We at Eye Disease Consultants, LLC understand that your medical/health information is personal and in order. In providing you with quality care and to ensure compliance with certain legal requirements, we create a record of the care you receive in our office(s). We respect the privacy and confidentiality of medical/health information about you and that can be identified with you. This is called “protected health information” (PHI). Your PHI is contained in the medical and billing records maintained by our practice. It includes demographically identifiable information that relates to your present, past, or future physical or mental health and related health care services.

This Notice of Privacy Practices (“Notice”) describes the ways in which we may use and disclose your protected health information. It also describes our duties and our legal obligations with respect to your PHI. This Notice applies to uses and disclosures we may make of all of your PHI, whether created by us in our practice or received by us from another health care provider.

A. OUR LEGAL DUTY TO PROTECT YOUR HEALTH INFORMATION

Federal and State Laws require us to:
• Ensure the confidentiality of your PHI, which we have either created in our practice or received from another health care provider, whether it was created by you at our past, present, or future health care condition;
• Maintain the privacy of your PHI regarding payment for your health care services;
• Explain in the manner in which we may use and disclose your PHI;
• Abide by the terms of this Notice, as currently in effect; and
• Obtain your written authorization to use or disclose your PHI for purposes other than those listed below and permitted by law.

CHANGES TO THE NOTICE
We reserve the right to change this Notice at any time in the future, and make the new provisions effective for all protected health information we maintain, regardless of when it was created or received. If the Notice is amended, we will:
• Post the revised Notice, with the new effective date, in our office(s);
• Post the revised Notice on our website
www.eyediseaseconsultants.com;
• Make copies of the revised Notice available to you upon request.

INCIDENTAL DISCLOSURES
In the course of using or disclosing your PHI for an authorized use, we may make incidental disclosures. We will take reasonable steps to limit incidental disclosures.

I. WE MAY USE AND DISCLOSE YOUR PHI FOR TREATMENT, TO OBTAIN PAYMENT FOR SERVICES RENDERED TO YOU, AND FOR QUALITY CONTROL OPERATIONS.

1. For Treatment:
We may use and disclose your PHI to provide you with medical treatment and services, and to coordinate or manage your health care and related services. We may disclose your PHI to our doctors and nurses, and to any other party involved in your care, either within our practice or an outside health care provider. We may also disclose your PHI to providers or facilities who may be involved in your care after you leave our care. We may also disclose information to people involved in your care such as family members.

A. practice-specific example: Our health care providers may disclose information about you to your referring physician, a pharmacist, or a laboratory.

2. For Payment:
We may use and disclose your PHI to bill and receive payment for the treatment and services we provide. We may disclose your PHI to a third party payer, such as Medicare, Medicaid, or any other third party payer. We may also disclose PHI to collection departments, consumer reporting agencies or any other health care provider who requests information necessary for them to collect payment.

A. practice-specific example: We may inform your insurance company about a treatment you are about to receive so that we can obtain the appropriate approvals and/or to confirm coverage for your treatment.

3. For Health Care Operations:
We may use and disclose your PHI as necessary for us to operate our medical practice. We may use and disclose your PHI for internal operations, such as quality improvement activities and quality assurance programs. We may use and disclose your PHI:
• To review and improve the quality of care you receive;
• To train and educate doctors, nurses, students, volunteers or other medical staff including presentations of chart information and photographs at medical meetings;
• To plan for services, such as when we assess certain services that we may want to offer in the future;
• To evaluate the performance of our employees; to our lawyers, consultants, accountants, and other business associates;
• In order to compare your information with that of several other patients to develop new services or if new treatments were effective;
• To identify groups of patients who have similar health problems or to give them information about treatment alternatives, programs, or new procedures;
• To organizations that assess the quality of care we provide to our patients (such as government agencies or accrediting bodies);
• To organizations that evaluate, certify or license health care providers, staff or facilities in a particular specialty;
• If we are in the process of selling our business or merging with another health care entity, or giving control to someone else;
• For procedures involving health care fraud and abuse detection and control activities;
• To develop internal protocols.

Practice-specific example: We may disclose information as it relates to health care operations to accountants who are auditing our billing records. We may leave messages on your answering machine, send appointment reminder postcards, call to remind you of an appointment.

C. WE MAY USE AND DISCLOSE YOUR PHI WITHOUT YOUR AUTHORIZATION IN LIMITED SITUATIONS.

The following are situations in which we may use or disclose your PHI without your written authorization or an opportunity for you to object:

1. As Required by Law:
We may disclose your PHI when required to do so by federal, state or local law or other judicial or administrative proceedings.

2. Emergencies:
We may use or disclose PHI as necessary in emergency treatment situations.

3. Public Health Risk:
We may disclose your PHI for public health activities. For example, we may disclose PHI about you if you have been exposed to a communicable disease or may otherwise be at risk of spreading a disease. Other examples may include reports about injuries or disability, reports of births and deaths, reports of child abuse and/or neglect and reports regarding the recall of products.

4. At Your Request:
Unless you object, we may use and disclose certain limited PHI about you except to the extent that the request is inconsistent with the privacy practices described in this Notice. You may make such a request in writing. You may also request that providers who work with your PHI identify, including clergy, who is involved in your care. These disclosures are limited to information relevant to the person’s involvement in your care or in payment for your care.

5. Individuals Involved in Your Care or Payment for Your Care:
Unless you object, we may disclose your PHI to a family member, relative, close personal friend or any other person you identify, including clergy, who is involved in your care. These disclosures are limited to information relevant to the person’s involvement in your care or in payment for your care.

6. Reporting Violation of Health Care Legislation:
When authorized by law, or if you agree to the report, and if we believe that you have been exposed to a threat, we may use and disclose your PHI to a government authority.

7. Health Oversight Activities:
When authorized by law, we may disclose your PHI to a health oversight agency for activities, such as audits, investigations, inspections, licensure actions or other legal proceedings. A health oversight agency is a state or federal agency that oversees the health care system.

8. Judicial and Administrative Proceedings:
We may disclose your PHI in response to a subpoena, a discovery request, or any other lawful process by another party involved in the action. We will make a reasonable effort to inform you about the request.

9. Law Enforcement:
We may disclose your PHI for certain law enforcement purposes, including, but not limited to:
• Reporting certain types of wounds and/or other physical injuries (e.g. gunshot wounds);
• Reports required by law;
• Reporting emergencies or suspicious deaths;
• Complying with a court order, warrant, subpoena (in certain circumstances), or other legal process;
• Identifying or locating a suspect or missing person, material witness or fugitive;
• Abusing the death of a person involved in a crime;
• Reporting criminal conduct that took place on our premises; and
• In emergency situations to report a crime, the location of the crime or victim, the identity, description and/ or location of a person involved in the crime.

10. Organ/Tissue Donation Organizations:
If you are an organ donor, we may disclose your PHI to an organization involved in the donation of organs and tissues to enable them to carry out their lawful duties.

11. Research:
In some situations, PHI may be used for research purposes provided that the privacy and safety aspects of the research have been reviewed and approved by an institutional review board or other governing body. The hospital must have established procedures to ensure that your PHI remains confidential.

12. To Avert a Serious Threat to Health or Safety:
We may use or disclose PHI to a family member, relative, close personal friend or any other person you identify, including clergy, who is involved in your care. These disclosures are limited to information relevant to the person’s involvement in your care or in payment for your care.

13. Military and Veterans:
If you are a member of the armed forces, we may use and disclose your PHI as required by military command authorities. We may also disclose your PHI to the appropriate foreign military authority if you are a member of a foreign military.

14. National Security and Intelligence Activities:
We may disclose your PHI if we believe it is necessary to prevent a serious threat to your health or safety or the health or safety of the public or another person. We may only make the disclosure if we believe it is necessary to prevent a serious threat to your health or safety or the health or safety of the public or another person. We may only make the disclosure if we believe it is necessary to prevent a serious threat to your health or safety or the health or safety of the public or another person.

15. Organ/Tissue Donation Organizations:
If you are an inmate of a correctional institution or under the custody of a law enforcement official, we may disclose your PHI to the correctional institution or law enforcement official for the following purposes:

Effective Date of this Notice: 9/15/03
Privacy Contact Officer – Telephone Number: (860) 549-2020
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.
• To enable the correctional institution or law enforcement official to provide you with necessary health care services.

• To protect your own health and safety; and/or

• For the safety and security of the correctional institution.

16. Worker’s Compensation: We may use or disclose your PHI to comply with laws and regulations relating to workers’ compensation or similar programs established by law that provide for work-related injuries and/or illnesses.

17. Treatment Alternatives and Health-Related Benefits and Services: We may use or disclose your PHI to inform you about treatment alternatives and health-related benefits and services that may be of interest to you. This may include telling you about:

• treatments;

• services and products;

• other health care providers;

• special programs; and

• nutritional services.

18. Business Associates: Your PHI may be disclosed to others as business associates under Business Associate Agreements. Business associates may include:

• Answering Services;

• Transcription Services;

• Accounting Services;

• Attorney/Legal Services.

D. YOUR AUTHORIZATION IS REQUIRED FOR ALL OTHER USES AND DISCLOSURES OF YOUR PHI.

Except for those circumstances listed above, we will use and disclose your PHI for the purposes covered by that authorization, except where we have already relied on the authorization.

E. YOUR RIGHTS REGARDING YOUR PROTECTED HEALTH INFORMATION.

You have the following rights regarding your PHI that we maintain:

1. The Right to Access Your Protected Health Information:

Exempt under limited circumstances, and upon written request, you have the right to inspect and obtain a copy of your PHI.

Your PHI is contained in our medical and billing records or any other record used by us to determine your eligibility for health care payments.

Under current state law, we may charge you no more than 0.45 cents per page, plus first-class postage, if we make a copy of your PHI, to cover our costs of duplicating and mailing the record.

We may deny your request to inspect or receive copies of your PHI in the following limited circumstances:

• The protection of the patient’s safety is the predominant concern in a criminal, civil or administrative proceeding;

• The disclosure to the patient is prohibited by the Clinical Laboratory Improvement Act (42 U.S.C. §263a);

• You are a correctional institution inmate and the correctional administrators have provided reasons for denying access;

• The information is included exclusively in a research study not yet complete;

• The Privacy Act (5 U.S.C. §552a) prohibits access;

• The information was obtained by a person other than a health care provider upon our promise to keep the information confidential, and would reveal the informant’s identity;

• We determine access is likely to endanger the life or safety of the patient or others;

• The information contains information about another person and we determine that access is likely to cause substantial harm to that person;

• The request for access is made by the patient’s personal representative and we believe access is likely to cause substantial harm to the patient or others;

• If you are denied access to your PHI, in some cases you will have the right to request a review of this denial. The review will be performed by a licensed health care professional designated by us, who did not participate in the original decision to deny access. 2. The Right to Request Restrictions:

You have the right to request a restriction on the way we use or disclose your PHI for treatment, payment, and health care operations. You also have the right to request restrictions on the PHI that we disclose about you to a family member, friend or other person involved in your care or the payment of your care. If you wish to request such a restriction, you should submit your written request to us. You must tell us what information you want restricted, to whom you want the restriction applied, and whether you want to limit our use, disclosure or both.

We are not required to agree to such a restriction. If we do agree to the restriction, we will abide by it as long as you agree to maintain the restriction except as needed to provide you with emergency treatment.

3. The 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. You should submit your written request for confidential communications to us. You must tell us how and where you want your PHI to be communicated. We will accommodate your reasonable requests, but may deny the request if you are unable to provide us with appropriate methods of contacting you.

4. The Right to Request an Amendment:

You have the right to request that we amend medical or billing records, or other PHI maintained by us, for as long as the information is kept by us. Your request must be made in writing and submitted to us within 60 days of being notified of the adverse action. We may deny your request for amendment if the information:

• was not created by us (unless you prove the creator of the information is no longer available to amend the record);

• is not part of the records maintained by us;

• is to the extent that you have already agreed to the disclosure;

• is information to which you do not have a right of access.

We must respond to your request within 60 days of receiving the request. If we agree to the amendment, we will notify you and amend the relevant portions of your medical record. We will also make a reasonable effort to inform business associates and other individuals known to us, or identified by you, as having the PHI being amended.

If we deny your request for amendment, we will give you a written notice of denial, including the reasons for the denial and explain to you how you may have the information reviewed and, if necessary, inserted into the medical record.

We may deny your request for an amendment, you have the right to pursue a complaint process by contacting our Privacy Contact Officer, or you may contact the Secretary of Health and Human Services to lodge your complaint.

5. The Right to An Accounting of Disclosures:

You have the right to request an accounting of certain disclosures of your PHI made after September 15, 2005. You may request an accounting of disclosures made up to six (6) years before the date of your request, and we will provide you an accounting made after or before September 15, 2005. An accounting is a listing of disclosures made by us or by others on our behalf, but does not include disclosures made for treatment, payment and health care operations; disclosures made directly to you, that you authorized, or those which are made to individuals involved in your care; disclosures made to correctional institutions or law enforcement officials when required by law; disclosures made for national security or intelligence purposes; disclosures made to law enforcement officials when required by us; or an incidental disclosure.

You must submit your request for an accounting of disclosures to us in writing. You must state the time period for which you would like the accounting. We will respond to you 60 days after the date of your request, unless we determine that the time period is so long as to make it impractical for you to complete the accounting within that time period. If we fail to respond to your request for an accounting of disclosures made more than once within a 12-month period, we will charge you a reasonable fee for the accounting. The first accounting, within a 12-month period, is provided to you free of charge.

6. The Right to a Paper Copy of This Notice:

You have the right to obtain a paper copy of this Notice, even if you have agreed to receive the Notice electronically. You may request a copy of this Notice at any time by contacting our office in writing or by phone.

7. SPECIAL PURPOSES: PROTECTING THE DISCLOSURE OF MENTAL HEALTH, SUBSTANCE ABUSE, AND HIV-RELATED INFORMATION

For uses and disclosures of your PHI related to care for mental health conditions, substance abuse, or HIV-related information, special restrictions may apply. For example, we generally may not disclose this specially protected information in response to a subpoena, warrant or other legal process unless you sign a special authorization or if a court orders the disclosure.

1. Mental Health Information:

If needed for your diagnosis or treatment in a mental health program, mental health information may be disclosed as needed by those between your treatment team members and, very limited information may be disclosed for payment purposes. Otherwise mental health information may not be disclosed without your authorization, except as specifically permitted by state or federal law.

2. HIV-Related Information:

HIV-related information will not be disclosed, except under limited circumstances set forth under state or federal law, without your specific written authorization.

3. Substance Abuse Treatment:

If you are treated in a substance abuse program, information which could identify you as alcohol or drug-dependant will not be disclosed without your specific authorization except for purposes of treatment or payment, or when specifically required or allowed under state or federal law.

4. Psychotherapy Notes:

A special statement may be included for the disclosure of psychotherapy notes, and special rules may apply which limit the information which is disclosed.

5. Access to Minimum Set:

If you believe that your privacy rights have been violated, you may file a complaint in writing with us or with the federal government.

1. To request additional information, to request that we respond to your request to file a complaint, you should contact the Privacy Contact Officer listed on page one. File a written complaint to:

Privacy Officer
Eye Disease Consultants, LLC
1355 Summit Avenue Suite 522
Hartford, CT 06106

2. To file a complaint with the federal government, you may contact:

Office of Civil Rights
U.S. Department of Health and Human Services
500 Independence Avenue, S.W., Room 509F
HHB Building
Washington, D.C. 20201

3. You will not be retaliated against for filing a complaint.