

GATEWAY REHABILITATION CENTER (GR)
NOTICE OF PRIVACY PRACTICES
The effective date of this Notice is December 27, 2018.

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

If you have questions about this Notice, please contact our Privacy Officer:

Pamela Ramsey, V.P. Operations and Compliance
Pamela.Ramsey@gatewayrehab.org
(412) 604-8900, extension 1114

Your patient record contains personal information about you and your health. The confidentiality of alcohol and drug abuse patient records is specifically protected by state and federal laws. This Notice of Privacy Practices describes how GR may use and disclose your protected health information ("PHI"), as well as your rights regarding your PHI. We reserve the right to change the terms of this Notice at any time by posting a copy on our website <http://www.gatewayrehab.org> or by posting a copy at our facilities. You may request a copy of the Notice at any time.

Note: Some of the rights detailed below may not apply to you if you are an inmate in a correctional facility or are in lawful custody.

How We May Use and Disclose Health Information about You

Listed below are examples of the uses and disclosures that GR may make of your PHI. The disclosure may be made verbally, in writing, or electronically, such as by email or text message.

Treatment. We may use your PHI to provide, coordinate, or manage your care and any related services including sharing information with others outside of GR that we are consulting with or referring you to for your care, such as a specialist or a laboratory.

Payment. Generally, we will obtain your authorization to use your PHI to obtain payment for your services. We may use or disclose your PHI for such reasons as determining if you have insurance benefits, and if they will cover your treatment, processing claims with your insurance company, reviewing services provided to you to determine medical necessity, or undertaking utilization review activities.

Healthcare Operations. We may use or disclose your PHI, as needed, to coordinate our business activities and to share PHI with third parties that provide services to us such as billing or computer services, quality assessment activities, employee review activities, training of students, or other services who have entered into agreements promising to maintain the confidentiality of your PHI.

Contact with our Patients. We may use or disclose your PHI for patient activities and to contact you. We may also use a sign-in sheet at the registration desk where you will be asked to sign your name and indicate your physician or counselor. We may also call you by name in the waiting room when it is time to be seen. We may contact you by phone or text to remind you of your appointments. We may leave voice messages at the telephone number you provide to us. If you choose to have us contact you by text, texting charges may apply. If we contact you, you can tell us to contact you in another way or opt out of future contacts. We may contact you to provide information to you about treatment alternatives or other health-related benefits and services that may be of interest to you, or regarding GR's fundraising activities. Any fundraising materials will explain how you can inform us that you do not want to be contacted in the future. We will format any mailings to you in a way that does not identify you as a substance abuse treatment client.

Required by Law. We may use or disclose your PHI if it is required by law. For example, we must make disclosures of your PHI to you upon your request and we must make disclosures to the Secretary of the Department of Health and Human Services for the purpose of investigating or determining our compliance with the Privacy Rule. We may also disclose your PHI if a court issues a subpoena and appropriate order and follows required procedures.

Health Oversight. We may disclose PHI to a health oversight agency for activities authorized by law, such as audits, investigations, licensure and accreditation inspections. Oversight agencies seeking this information include government agencies and organizations that provide financial assistance to GR (such as third party payers) and peer review organizations performing utilization and quality control.

Medical Emergencies. We may use or disclose your PHI in a medical emergency situation to medical personnel only.

Child Abuse or Neglect. We may disclose your PHI to a state or local agency as authorized by law to receive reports of child abuse or neglect. We only disclose necessary information to make the initial mandated report.

Deceased Clients. We may disclose PHI of deceased clients for the purpose of determining the cause of death, in connection with laws requiring the collection of death or other vital statistics, or permitting inquiry into the cause of death.

Research. Information that has no identifying information or is part of a limited data set may be used for research purposes without your authorization. PHI may only be disclosed for research purposes after a special approval process or with your authorization.

Court Order. We may disclose your PHI if the court issues an appropriate order and follows required procedures.

Law Enforcement. We may disclose your PHI to law enforcement officials if you have committed a crime on program premises or against program personnel.

Public Health. We may use or disclose your PHI in certain limited circumstances to a public health authority authorized by law to collect or receive such information for purposes of preventing or controlling disease, injury or disability.

Rights Regarding Your PHI

Listed below are your rights. Please contact our Privacy Officer via email if you have any questions.

Inspect and Copy Your PHI. You can view and get a copy of your PHI that is contained in a designated record set for as long as we maintain the record. A “designated record set” contains medical and billing records and any other records that GR uses to make decisions about you. If we maintain a copy of your PHI in an electronic format, then we will provide that PHI to you electronically upon your request. We may charge you a reasonable cost-based fee for the copies. We can deny you access to your PHI in certain circumstances

Amend Your PHI. You may request, in writing, that we amend your PHI in your records. We may deny your request in certain cases. You have a right to file a statement of disagreement with us.

Accounting of PHI Disclosures. You may request an accounting of disclosures for certain other disclosures. We may charge you a reasonable fee if you request more than one accounting in any 12-month period.

Restrictions on Disclosures and Uses of PHI. You have the right to restrict disclosures of PHI to your health plan where you have paid for the services out of pocket and in full. As a convenience to our patients, at some locations we offer text message appointment reminders. There are privacy risks to texting and text messages may be accessed by others. You may opt out of receiving text messages at any time by notifying Medical Records.

Confidential Communications. You have the right to request to receive confidential communications from us by alternative means or at an alternative location. We will accommodate reasonable, written requests. We may also condition this request by asking you for information regarding how payment will be handled or specification of an alternative address or other method of contact.

Breach Notification. If there is a breach of unsecured PHI concerning you, we may be required to notify you of this breach.

Complaints. You may file a complaint in writing to us by notifying our Privacy Officer. We will not retaliate against you for filing a complaint. You may also file a complaint with the U.S. Secretary of Health and Human Services at 200 Independence Avenue, S.W. Washington, D.C. 20201 or by calling 202-619-0257. OCRComplaint@hhs.gov.

Notice to Substance Abuse Patients. The confidentiality of alcohol and drug abuse patient records is protected by federal law 42 USC 290dd-2 and 42 CFR Part 2. Generally, the program may not say to a person outside the program that a patient attends the program, or disclose any information identifying a patient as an alcohol or drug patient, unless: (1) the patient consents in writing; (2) the disclosure is allowed by a court order; (3) the disclosure is made to medical personnel in a medical emergency or to qualified personnel for research, audit, or program evaluation; (4) the patient commits or threatens to commit a crime either at the program or against any person who works for the program. Violation of federal regulations by a program is a crime. Suspected violations may be reported to the Privacy Officer or with Pennsylvania locations, call the Pittsburgh U.S. Attorney’s Office (412-644-3500) or with Ohio locations, call the Youngstown U.S. Attorney’s Office (330-746-7974). Federal law and regulations do not protect any information about suspected child abuse or neglect from being reported under state law to appropriate state or local authorities.

12/27/18