

NOTICE OF PRIVACY PRACTICES

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

ConferMED, PC and ConferMED of California, PC (collectively “ConferMED”), which operate as an affiliated covered entity, respect the privacy and confidentiality of your health information. This Notice of Privacy Practices (“Notice”) describes how we may use and disclose your health information and how you can get access to this information. This Notice applies to uses and disclosures we may make of all your health information whether created or received by us.

I. Our Responsibilities to You

We are required by law to: (1) maintain the privacy of your health information and to provide you with notice of our legal duties and privacy practices; and (2) comply with the terms of our current Notice.

We reserve the right to change our practices and to make the new provisions effective for all health information we maintain. Should we make material changes, revised notices will be made available on ConferMED’s website. Copies of the revised notice will also be available by mail from the Privacy Officer.

II. How the Community Health Center, Inc. May Use or Disclose Your Health Information

A. For Treatment, Payment and Healthcare Operations

1. *For Treatment.* ConferMED may use and disclose your health information to provide you with treatment and services and to coordinate your continuing care. Your health information may be used by doctors, counselors, dentists, and nurses, as well as by lab technicians, dieticians, specialists or others involved in your care, both within and outside ConferMED. For example, your primary care provider may request that our specialist share his or her evaluation of your condition with another provide to make sure that you get the best treatment possible.

2. *For Payment.* ConferMED may use and disclose your health information to others for purposes of receiving payment for treatment and services that you receive. For example, a bill may be sent to a third-party payor, such as an insurance company or health plan and that bill may contain information that identifies you, your diagnosis, and treatment.

3. *For Health Care Operations.* ConferMED may use and disclose health information about you for operational purposes. For example, your health information may be disclosed to members of our staff or management company to assess quality, evaluate performance, and improve our services.

B. Other Uses and Disclosures We May Make Without Your Written Authorization

1. *Health Care Messages.* If you provided your contact information directly to ConferMED, ConferMED may use your information to send you messages about your health care. You may request that ConferMED not send you messages.

2. *Required by Law.* ConferMED may use and disclose information about you as required by law.

3. *Persons Involved in Your Care or Payment for Your Care.* We may disclose health information about you to a family member, close personal friend or other person you have told us that we can share

information with about you. These disclosures are limited to information relevant to the person's involvement in your care or in arranging payment for your care and will only be made to those individuals you have told us that we may communicate with about you.

4. *Public Health Activities.* We may disclose your health information for public health activities. These activities may include, for example: 1) to prevent and control disease, injury or disability; or 2) to report problems with medications.

5. *Reporting Victims of Abuse, Neglect or Domestic Violence.* If we believe that you have been a victim of abuse or neglect, we may disclose your health information to notify a government authority.

6. *Health Oversight Activities.* We may disclose your health information to a health oversight agency for activities authorized by law. A health oversight agency is a state or federal agency that oversees the health care system. Some of the activities may include, for example, audits, investigations, inspections and licensure actions.

7. *Judicial and Administrative Proceedings.* We may disclose your health information in response to a court or administrative order. We also may disclose information in response to a subpoena, discovery request, or other lawful process.

8. *Law Enforcement.* We may disclose your health information for certain law enforcement purposes, including, for example, to file reports required by law or to report emergencies or suspicious deaths; to comply with a court order, warrant, or other legal process; to identify or locate a suspect or missing person; or to answer certain requests for information concerning crimes.

9. *Coroners, Medical Examiners, Funeral Directors, Organ Procurement Organizations.* We may release your health information to a coroner, medical examiner, funeral director and, if you are an organ donor, to an organization involved in the donation of organs and tissue.

10. *To Avert a Serious Threat to Health or Safety.* When necessary to prevent a serious threat to your health or safety, or the health or safety of the public or another person, we may use or disclose your health information to someone able to help lessen or prevent the threatened harm.

11. *Military and Veterans.* If you are a member of the armed forces, we may use and disclose your health information as required by military command authorities.

12. *National Security and Intelligence Activities; Protective Services for the President and Others.* We may disclose health information to authorized federal officials conducting national security and intelligence activities or as needed to provide protection to the President of the United States, certain other persons or foreign heads of states or to conduct certain special investigations.

13. *Inmates/Law Enforcement Custody.* If you are an inmate of a correctional institution or under the custody of a law enforcement official, we may disclose your health information to the institution or official for certain purposes including your own health and safety as well as that of others.

14. *Workers' Compensation.* We may use or disclose your health information to comply with laws relating to workers' compensation or similar programs.

15. *Disaster Relief.* We may disclose health information about you to an organization assisting in a disaster relief effort.

16. *Treatment Alternatives and Health-Related Benefits and Services.* We may use or disclose your health information to inform you about treatment alternatives and health-related benefits and services that may be of interest to you.

17. *Business Associates.* We may disclose your health information to our business associates under a Business Associate Agreement.

18. *Research.* ConferMED may use your health information for research purposes when an institutional review board or privacy board has reviewed the research proposal, established protocols, and has approved the research to ensure the privacy of your health information.

C. Your Written Authorization is Required for All Other Uses or Disclosures of Your Health Information

1. We will obtain your written authorization (an "Authorization") prior to making any use or disclosure other than those described above. Most uses and disclosures of psychotherapy notes (as defined in 45 CFR §164.501), uses and disclosures of your protected health information that are made for marketing purposes or disclosures that constitute a sale of protected health information require your written authorization.

2. A written Authorization is designed to inform you of a specific use or disclosure (other than those described in Section B above) that we plan to make of your health information. The Authorization describes the health information to be used or disclosed and the purpose of the use or disclosure. Where applicable, the written Authorization will also specify the name of the person to whom we are disclosing the information. The Authorization will also contain an expiration date or event.

3. You may revoke a written Authorization previously given by you at any time, but you must do so in writing. If you revoke your Authorization, we will no longer use or disclose your health information for those purposes specified in the Authorization except where we have already acted in reliance on your Authorization.

D. Your Rights Regarding Your Health Information

1. *Right to Request Restrictions.* You have the right to request that we restrict the way we use or disclose your health information for treatment, payment or health care operations. However, we are not required to agree to the restriction except under limited circumstances. For example, we must agree to your request to restrict disclosures about you to your health plan for purposes of payment or healthcare operations that are not required by law if the information pertains solely to a health care item or service for which you have paid us in full out of pocket. If we do agree to a restriction, we will honor that restriction except in the event of an emergency.

2. *Right to Request Confidential Communications.* You have the right to request that we communicate with you concerning your health matters in a certain manner or at a certain location. For example, you can request that we contact you only at a certain phone number. We will accommodate your reasonable request.

3. *Right of Access to Personal Health Information.* You have the right to inspect and, upon written request, obtain a copy of your health information.

4. *Right to Request Amendment.* You have the right to request that we amend your health information if we created that health information. Your request must be made in writing and must state the

reason(s) for the requested amendment. We may deny your request for amendment under certain circumstances. If we deny your request for amendment, we will give you a written denial notice, including the reasons for the denial. You have the right to submit a written statement disagreeing with the denial which will be included in your health record.

5. *Right to an Accounting of Disclosures.* You have the right to request an accounting of certain disclosures of your health information. You must submit your request in writing and you must state the time period for which you would like the accounting of disclosure. The accounting will include the disclosure date; the name of the person or entity that received the information and address, if known; a brief description of the information disclosed; and a brief statement of the purpose of the disclosure. The first accounting provided within a 12-month period will be free; for further requests, we may charge you our costs for completing the accounting.

6. *Notification of Breaches of Your Health Information.* You have the right to receive written notification of any "breach" of your unsecured protected health information, as that term is defined in 45 CFR §164.402.

E. Special Regulations Regarding Disclosure of Behavioral Health Care, Substance Abuse Treatment and HIV-Related Information

For disclosures concerning certain health information such as HIV-related information or records regarding substance abuse or behavioral health treatment, special restrictions apply. Generally, we will disclose such information only with an Authorization that specifically permits the disclosure of such information, or as otherwise permitted or required by law.

F. For Information About This Notice or to Report A Concern Regarding Our Privacy Practices

1. If you believe that your privacy rights have been violated, you may file a complaint in writing with us or with the Office of Civil Rights in the U.S. Department of Health and Human Services at 200 Independence Avenue, S.W., Room 509 F, HHH Building, Washington D.C. 20201.

2. To file a complaint with us, you should contact:

ConferMED Privacy Officer
631 Main Street
Middletown, CT 06457
privacy@confermed.com or (860) 397-4109

3. We will not retaliate against you in any way for filing a complaint against ConferMED.

Adopted January 2020 (contact information revised November 2022)