

**DICKINSON CENTER, INC.**  
**NOTICE OF PRIVACY PRACTICES**

**This Notice describes how you/or your child's health information may be used and disclosed by Dickinson Center, Inc. and how you can get access to this information. Please review it carefully.**

**We have a legal duty to safeguard your protected health information.** We will protect the privacy of the health information maintained by us that identifies you, whether it deals with the provision of health care to you or the payment for your health care. We must provide you with this Notice about our privacy practices. It explains how, when, and why we may use and disclose your health information. With some exceptions, we will use or disclose only that part of your health information that is necessary to accomplish the purpose of the use or disclosure. We are legally required to follow the privacy practices that are described in this Notice, which is currently in effect.

Dickinson Center, Inc. reserves the right to change the terms of this Notice and our privacy practices at any time. We will promptly revise and redistribute this Notice whenever there is a material change to the uses and disclosures, your individual rights, our legal duties or other privacy practices herein stated. Any changes made will apply to all of your health information that we maintain. A copy of the revised Notice will be offered to you at your next scheduled visit and will be posted in the reception area of all service programs. You may also request a copy of our current Notice of Privacy Practices at any time, from the receptionist. { You may also view and obtain an electronic copy of this Notice on our website at [www.dickinsoncenter.org](http://www.dickinsoncenter.org)

We would like to take this opportunity to answer some common questions concerning our privacy practices:

**Question: How will Dickinson Center, Inc. use and disclose my protected health information?**

**Answer:** We use and disclose health information for many different reasons. For some of these uses or disclosures, we need your specific authorization. We may redisclose some of your health information that we received from another entity for the purposes of treatment but not without your authorization except in an emergency situation. Below, we describe the different categories of our uses and disclosures and give you some examples of each.

- A. Uses and Disclosures Relating to Treatment, Payment and Healthcare Operations.** We may, by federal law, use and disclose your health information for the following reasons:
1. **For Treatment:** Dickinson Center, Inc. will share your health information within the program where you are receiving services but limit this practice only for the purpose of treatment, payment and health care operations. If you receive service at more than one Dickinson Center program, health information will be shared between these programs only with your authorization. Health information used or disclosed for this purpose will be limited to the minimum necessary for that purpose. With the possible exception of information concerning behavioral health disorders and/or treatment, drug and alcohol abuse and/or treatment, and HIV status (for which we may need your authorization), we may disclose your general health information to other health care providers who are involved in your care. For example, we may disclose your medical history to a hospital if you need medical attention while at our facility, or for referral to a residential care program. Reasons for a disclosure may be: to get them the medical history information they need to appropriately treat your condition, to coordinate your care or to schedule necessary testing.
  2. **To Obtain Payment for Treatment:** With the possible exception of some specific information concerning behavioral health disclosures and/or treatment, drug and alcohol abuse and/or treatment, and HIV status (for which we may need your specific authorization), we may use and disclose necessary health information in order to bill and collect payment for the treatment we have provided to you. For example, we may provide certain portions of your health information to your health insurance company, Medicare or Medicaid, in order to get paid for taking care of you. The disclosure of Protected Health Information to your health plan will be restricted if you pay in full out of pocket for the services you have received at the time the service is provided.
  3. **For Health Care Operations:** We may, at times, need to use and disclose your health information to run our organization. For example, we may use your health information to evaluate the quality of treatment that our staff has provided to you. We may also need to provide some of your health information to our accountants, attorneys and consultants in order to make sure that we're complying with law; for specific information concerning behavioral health disorders and/or treatment, drug and alcohol abuse and/or treatment, and/or HIV status, we may be further limited in what we provide and may be required to first obtain from you specific authorization.
- B. Certain Other Uses and Disclosures are Permitted by Federal Law.** We may use and disclose your health information without your authorization for the following reasons:
1. **When a Disclosure is Required by Federal, State or Local Law, in Judicial or Administrative Proceedings or by Law Enforcement.** For example, we may disclose your protected health information if we are ordered by a

court, or if a law requires that we report that sort of information to a government agency or law enforcement authorities, such as in the case of a dog bite, suspected child abuse or a gunshot wound.

2. **For Public Health Activities.** Under the law, we need to report information about certain diseases, and anything about deaths, to government agencies that collect that information. With the possible exception of information concerning behavioral health disorders and/or treatment, drug and alcohol abuse and/or treatment and HIV status (for which we may need your specific authorization), we are also permitted to provide some health information to the coroner or a funeral director, if necessary, after a client's death.
3. **For Health Oversight Activities.** For example, we will need to provide your health information if requested to do so by the County and/or State when they oversee the program in which you receive your care. We will also need to provide information to government agencies that have the right to inspect our offices and/or investigate healthcare practices.
4. **To Avoid Harm.** If one of our counselors, physicians or nurses believes that it is necessary to protect you, or to protect another person or the public as a whole, we may provide protected health information to the police or others who may be able to prevent or lessen the possible harm.
5. **For Specific Government Functions.** With the possible exception of information concerning behavioral health disorders and/or treatment, drug and alcohol abuse and/or treatment and HIV status (for which we may need your specific authorization), we may disclose the health information of military personnel or veterans where required by U.S. military authorities. Similarly, we may also disclose a client's health information for national security purposes, such as assisting in the investigation of suspected terrorists who may be a threat to our nation.
6. **For Workers Compensation.** We may provide your health information as described under workers' compensation law, if your condition was the result of a workplace injury for which you are seeking workers' compensation.
7. **Appointment Reminders and Health Related Benefits or Services.** Unless you tell us that you would not prefer to receive them, we may use or disclose your information to provide you with appointment reminders.
8. **Fundraising Activities.** For example, if Dickinson Center, Inc. chose to raise funds to support one or more of our programs or facilities, or some other charitable cause or community health education program, we may use the information that we have about you to contact you. If you do not wish to be contacted as part of any fundraising activities, please contact Mike Fernan at 776-2145.

**C. The Sale of Protected Health Information is prohibited without your written authorization with the following exceptions:**

1. For public health purposes.
2. For research purposes where the only remuneration received is a reasonable, cost-based fee to cover the cost to prepare and transmit the protected health information for such purposes.
3. For treatment and payment purposes.
4. For the sale, transfer, merger or consolidation of all or part of the Covered Entity and related due diligence.
5. To an individual, when requested under the access and accounting of disclosures provisions of the Privacy Rule.
6. For disclosures required by law.

The only remuneration received by Dickinson in any of these instances is a reasonable, cost-based fee to cover the cost of preparing and transmitting protected health information for such a purpose or a fee otherwise expressly permitted by other law.

**D. The Use of Protected Health Information for marketing purposes is prohibited without your written authorization.**

**E. Certain Uses and Disclosures Require You to Have the Opportunity to Object.**

1. **Disclosures to Family, Friends or Others Involved in Your Care.** We may provide a limited amount of your health information to a family member, friend or other person known to be involved in your care or in the payment for you care, unless you tell us not to. For example, if a family member comes with you to your appointment and you allow them to come into the treatment room with you, we may disclose otherwise protected health information to them during the appointment, unless you tell us not to. (This information may not contain information about behavioral health disorders and/or treatment, drug and alcohol abuse and/or treatment and HIV status, without your specific verbal authorization which will be verified in your record).
2. **Disclosures to notify a Family Member, Friend or Other Selected Person.** When you first started our program, we asked that you provide us with an emergency contact person in case something should happen to you while you are at our facilities. Unless you tell us otherwise, we will disclose certain limited health information about you (your general condition, location, etc.) to your emergency contact or another available family member, should you need to be admitted to the hospital, for example. (This information may not contain information about behavioral health disorders and/or treatment, drug and alcohol abuse and/or treatment and HIV status, without your specific authorization.)

**F. Other Uses and Disclosures Require Your Prior Written Authorization.** In situations other than those categories of uses and disclosures mentioned above, or those disclosures permitted under federal law, we will ask for your written authorization

before using or disclosing any of your protected health information. In addition, we need to ask for your specific written authorization to disclose information concerning your behavioral health, drug and alcohol abuse and/or treatment, or to disclose your HIV status.

If you choose to sign an authorization to disclose any of your health information, you can later revoke it to stop further uses and disclosures to the extent that we haven't already taken action relying on the authorization, so long as it is revoked in writing.

**Question: What Rights Do I Have Concerning My Protected Health Information?**

**Answer:** You have the following rights with respect to your protected health information.

- A. **The Right to Request Limits on Uses and Disclosures of Your Health Information.** You have the right to ask us to limit how we use and disclose your health information. We will certainly consider your request, but you should know that we are not required to agree to it. If we do agree to your request, we will put limits in writing and will abide by them, except in the case of an emergency. Please note that you are not permitted to limit the uses and disclosures that we are required or allowed by law to make.
- B. **The Right to Choose How We Send Health Information to You or How We Contact You.** You have the right to ask that we contact you at an alternate address or telephone number (for example, sending information to your work address instead of your home address) or by an alternate means (for example, by mail instead of telephone). We must agree to your request so long as we can easily do so.
- C. **The Right to See or to Get a Copy of Your Health Information.** In most cases, you have the right to look at or get a copy of your health information which is a part of your medical record set, but you must make the request in writing. A request form is available at the receptionist desk or from your service provider. We will respond to you within 30 days after receiving your written request. If we do not have the health information that you are requesting, but we know who does, we will tell you how to get it. In certain situations, we may deny your request. If we do, we will tell you, in writing, our reasons for the denial. In certain circumstances, you may have a right to appeal the decision.

If you request a copy of any portion of your protected health information, we will charge you for the copy only as allowed under Pennsylvania State law. You may request an electronic copy of that portion of your protected health information that is maintained electronically. This will be provided in the form or format requested by you if readily producible, or if not, in a readable electronic form and format as agreed by Dickinson Center and you with associated costs being charged to you. We need to require that payment be made in full before we will provide the copy to you. If you agree in advance, we may be able to provide you with a summary or an explanation of your records instead. There will be a charge for the preparation of the summary or explanation.

- D. **The Right to Receive a List of Certain Disclosures of Your Health Information That We or Our Business Associates Have Made.** You have the right to get a list of certain types of disclosures that we or our Business Associates have made of your health information. This list would not include uses or disclosures for treatment, payment or healthcare operations, disclosures to you or with your written authorization, or disclosures to your family for notification purposes or due to their involvement in your care. This list also would not include any disclosures made for national security purposes, disclosures to corrections or laws enforcement authorities if you were in custody at the time, or disclosures made prior to April 14, 2003. You may not request an Accounting for more than a six (6) year period.

To make such a request, we require that you do so in writing; a request form is available upon asking at the receptionist desk or from your service provider. We will respond within 60 days of receiving your request. The list that you may receive will include the date of the disclosure, the person or organization that received the information (with their address if available), a brief description of the information disclosed, and a brief reason for the disclosure. We will provide such a list to you at no charge; but, if you make more than one request in the same twelve month period, you will be charged \$15.00 for each additional request within that year.

- E. **The Right to be Notified When a Breach of Your Health Information has occurred.** If a verified breach of your unsecured protected health information has occurred, you will be notified in written form within 60 days.
- F. **The Right to Ask to Correct or Update Your Health Information.** If you believe that there is a mistake in your health information or that a piece of important information is missing, you have a right to ask that we make an appropriate change to your information. You must make the request in writing, with the reason for your request, on a request form that is available at the receptionist desk or from your service provider. We will respond within 60 days of receiving your request. If we approve your request, we will make the change to your health information, tell you when we have done so, and will tell others that need to know about the change.

We may deny your request if the protected health information: (1) is correct; (2) was not created by us; (3) is not allowed to be disclosed to you; or (4) is not part of our records. Our written denial will state the reasons that your request was denied

and explain your right to file a written statement of disagreement with the denial. If you do not wish to do so, you may ask that we include a copy of your request form, and our denial form, with all future disclosures of that health information.

- G. The Right to Opt out of receiving fundraising communications.** If you do not wish to be contacted as part of any fundraising activities, please contact Mike Fernan @ 776-2145.
- H. The Right to Get a Paper Copy of This Notice including all updates.** If you have agreed to receive this Notice via e-mail, you will always have the right to request a paper copy of this Notice. You may view an electronic copy of this Notice at our website, [www.dickinsoncenter.org](http://www.dickinsoncenter.org)

**Question: How Do I Complain or Ask Questions about This Organization’s Privacy Practices?**

**Answer:** If you have any questions about anything discussed in this Notice or about any of our privacy practices, or if you have any concerns or complaints, please contact the HIPAA Privacy Officer at 776-2145. You may register a verbal complaint or complete a Privacy Complaint Form which is available at the reception desk at all Program sites or from your service provider. If you file a complaint, it authorizes us to conduct an investigation in order to validate the complaint and correct any violation. You also have the right to file a written complaint with the Secretary of the U.S. Department of Health and Human Services. We may not take any retaliatory action against you if you lodge any type of complaint.

**Question: When Does This Notice Take Effect?**

**Answer:** This Notice takes effect on September 23, 2013

**Adopted:**

**Effective: 09/23/13**