



Notice of Privacy Practices

Your Information. Your Rights. Our Responsibilities.

This notice describes how Protected Health Information (**PHI**) about you may be used and disclosed and how you can get access to this information. **Please review it carefully.** *These privacy rights apply if you are 18 years old or older or if you are an “emancipated minor.” If you are younger than 18, this information will be reviewed with you and your parent(s)/legal guardian who has the right to act on these privacy rights on your behalf.*

Your Rights

You have the right to:

- Get a copy of your health records
- Correct your health records
- Request confidential communication
- Ask us to limit the information we share
- Get a list of those with whom we’ve shared your information
- Get a copy of this privacy notice
- Choose someone to act for you
- File a complaint if you believe your privacy rights have been violated
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Your Choices

You have some choices in the way that we use and share information as we:

- Answer treatment questions from your family and friends
- Provide disaster relief
- Market our services and sell your information

Our Uses and Disclosures

We may use and share your information as we:

- Help manage the health care treatment you receive
- Run our organization
- Receive payment for your health services
- Help with public health and safety issues
- Do research
- Comply with the law
- Respond to organ and tissue donation requests and work with a medical examiner or funeral director
- Address workers’ compensation, law enforcement, and other government requests
- Respond to lawsuits and legal actions

Your Rights

When it comes to your health information, you have certain rights. This section explains your rights and some of our responsibilities to help you.

Get a copy of health records

- You can ask to see or get a copy of your health information we have about you. Ask us how to do this.
- We will provide a copy or a summary of your health records, usually within 30 days of your request. We may charge a reasonable, cost-based fee.

Ask us to correct health records

- You can ask us to correct your health records if you think they are incorrect or incomplete. Ask us how to do this.
- We may say “no” to your request, but we’ll tell you why in writing within 60 days.

Request confidential communications

- You can ask us to contact you in a specific way (for example, home or office phone) or to send mail to a different address.
- We will consider all reasonable requests, and must say “yes” if you tell us you would be in danger if we do not.

Ask us to limit what we use or share

- You can ask us not to use or share certain health information for treatment, payment, or our operations.
- We are not required to agree to your request, and we may say “no” if it would affect your care.

Get a list of those with whom we’ve shared information

- You can ask for a list (accounting) of the times we’ve shared your health information for six years prior to the date you ask, who we shared it with, and why.
- We will include all the disclosures except for those about treatment, payment, and health care operations, and certain other disclosures (such as any you asked us to make). We’ll provide one accounting a year for free but will charge a reasonable, cost-based fee if you ask for another one within 12 months.

Get a copy of this privacy notice

You can ask for a paper copy of this notice at any time, even if you have agreed to receive the notice electronically. We will provide you with a paper copy promptly.

Choose someone to act for you

- If you have given someone medical power of attorney or if someone is your legal guardian, that person can exercise your rights and make choices about your health information.
- We will make sure the person has this authority and can act for you before we take any action.

File a complaint if you feel your rights are violated

- You can complain if you feel we have violated your rights by contacting us using the information on page 4.
- You can file a complaint with the U.S. Department of Health and Human Services Office for Civil Rights by sending a letter to 200 Independence Avenue, S.W., Washington, D.C. 20201, calling 1-877-696-6775, or visiting www.hhs.gov/ocr/privacy/hipaa/complaints/.
- We will not retaliate against you for filing a complaint.

Your Choices

For certain health information, you can tell us your choices about what we share. If you have a clear preference for how we share your information in the situations described below, talk to us. Tell us what you want us to do, and we will follow your instructions.

In these cases, you have both the right and choice to tell us to:

- Share information with your family, close friends, or others involved in payment for your care
- Share information in a disaster relief situation

If you are not able to tell us your preference, for example if you are unconscious, we may go ahead and share your information if we believe it is in your best interest. We may also share your information when needed to lessen a serious and imminent threat to health or safety.

In these cases we *never* share your information unless you give us written permission:

- Marketing purposes
- Sale of your information

Other Uses and Disclosures

How do we typically use or share your health information?

We typically use or share your health information in the following ways.

Help manage the treatment you receive

We can use your health information and share it with professionals who are treating you.

Example: A social worker, as a member of the treatment team, sends us information about your diagnosis and treatment plan so we can arrange additional services. We may disclose information to other non-Key “treatment team” members who assist in coordinating and managing your care.

Run our organization

- We can use and disclose your information to run our organization and contact you when necessary.
- We are not allowed to use genetic information to decide whether we will provide treatment services.

Example: We may use your health information to develop better services for you with other provider and state agencies and schools at family and treatment plan meetings.

Pay for your health services

We can use and disclose your health information as for payment of your health services.

Example: We share information about you with the agencies that contract with us to receive payment for the services we provide for you.

How else can we use or share your health information?

We are allowed or required to share your information in other ways – usually in ways that contribute to the public good, such as public health and research. We have to meet many conditions in the law before we can share your information for these purposes. For more information see: www.hhs.gov/ocr/privacy/hipaa/understanding/consumers/index.html.

Help with public health and safety issues

We can share health information about you for certain situations such as:

- Preventing disease
- Helping with product recalls
- Reporting adverse reactions to medications
- Reporting suspected abuse, neglect, or domestic violence
- Preventing or reducing a serious threat to anyone’s health or safety

Do research

We can use or share your information for health research.

Comply with the law

We will share information about you if state or federal laws require it, including with the Department of Health and Human Services if it wants to see that we’re complying with federal privacy law.

Respond to organ and tissue donation requests and work with a medical examiner or funeral director

- We can share health information about you with organ procurement organizations, if applicable.
- We can share health information with a coroner, medical examiner, or funeral director when an individual dies, if applicable.

Address workers' compensation, law enforcement, and other government requests

We can use or share health information about you:

- For workers' compensation claims
- For law enforcement purposes or with a law enforcement official
- With health oversight agencies for activities authorized by law
- For special government functions such as military, national security, and presidential protective services

Respond to lawsuits and legal actions

We can share health information about you in response to a court or administrative order, or in response to a subpoena.

Our Responsibilities

- We are required by law to maintain the privacy and security of your protected health information.
- We will let you know promptly if a breach occurs that may have compromised the privacy or security of your information.
- We must follow the duties and privacy practices described in this notice and give you a copy of it.
- We will not use or share your information other than as described here unless you tell us we can in writing. If you tell us we can, you may change your mind at any time. Let us know in writing if you change your mind.

For more information see: www.hhs.gov/ocr/privacy/hipaa/understanding/consumers/noticepp.html.

Changes to the Terms of this Notice

We can change the terms of this notice, and the changes will apply to all information we have about you. The new notice will be available upon request, on our web site, and we will mail a copy to you. We will post a copy of a current **Notice of Privacy Practices** at our clinics, regional office locations and at each program site where we provide services. You may also ask for a copy at any time you visit one of our offices or program sites.

Other Notice

- We will never share any substance abuse treatment record, information about your HIV/AIDS status, or psychotherapy notes, if applicable, without your written permission.
- We will never disclose the results of a genetic test without first obtaining a written authorization and "informed written consent."

IMPORTANT NOTIFICATION

If you believe your privacy rights have been violated, you may file a complaint with Key or with the Secretary of the U.S. Department of Health and Human Services. To file a complaint with us, you must contact our **Agency Privacy Officer**. Submit all complaints in writing. At your request, Privacy Officer will assist you in writing your complaint. **Agency Privacy Officer, Cynthia Hay, Director of Management/Human Resources in Key's main office. Contact her at Key Program, Inc., 670 Old Connecticut Path, Framingham, MA 01701, telephone number (508) 877-3690, email address chay@key.org.**

Effective Date of this Notice - September 23, 2013
