



NOTICE OF PRIVACY PRACTICES

This Notice of Privacy Practices describes how information about you may be used and disclosed, and how patients can access their records and information about the services provided to them. Please review this document carefully.

Gateway Community Services, Inc. (*Gateway*) is required by law to protect the privacy of patient health information (PHI), and to provide patients with a copy of this notice, which describes Gateway's, and any affiliated health care providers, privacy practices. Patients are able to obtain a copy of this document at any time by contacting Gateway at (904) 387-4661 or by asking for one while at one of Gateway's service sites.

Understanding patient health records and information

Each time that a patient visits Gateway, the visit, and the services provided, are documented in Gateway's electronic health record (EHR). Typically, this record contains assessment, treatment plan(s), progress notes, discharge summary, consent forms, and other patient-related data. This information, serves as a:

- Basis for planning services and treatment
- Means of communication among the professionals who contribute to each patient's care
- Legal document describing the care provided/received
- Means for verification that the services billed Gateway were actually provided
- An educational tool
- A source of research data
- A source of information for public health officials charged with improving the health of the city, county, state, and/or nation
- A source of data for planning and marketing, *and*
- A tool that allows Gateway to access and continually work to improve services and operations

Understanding what is in the patient record and how health information is used helps you to:

- Ensure its accuracy
- Better understand who, what, when, where, how, and why, others may access patient information
- Make informed decisions when allowing others to access to your record

Requirements for Acknowledgement of Notice of Privacy Practices

Gateway requires that each patient sign a form documenting that they have received this Notice of Privacy Practices.

Requirements for Written Authorizations

Written permission must be obtained from a patient before any information can be shared with anyone outside of the organization. Patients may request that all, or portions of, their record be sent to another person by completing an Gateway authorization to release information (ROI) form. Gateway employees can provide this form and assist with its completion.

Permission to disclose/release information that is granted by a patient may be revoked at any time, except to the extent that Gateway has already acted upon the initially granted permission. Any patient wishing to revoke an authorization, should immediately contact Gateway's Records Department. (904-387-4661, ext. 1220)

Exception to Requirement

There are occasions when Gateway does not need a patient's written authorization before using or sharing your health information with others. These situations include:

Exception for Treatment, Payment, and Business Operations: Gateway is allowed to use and disclose patient health information without a patient's consent to provide treatment, collect payment, and to manage normal business operations.

Exception to Business Associates: There are some Gateway services that are provided through contacts with qualified business associates. Whenever services are contracted, Gateway may disclose your information to our business associate so that they can provide the specified service and bill for services. Gateway requires that the business associate appropriately safeguard your information in order to protect your privacy and the business associate may not redisclose any patient information.

Exception for Product Monitoring, Repair, and Recall: Gateway may disclose to the Food and Drug Administration (FDA) information relative to adverse events with respect to food, supplements, product and product defects, or post-marketing surveillance information to enable product recalls, repairs or replacement.

Exception for Law Enforcement: Gateway may disclose your health information to law enforcement officials for the following reasons:

- To comply with a court order
- If necessary to report a crime that occurred on Gateway property

Exception for Lawsuits and Legal Disputes: Gateway may disclose patient health information if the organization, and/or its employee(s), are required to do so by a court order.

Exception for Child Abuse and Neglect Reporting: Gateway is required by law to report *suspected* cases of child abuse and/or neglect. Gateway will make every effort to obtain patient permission before releasing this information, but in some cases, Gateway may be required or authorized to act without the patient's permission.

Exception for Health Oversight Activities: Gateway may release patient health information to government agencies authorized to conduct audits, investigations, and inspections of its facilities and/or services. These government agencies monitor healthcare system operations, government benefits, and compliance with regulatory programs and civil rights laws.

Exception for Medical Emergencies: Gateway may release patient information to public or private medical personnel to the extent necessary to effectively respond to a medical emergency. A medical emergency is defined as any "*situation that poses an immediate threat to the individual's health and requires immediate medical intervention*".

Exception for Research: Gateway may release information to researchers when their research has been approved by an Institutional Review Board that has reviewed the research proposal and established protocols to ensure the privacy of patient health information.

Exception If Information Does Not Identify a Patient: Gateway may use or release patient health information if Gateway has removed any information that might reveal a patient's identity.

Other Uses or Disclosures

Federal Law allows patient information to be released to an appropriate health oversight agency, or a public health authority or attorney, provided that a Gateway staff member, or business associate, believes, in good faith, that Gateway has engaged in unlawful conduct or has otherwise violated ethical standards and/or are possibly endangering one or more patients, employees, and/or the public.

Right of Patients to Access and/or Correct Their Own Information

Patients have the right to inspect and obtain a copy of their health information. This includes health and billing records. Requests to inspect, or to obtain, patient information, should be submitted to Gateway's Records Department. Patients also have the right to request, that Gateway correct your information if you believe it is inaccurate or incomplete.

Right of Patients to Track the Sharing of Health Information

You have the right to receive a list from Gateway, called an "Accounting of Disclosures", that provides information about when and how Gateway released your information to outside persons and organizations and will specify what information was disclosed.

Right of Patients to Request Additional Privacy Protections

Patients have the right to request further restrictions on the way Gateway uses their health information and/or how it is shared with others. Requests for restrictions, should be presented in writing to Gateway's Records Department. Requests should specify: (1) What information to limit, (2) The limitations to be placed on Gateway's use of the information, and/or how Gateway can share the information with others; *and* (3) to whom the additional limits should be applied. Gateway may not be required to agree to the requested additional restriction(s), and in some cases, the requested additional restriction may not be permitted under law. Patients requesting additional restrictions will be informed of the outcome of consideration of their request in writing.

Right to Request Confidential Communications

Patients have the right to request that Gateway contact them in a more confidential manner, such as at home instead of at work. Gateway will try to accommodate all requests.

Right to Request Someone to Act on Your Behalf

Patients have the right to name a personal representative who may act on their behalf to control the privacy of their information.

Gateway Responsibilities: Gateway is required to:

- Maintain the privacy of patient health information
- Provide patients with a notice describing the organization's legal duties and privacy practices
- Abide by the terms of this notice
- Notify you if Gateway are unable to agree to a requested restriction
- Accommodate reasonable requests that patients may have to communicate information by alternative means and/or at alternative locations

Gateway reserves the right to change organization privacy practices at any time. Changes to organizational privacy practices will be posted in a conspicuous location at all Gateway sites, and will specify the effective date of the revision. A copy of this notice may be obtained at any time by calling Gateway's Records Department (904-387-4661, ext. 1220) or asking for a copy.

For More Information or to Report a Problem

Patients who have questions and would like additional information, may contact Gateway's Records Department at 904-387-4661, ext. 1220. Any patient who believes that their privacy rights might have been violated, can file a complaint with Gateway's Privacy Officer or with the Department of Health and Human Services. No consequences will result for complaints filed in good faith.

- Gateway's Privacy Officer: 904-387-4661, extension #1221 **or** HippaDataMonitor@gwjax.com
- HHS Complaints: 1-800-368-1019, TDD: 1-800-537-7697, OCRMail@hhs.gov
<https://ocrportal.hhs.gov/ocr/smartscreen/main.jsf>