of Case Management Services, St. Coletta of Wisconsin, N4637 County Road Y, WI 53549.

Right to Copy of this Notice. You may request a copy of our *Notice of Privacy Practices* at any time as follows:

Over the Internet at our web site, www.stcolettawi.org.

From our Director of Case Management Services, St. Coletta of Wisconsin, N4637 County Road Y, Jefferson, WI 53549, telephone 920/674-8334.

Our Duties

Generally. We are required by law to maintain the privacy of your health information and to provide you and other individuals with notice of our legal duties and privacy practices with respect to health information. We are required to abide by the terms of our *Notice of Privacy Practices* in effect at the time, and its effective date will be specified.

Our Right to Change *Notice of Privacy Practices*. We reserve the right to change this *Notice of Privacy Practices* at any time and for any reason

Availability of *Notice of Privacy Practices*. A copy of our current *Notice of Privacy Practices* will be posted on our web site, www.stcolettawi.org. A copy may also be obtained by writing to our Director of Case Management Services, St. Coletta of Wisconsin, N4637 County Road Y, Jefferson, WI 53549, telephone 920/674-8334.

Complaints. You may complain to us and/or to the United States Secretary of Health and Human Services if you believe your privacy rights have been violated by us. You will not be retaliated against for filing a complaint.

To file a complaint with us, please write our Director of Human Resources, St. Coletta of Wisconsin, N4637 County Road Y, Jefferson, WI 53549. To file a complaint with the United States Secretary of Health and Human Services, send your complaint to him/her in care of: Office for Civil Rights, U.S. Department of Health and Human Services, 200 Independence Avenue SW, Washington, D.C. 20201.

Questions and Information. If you have any questions or want more information about our *Notice of Privacy Practices*, please contact the Director of Case Management Services, St. Coletta of Wisconsin, N4637 County Road Y, Jefferson, WI 53549, telephone 920/674-8334