

VALLEY WOMEN'S HEALTHCARE, INC PS

**NOTICE OF PRIVACY PRACTICES
POLICY**

PURPOSE:

It is the policy of our practice that all physicians and staff preserve the integrity and the confidentiality of protected health information (PHI) pertaining to our patients. The purpose of this policy is to ensure that our practice and its physicians and staff have the necessary medical and PHI to provide the highest quality medical care while protecting the confidentiality of the PHI of our patients to the highest degree possible. Patients should not be afraid to provide information to our practice, its physicians and staff for purposes of treatment, payment and healthcare operations (TPO).

SCOPE: All physicians and staff of our practice must adhere to this policy. Our practice will not tolerate violations of this policy. Violation of this policy is grounds for disciplinary action, up to and including termination of employment and criminal or professional sanctions in accordance with our practice's personnel rules and regulations.

POLICY:

Our practice may change this privacy policy in the future. Any changes will be effective upon the release of a revised privacy policy and will be made available to patients upon request.

1. Reasonable effort shall be made to provide patients or their legally authorized representative the current Notice of Privacy Practices (NPP) on the date of the first service delivery on or after the April 14, 2003, compliance date. An exception exists where the first service delivery involves emergency medical treatment; in such cases, the NPP shall be provided as soon as it is reasonably practicable to do so.
2. Except in emergencies, reasonable effort shall be made to obtain a signed acknowledgement of receipt of the current NPP from the patient or the legally authorized representative.
3. Document reasonable attempts to provide the current NPP by filing the signed acknowledgement of receipt in the medical record. Refusals to sign the acknowledgement, or refusals to accept the NPP, shall also be documented.
4. A current NPP will be posted in a prominent location where it is reasonable to expect that patients will see and have an opportunity to read the document. At any time, a patient or the patient's legally authorized representative may request and receive a copy of the current NPP.
5. The Notice of Information Practices required by Washington State law will be placed in a conspicuous place or provided to the patient in another notice. The Acknowledgement of Receipt of the NPP will contain this required Notice of Information Practices.
6. The NPP shall describe actual privacy practices and examples of all uses and disclosures of PHI. Any change to actual privacy practices shall be reflected in the NPP. Subsequent to any revision, a copy of the "old" NPP shall be retained for 6 years from the date it was last effective.
7. Any person, not only a patient, having questions about the NPP, or privacy/confidentiality practices, shall be directed to the Privacy Officer for further information if necessary.
8. Any member of the general public (who is not a patient or a patient's legally authorized representative) requesting the NPP shall be provided the current NPP as promptly as circumstances permit. The documentation requirements do not apply.

Primary Responsible Party:

Other Responsible Party:

All Staff is knowledgeable and able to direct questions and/or concerns appropriately.

PROCEDURE:

1. Patients or their legally authorized representative must be provided the current Notice of Privacy Practices (NPP) no later than the date of the first service delivery, falling on or after the April 14, 2003, Privacy Rule compliance date.
 - a) Ask the individual to sign the written acknowledgement form attached to the NPP. The signed document shall be filed and maintained in the patient record.
 - b) If the individual refuses the offered NPP or declines to sign the acknowledgement form:
 - Document the refusal on the acknowledgement of receipt form, and
 - File it in the medical record.For example: "Ms. Smith declined to accept NPP" or "Ms. Smith accepted NPP, but refused to sign the acknowledgement form when requested."
 - Sign and date the notation.
2. There is no requirement to provide the current NPP, or attempt to do so, where the first patient encounter involves emergency medical treatment, making the provision of notice and related documentation requirements impractical and/or inappropriate.
 - a) If the patient is an established patient, the documentation in the medical record should corroborate that the patient required and received emergency medical treatment. In such cases, the current NPP (if it has not been given previously) shall be provided as soon as it is reasonably practicable to do so. This may be at the next scheduled appointment, via mail if it appears the patient may not return for another appointment, or by any other means reasonable and appropriate under the specific circumstances.
 - b) When provision of the current NPP at the first service is not accomplished due to the emergency exception, and we have a chart on the patient, written acknowledgement of subsequent provision is required.
3. Copies of the current NPP shall be maintained and available to give to any patient, legally authorized representative, or other person, so requesting.
4. The NPP shall be revised any time there are material changes to the uses and disclosures of PHI, patient rights, provider duties, or other privacy practices referenced in the original NPP.
5. Patients receiving the NPP who have questions or desire further information should be directed to the clinic's Privacy Officer, as necessary. Every effort should be made to help interested patients understand the information contained in the NPP.

Policies and Procedures Specific to Electronic Notices of Privacy Practices:

1. The current NPP will be prominently posted on the Web site and made readily available electronically through our Web site. The clinic Web site is www.valleywomenshealthcare.com.

Policy effective date: 04/14/03 Revision date(s): ___/___/___