Notice of Privacy Practices

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.

This notice applies to all Morehouse Healthcare practices sites.

| Howell Mill Road Office | 1800 Howell Mill Road, Ste. 275 and 550  
Atlanta, GA 30318  
Phone: (404) 756-1400  
Fax: (404) 756-1494 |
|------------------------|---------------------------------------------------|
| Comprehensive Family Healthcare Center | 1513 East Cleveland Avenue, Bldg. 500  
East Point, GA 30344  
Phone: (404) 752-1000  
Fax: (404) 752-1191 |

Georgia law generally requires patient consent for disclosures of protected health information to outside researchers for medical research purposes.

Morehouse Healthcare Duties

By law, Morehouse Healthcare must keep protected health information private. The federal government defines protected health information as any information, whether oral, electronic or paper, which is created or received by Morehouse Healthcare and relates to a patient’s health care or payment for the provision of medical services. This includes not only the results of tests and notes written by doctors, nurses and other clinical personnel, but also certain demographic information (such as your name, address and telephone number) that is related to your health records. Morehouse Healthcare is required by law to give you this notice and to follow the terms and conditions of the notice that is currently in effect.
How Morehouse Healthcare Fulfills These Duties

- Morehouse Healthcare considers patient privacy as part of its mission to serve the needs of the patient first.
- Morehouse Healthcare takes necessary precautions against inappropriate use or disclosure of medical information.
- Morehouse Healthcare employees are expected to access medical information only as necessary to perform their jobs.
- Morehouse Healthcare employees who violate these rules and policies are subject to sanctions, including discipline and termination.

The Health Care Providers Covered By This Notice

This notice covers Morehouse Healthcare and Morehouse Healthcare personnel, volunteers, students, and trainees. The notice also covers other health care providers that come to Morehouse Healthcare’s facilities to care for patients (such as physicians, physician assistants, therapists, and other health care providers not employed by Morehouse Healthcare), unless these other health care providers give you their own notice of privacy practices that describes how they will protect your medical information. Morehouse Healthcare may share your medical information with these other health care providers for their treatment, payment and health care operations. This arrangement is only for sharing information and not for any other purpose.

A Word about Federal and State Law

Federal and state laws require Morehouse Healthcare to protect your medical information and federal law requires Morehouse Healthcare to describe to you how we handle that information. When federal and state privacy laws differ, and the state law is more protective of your information or provides you with greater access to your information, then state law will override federal law. For example, where we have specifically identified additional applicable state law requirements in this notice, the referenced Morehouse Healthcare will follow the more stringent state law requirements.
Part I – MOST COMMON USES AND DISCLOSURES

This section describes the most common circumstances in which Morehouse Healthcare may use or disclose protected health information.

Treatment

Morehouse Healthcare will use and disclose protected health information to provide, coordinate or manage your care. This includes communication and consultation between health care providers - doctors, nurses, technicians and other members of your medical team. This applies to disclosures for treatment purposes to health care providers both within and outside of Morehouse Healthcare. For example, following surgery, your doctor may refer you for rehabilitation. Information will be shared between caregivers to ensure continuity of care.

Payment

Morehouse Healthcare will use and disclose protected health information to create bills and collect payment from insurance companies and you, Medicare and other payers. This may include providing information such as dates of service, symptoms and diagnosis to your insurance company to show that Morehouse Healthcare provided medical services to you. Morehouse Healthcare also may disclose protected health information to another health care provider if such information is needed by the other health care provider to obtain payment for medical services provided to you or to obtain your approval from your health plan to cover payment for a treatment or service.

Health Care Operations

Morehouse Healthcare will use and disclose protected health information if it is necessary to improve the quality of care we provide to patients or to run our health care facilities. These include activities to monitor and improve patient care, license staff to care for patients, prepare for state and federal regulatory reviews, train health care and non-health care professionals, manage health care operations and improve health care services. Here are some examples:

- To reduce the infection rate after a surgery, it would be necessary to look at medical records to determine the rate of infections that occurred.

- To be licensed to do a certain procedure, a doctor may be required to show that he or she has successfully completed a number of procedures under the supervision of another physician.

- A Federal Drug Administration inspector may review patient records in a laboratory to ensure that accurate and complete records are maintained for patient safety

Business Associates

Morehouse Healthcare may disclose health information to our business associates that perform functions on our behalf or provide us with services if the information is necessary for such functions or services. For example, Morehouse Healthcare may utilize the services of a separate entity to
perform billing services. All Morehouse Healthcare business associates are obligated to protect the privacy of your information and are not allowed to use or disclose any information other than as specified in our contract.

**Patient Contact, Treatment and Health Related Benefits and Services and Patient Portal**

Morehouse Healthcare may use and disclose health information to contact you to remind you of an appointment with a physician. Morehouse Healthcare also may use and disclose health information to tell you about alternatives or health-related benefits and services that may of interest to you as well as to provide you the ability to access your information through a web-based patient portal.

**Activities of Our Affiliates**

Morehouse Healthcare may disclose your health information to our affiliates in connection with your treatment or other hospital activities.

**Minors**

If you are a minor (under 18 years old), Morehouse Healthcare will comply with Georgia law regarding minors. We may release certain types of your health information to your parent or guardian, if such release is required or permitted by law.

**Philanthropy**

Morehouse Healthcare may contact you to raise funds to sustain the Morehouse School of Medicine mission. For example, you may receive letters or other publications asking you to consider making a tax-deductible contribution to Morehouse School of Medicine. When conducting fundraising activities, Morehouse School of Medicine may access only your basic demographic information (such as name and contact information) and the dates that you were treated at Morehouse Healthcare. Morehouse School of Medicine does not sell or rent patients’ names or addresses to any organization outside of Morehouse School of Medicine.
Family Members and Others Involved in Your Care

Morehouse Healthcare may disclose relevant protected health information to a family member or friend who is involved with your care. We find that many patients want us to discuss their care with their family members and others to keep them up-to-date on your care, to help you understand your care, to help in handling your bills, or to help in the scheduling of your appointments. In a disaster situation, we also may disclose relevant protected health information to disaster relief organizations to help locate your family members or friends or to inform them of your location, condition or death. If family members or friends are present while care is being provided, Morehouse Healthcare will assume your companions may hear the discussion, unless you state otherwise. If you do not want Morehouse Healthcare to disclose your protected health information to your family members or others who are involved with your care or handling your bills, please inform the person assisting you during registration and/or admission.

Medical Research

Medical research is vital to the advancement of medical science. Federal regulations permit use of protected health information in medical research, either with your authorization or when the research study at Morehouse School of Medicine is reviewed and approved by an Institutional Review Board before any medical research study begins. In some situations, limited information may be used before approval of the research study to allow a researcher to determine whether enough patients exist to make a study scientifically valid.

Part II – OTHER POTENTIAL USES AND DISCLOSURES

This section describes the less common circumstances in which Morehouse Healthcare may use or disclose protected health information.

To Avert a Serious Threat of Harm

Morehouse Healthcare may use and disclose protected health information to alert those able to prevent or lessen a serious and immediate threat to the health or safety of a patient, another person or the public.

Military Personnel and Veterans

If a patient is a current or former member of the United States Armed Forces, Morehouse Healthcare may release protected health information as required by military authorities. Morehouse Healthcare also may release protected health information about foreign military personnel to the appropriate foreign military authority. When the military organization is sponsoring the medical evaluation, the patient’s medical information is shared with both the patient and the sponsoring organization. Patients being evaluated on behalf of the military should be aware of these arrangements.
Workers’ Compensation

Morehouse Healthcare may disclose protected health information for workers’ compensation or similar programs as authorized or required by law. These programs provide benefits for work-related injuries or illness.

Public Health Purposes

Morehouse Healthcare may disclose protected health information for public health purposes. The following are some examples of releases that are allowed for public health purposes:

- to report vital statistics (e.g., births, deaths);
- to report to the federal government adverse reactions to medication or safety problems with FDA-regulated products; and
- to report communicable diseases to local, county, state, and federal health officials.

Health Oversight Activities

Morehouse Healthcare may disclose protected health information to health oversight agencies that oversee our operations or personnel. For example, Morehouse Healthcare may need to disclose protected health information to the state agencies that oversee our health care facilities or licensed health care personnel (e.g., Department of Health, Medical Board, Nursing Board), or the federal agencies that oversee Medicare. These agencies need such information to monitor our compliance with state and federal laws.

Lawsuits and Other Judicial Proceedings

Morehouse Healthcare may disclose protected health information in response to a valid court or administrative order. Morehouse Healthcare also may disclose protected health information in response to certain types of subpoenas, discovery requests or other lawful process.

Law Enforcement Activities

Morehouse Healthcare may disclose protected health information to law enforcement officials. For example, we may release protected health information to law enforcement officials:

- in response to a valid court order, grand jury subpoena, or search warrant;
- to identify a suspect, fugitive or missing person;
- about the victim of a crime under certain limited circumstances;
- about a death believed to be a result of criminal conduct; or
- about a crime committed on Morehouse Healthcare premises.
Coroners, Medical Examiners and Funeral Directors

Morehouse Healthcare may release protected health information to a coroner or medical examiner when necessary to identify the deceased, determine the cause of death or as otherwise authorized by law. Morehouse Healthcare also may release protected health information to a funeral director as necessary to carry out the funeral director’s duties, including arrangements after death.

National Security and Protective Services Activities

Morehouse Healthcare may release protected health information to authorized federal officials for intelligence, counterintelligence or other national security activities authorized by law. Morehouse Healthcare also may disclose protected health information to authorized federal officials so they may provide protection to the President or other authorized individuals.

Required by Law

Morehouse Healthcare will use or disclose protected health information when required by federal, state, or local laws. For example, Morehouse Healthcare is required to report certain gunshot wounds and other injuries that may have resulted from an unlawful act, and abuse or neglect of a child or vulnerable adult. There are also additional legal protections for certain types of protected health information. For example, protected health information about HIV/AIDS and genetic testing results is treated differently than other types of protected health information under certain state laws. Additionally, federally assisted alcohol and drug abuse programs are subject to certain special restrictions on the use and disclosure of alcohol and drug abuse treatment information. To the extent applicable, Morehouse Healthcare would need to get your written permission before disclosing that information to others in many circumstances.

Incidental Uses and Disclosures

There are certain incidental uses or disclosures of your health information that occur while we are providing services to you or conducting our business. For example, a receptionist may need to use your name in a waiting room to call you in to see the doctor for a scheduled appointment. Others in the waiting room may hear your name. Morehouse Healthcare will make reasonable efforts to limit these incidental uses and disclosures.

Uses and Disclosures Pursuant to an Authorization

Except as described in this notice or specifically required or permitted by law, Morehouse Healthcare will not use or disclose your protected health information without your specific written authorization. At times, Morehouse Healthcare may ask you to provide specific written permission to allow Morehouse Healthcare to use or disclose medical information about you. A valid authorization may be revoked in writing at any time. Written revocation of authorization must be submitted to the applicable Morehouse School of Medicine and addressed to the attention of the Health Information Management Director. Once authorization is revoked, Morehouse Healthcare will no longer be allowed to use or disclose protected health information for the purposes described in the authorization except to the extent the Morehouse Healthcare has already taken action based upon the authorization.
Part III – PATIENTS’ RIGHTS WITH RESPECT TO PROTECTED HEALTH INFORMATION

This section describes the rights of Morehouse Healthcare patients to protected health information.

Right to Inspect and Copy

You have the right to inspect and to request a copy of information maintained in Morehouse Healthcare’s designated medical record about you. This includes medical and billing records maintained and used by Morehouse Healthcare to make decisions about your care. To obtain or inspect a copy of your medical information, submit a written request to the attention of the Medical Records Department. Morehouse Healthcare generally may charge a reasonable, cost-based fee to cover the expense of providing copies. Morehouse Healthcare is not permitted under law to charge a fee if the information is needed for treatment purposes. Most patients have full access to inspect and receive a copy of the full medical record.

On rare occasions, Morehouse Healthcare may deny a request to inspect and receive a copy of some information in the medical record. For example, this may occur if, in the professional judgment of a patient’s physician, the release of the information would be reasonably likely to endanger the life or physical safety of the patient or another person.

Right to Request Alternate Methods of Communication

You have a right to request that Morehouse Healthcare communicate with you in certain ways (such as a letter or by phone) or at a certain location. For example, you may ask that we contact you only at home or only at your place of business. In this situation, you may submit a written request to the applicable Morehouse Healthcare specifying the communication method or alternative location being requested. The request should be addressed to the attention of Medical Records Department. Morehouse Healthcare will accommodate reasonable requests. However, if the request could result in Morehouse Healthcare not being able to collect for services, Morehouse Healthcare reserves the right to require you to provide additional information about how payment for services will be handled.

Right to Request Amendment

You have the right to request that your protected health information in Morehouse Healthcare’s designated medical record for you be amended. If you wish to request amendment of the information in your record, submit a written request to the Medical Records Department. The request must include a reason to support the amendment. Morehouse Healthcare may deny a request for amendment based upon any of the following circumstances:

- the request is not in writing or does not include a supporting reason;
- the information you want to change was not created by Morehouse Healthcare, and the originator of the information is available to make the amendment;
- the information is not part of the designated medical record; or
- the information in the record is accurate and complete.
If Morehouse Healthcare denies your request for an amendment, Morehouse Healthcare will give you a written explanation of the denial. If you still disagree with the explanation provided, you can submit your written disagreement to Morehouse Healthcare as referenced above, or you can ask that your request for amendment and explanation of the denial be included in any future disclosure of the pertinent protected health information. If you submit a statement of disagreement, Morehouse Healthcare may include a rebuttal statement addressing your statement of disagreement in the designated medical record.

**Right to a List of Certain Disclosures**

You can ask Morehouse Healthcare for a list of the persons or organizations to which Morehouse Healthcare has disclosed your protected health information. This list would provide you with a summary of certain disclosures Morehouse Healthcare has made that you would not otherwise be in a position to know about. The following are examples of disclosures that would not be included in the list:

- disclosures to carry out treatment, payment and health care operations;
- disclosures made directly to you (the patient) or disclosures that you have specifically authorized;
- disclosures made from the facility directory/patient census;
- disclosures to persons involved in your care;
- disclosures incident to a use or disclosure that is otherwise permitted or required by law;
- disclosures made for national security or intelligence purposes;
- disclosures made to correctional institutions or law enforcement officials having custody over a patient; or
- disclosures that took place before April 14, 2003.

To get a copy of the list, submit a written request to the attention of the Medical Records Department. Your request must state a time period (beginning no earlier than April 14, 2003 when the federal privacy rules go into effect and for no longer than six years). The first list requested within a 12-month period shall be provided at no charge. For additional lists requested during the same 12-month period, Morehouse Healthcare may charge for the costs of providing the list.

**Right to Request Restrictions or Limitations**

You can ask Morehouse Healthcare to restrict the use or disclosure of protected health information about you for treatment, payment or health care operations. Your request must be in writing and submitted to Morehouse Healthcare. The request should also be addressed to the attention of the Medical Records Department. 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 adult children. Morehouse Healthcare will carefully
consider all requests. However, because of the integrated nature of Morehouse Healthcare’s medical record, Morehouse Healthcare is not generally able to honor most requests, nor is Morehouse Healthcare legally required to do so.

Right to a Paper Copy of This Notice

You have the right to a paper copy of this notice. You may request 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. To obtain a paper copy of this notice, please contact the below-referenced Privacy Officer.

Changes to this Notice

Morehouse Healthcare reserves the right to change this notice and to make the new notice apply to health information already obtained as well as any information received in the future. A new notice will contain an effective date for implementation.

Complaints and More Information

If you want to file a complaint or express concerns about Morehouse Healthcare’s use or disclosure of protected health information or if you have any questions, or would like to discuss this in more detail, please contact:

Morehouse School of Medicine
Mr. Keith Henderson, Privacy Officer
720 Westview Drive
NCPC 419
Atlanta, GA 30310
Telephone: 404-756-6710

You also may file a written complaint with the United States Department of Health and Human Services – Office of Civil Rights. Morehouse Healthcare honors your right to express concerns regarding your privacy. Morehouse Healthcare would not - nor could it legally or ethically - take action against you for filing a concern or complaint regarding the use or disclosure of your health information. Morehouse Healthcare reserves the right, however, to take necessary and appropriate action to maintain an environment that serves the best interests of its patients and providers.