

NOTICE OF POLICY PRACTICES OF FOOT AND ANKLE SPECIALISTS OF OHIO

THIS NOTICE DESCRIBES HOW MEDICAL INFORMATION ABOUT YOU MAY BE USED AND HOW YOU CAN GET ACCESS TO THIS INFORMATION. PLEASE READ CAREFULLY.

Foot And Ankle Specialists of Ohio will ask you to sign an acknowledgment that you have received this Notice of Privacy Practice ("Notice"). This notice described, in accordance with the HIPAA Privacy regulation, how Foot and Ankle Specialists of Ohio (LCFAA) may use and disclose your protected health information to carry out treatment, payment or health care operations and for other specific purposes that are permitted or required by law. The Notice also describes your rights and LCFAA's duties with respect to protected health information about you.

USE AND DISCLOSURES OF YOUR PERSONAL INFORMATION

Your Authorization - Except in cases outlined below, LCFAA will not use or disclose your personal health information for any purpose unless you have signed a form authorizing the use or disclosure. You have the right to revoke that authorization in writing unless LCFAA has action in compliance with this authorization.

Uses and Disclosures for Treatment - LCFAA will make uses and disclosures of your personal health information as necessary for your treatment, LCFAA may also release your personal health information to another health care facility or professional who is not affiliated with the practice, but who is or will be providing treatment to you. Examples of this may include releasing your personal health information to another physician's practice that will be involved with your treatment.

Uses and Disclosures for Payment - LCFAA will make uses and disclosures of your personal health information as necessary for payment purposes of those health professionals and facilities that have treated you or provided services to you. An example of this may include forwarding information regarding your medical treatment to your insurance company to arrange payment for the services provided to you.

Family and Friends Involved in Your Care - With your permission, LCFAA may disclose your personal health information to designated family, friends and others who are involved with your care or in the payment of your care in order to facilitate that person's involvement in care for you or paying for your care. If you are unavailable, incapacitated or facing an emergency medical situation and it is determined that a limited disclosure of your health information may be in your best interest, limited personal health information may be shared with such individuals without your approval.

Business Associates - LCFAA maintains contracts with outside persons and organizations such as professional answering services, medical transcriptionists, collection agencies and legal services. In certain cases, it may be necessary to provide certain personal health information to one or more of these outside persons or organizations to assist with LCFAA health care operations. In each of these cases, business associates are required by contract to safeguard the privacy of your personal health information.

Appointment and Services - LCFAA may contact you to provide reminders or test results. You have the right to request and LCFAA will accommodate reasonable requests by you to receive communications regarding your personal health information from us by alternate means or locations. An example of this may include not leaving appointment reminders on an answering machine or voice mail at home or at work. You may request such communication in writing or at a specific phone number or address.

Confidentiality of Alcohol and Drug Abuse Patient Records - The confidentiality of alcohol and drug abuse patient records maintained by LCFAA is protected by federal law and regulations. Generally LCFAA may not disclose any information identifying you as an alcohol or drug abuser unless you consent in writing, the disclosure is allowed by a court order or the disclosure is made to medical personnel in a medical emergency or to qualified personnel for research, audit or program evaluation.

Other Uses and Disclosures - Federal law and regulations do not protect any information about a crime committed by you either at LCFAA or against any person that works for or with this practice or about any threat to commit such a crime. Federal laws and regulations do not protect any information about suspected child or elder abuse or neglect under State Law to appropriate state or local authorities. LCFAA is required by law to make certain other uses and disclosure of your personal health information without your consent or authorization.

NOTICE OF PRIVACY PRACTICES OF LCFAA

- For any purpose required by law
- For public health activities, such as required reporting of disease or injury or both and death and for required public health investigations.
- To your employer when LCFAA has provided treatment to you at the request of your employer to determine workplace related injuries.
- To worker's compensation agencies if necessary for your worker's compensation benefit determination.
- To the Food and Drug Administration if necessary to report adverse events, product defects or to participate in product recalls;
- To a government oversight agency conducting audits, investigations or civil or criminal proceedings.
- If required by court or administrative ordered subpoena or discovery requests (in certain cases you will have notice of such released information).
- To law enforcement officials as required by law to report wounds and injuries and crimes.
- If necessary to arrange for organ or tissue donation from you or a transplant for you.
- In limited circumstances if we suspect a serious threat to health and safety.
- For suspected child abuse or neglect or if there is suspicion that you may be a victim of abuse, neglect, or domestic violence.
- If you are a member of the military as required by armed forces services or if necessary for national security or intelligence activities.

RIGHTS THAT YOU HAVE:

Access to your Personal Health Information - You have the right to copy and/or inspect much of the personal health information that LCFAA retains on your behalf. All requests for access must be made in writing and signed by you or your representative.

Amendments to your Personal Health Information - You have the right to request in writing that personal health information that LCFAA maintains be amended or corrected. LCFAA is not obligated to make all requested amendments but will give each request careful consideration. All amendment requests must be in writing, signed by you or your representative and must state the reasons for the amendment/corrections request. All subsequent amendments will be forwarded to all those parties involved with your treatment that may not have the uncorrected information.

Accounting for Disclosures of Your Personal Health Information - You have the right to receive an accounting of certain disclosures by LCFAA of your personal health information after April 14, 2003. Requests must be made in writing and signed by you or your representative. The first accounting in any one-year period is without charge and then a charge of \$20 for each subsequent accounting in a one-year period will be enforced.

Restrictions on Use and Disclosure of Your Personal Health Information - You have the right to request restrictions on certain uses and disclosures of your personal health information by LCFAA for treatment, payment or health care operations. This may be made in writing to LCFAA. LCFAA is not required to agree with your restriction, but will attempt to accommodate reasonable request when appropriate.

Complaints - If you believe your privacy rights have been violated, you can file a complaint with any staff member or the office manager. You may also file a complaint with the Secretary of the U.S. Department of Health and Human Services in Washington, DC in writing within 180 days of a violation of your rights. There will be no retaliation for filing a complaint.

Acknowledgment of Receipt of Notice - You will be asked to sign an acknowledgment form that you received this Notice of Privacy.

EFFECTIVE DATE - THIS NOTICE OF PRIVACY PRACTICES IS EFFECTIVE AS OF APRIL 14, 2003.