

## St. Norbert College Health and Wellness Services

### Notice of Privacy Practices

Effective April 14, 2003

**THIS NOTICE DESCRIBES HOW MEDICAL INFORMATION ABOUT YOU MAY BE DISCLOSED AND HOW YOU CAN GET ACCESS TO THIS INFORMATION. PLEASE REVIEW IT CAREFULLY.**

Each time you visit the St. Norbert College Health and Wellness Services (H&WS), an electronic/paper record combination of your visit is made. This record usually contains identification and financial information (Protected Health Information, PHI) including symptoms, diagnosis, medical notes, test results and a treatment plan that is generated for each person accessing care in H&WS.

St. Norbert College Health and Wellness Services uses PHI about you for treatment; to obtain payment for treatment, for administrative purposes, and to evaluate the quality of care that you receive. The PHI that is contained in health records is the physical property of St. Norbert College and it is used:

- To plan for your care and treatment;
- To communicate information among your health care professionals;
- To legally record the care you received;
- To verify to you or your insurance company the services that were provided;
- To assist St. Norbert College Health and Wellness Services evaluate and improve the care provided and the outcomes achieved;
- To provide a source of information for important health related research;
- To educate health professionals and students;
- To provide a source of information for planning and marketing Health and Wellness Services

The St. Norbert College Health and Wellness Services has worked diligently over the years to protect the health records of all who have received health care here. The Health Insurance Portability and Accountability Act of 1996 (HIPAA) requires H&WS to provide you with this notice describing our legal duties and privacy practices concerning your personal health information. In general, when we use or disclose your PHI, we do so with the least amount of information necessary to achieve the purpose. This is called the Least Necessary Rule. This rule does not apply if the disclosure is to your health care provider regarding your treatment, to you, or due to a legal requirement.

We reserve the right to change the privacy practices described in this notice, in accordance with the law. Changes to our privacy practices would apply to all PHI maintained by Health and Wellness Services. If changes would occur, they may be reviewed on the SNC web site [www.snc.edu/health/](http://www.snc.edu/health/) You may obtain a copy of the changes by sending your request in writing to the senior director for Health and Wellness Services.

#### **How St. Norbert College Health and Wellness Services May Use or Disclose Your Health Information without your written authorization.**

**For Treatment:** St. Norbert College Health and Wellness Services may use your health information to provide you with medical treatment or services. For example, information obtained by a health care provider, such as a nurse, nurse practitioner, therapist or other person providing health services to you, will record information in your record that is related to your treatment. This information is necessary for health care providers to determine what treatment you should receive. Health care providers will also record actions taken by them in the course of your treatment and note how you respond to the actions.

***For Payment:*** St. Norbert College Health and Wellness Services may use and disclose your health information to others for purposes of receiving payment for treatment and services that you receive. For example, a bill may be sent to you or a third-party payor, such as an insurance company or health plan. The information on the bill may contain information that identifies you, your diagnosis, and treatment or supplies used in the course of treatment.

***For Health Care Operations:*** St. Norbert College Health and Wellness Services may use and disclose health information about you for operational purposes. For example, your health information may be disclosed to members of the health care staff, risk or management personnel and others to:

- **Evaluate the performance of our staff;**
- **Assess the quality of care and outcomes in your case and similar cases;**
- **Learn how to improve our facilities and services; and**
- **Determine how to continually improve the quality and effectiveness of the health care provided.**

***Appointments:*** St. Norbert College Health and Wellness Services may use your information to provide appointment reminders or information about treatment alternatives or other health-related benefits and services that may be of interest to the individual.

***Legal Purposes:*** St. Norbert College Health and Wellness Services may use and disclose information about you as required by law. For example, St. Norbert College Health and Wellness Services may disclose information for the following purposes:

- **For judicial and administrative proceedings pursuant to legal authority;**
- **To report information related to victims of abuse, neglect or domestic violence; and**
- **To assist law enforcement officials in their law enforcement duties;**

***Public Health:*** St. Norbert College Health and Wellness Services may use and disclose your health information for public health activities such as assisting public health authorities or other legal authorities to prevent or control disease, injury, or disability, or for other health oversight activities.

***Health Oversight Activities:*** St. Norbert College Health and Wellness Services may use and disclose your health information to assist health agencies during the course of audits, investigations, inspections, licensure and other proceedings related to oversight of health care systems and government benefit programs.

***For activities related to death:*** St. Norbert Health and Wellness Services may use and disclose your health information to funeral directors or coroners to enable them to carry out their lawful duties, such as identification of a body, determining cause of death or to carry out funeral preparation activities.

***Organ/Tissue Donation:*** St. Norbert College Health and Wellness Services may use and disclose your health information for cadaveric organ, eye or tissue donation purposes.

***Health and Safety:*** St. Norbert College Health and Wellness Services may use and disclose your health information to avert a serious threat to the health or safety of you or the public's health and safety.

***Government Functions:*** St. Norbert College Health and Wellness Services may use and disclose your health information if you are involved with the military, national security or intelligence activities, or you are in the custody of law enforcement officials or an inmate in a correctional institution, so that these agencies may carry out their duties under the law.

***Worker's Compensation:*** St. Norbert College Health and Wellness Services may use and disclose your health information in order to comply with laws and regulations related to workers compensation and other similar programs.

## **Your Health Information Rights**

You have several rights with regard to your health information. If you wish to exercise any of the following rights, please contact the Health and Wellness Services director. Specifically you have the right to:

***Inspect and copy your health information:*** You have the right to inspect and obtain a copy of your health information. The inspection of PHI will occur in the presence of a health care provider or therapist on staff at St. Norbert College Health and Wellness Services. This right does not apply to psychotherapy notes or information gathered for judicial proceedings. In addition, St. Norbert College Health and Wellness Services may charge you a reasonable fee for a copy of your health information.

***Request to correct your health information:*** If you believe your PHI is incorrect, you may ask St. Norbert College Health and Wellness Services Director to correct the information. You will be asked to make such requests in writing and to give a reason as to why your health information should be changed. However, if St. Norbert College health care or counseling staff did not create the health information that you believe is incorrect, or if we disagree with you and believe your health information is correct, we may deny your request.

***Request restrictions on certain uses and disclosure:*** You have the right to ask for restrictions on how your PHI is used or to whom your information is disclosed, even if the restriction affects your treatment or our payment or health care operation activities. You may want to restrict the health information provided to family or friends involved in your care or payment of medical bills, or to restrict the health information provided to authorities involved in disaster relief efforts. If you received certain medical devices, you may refuse to release your name, address, telephone number, and social security number or other identifying information used for tracking the medical device. However, even though St. Norbert College Health and Wellness Services is not legally required to agree to such restrictions, we will consider your request in accordance with all other responsibilities of Health and Wellness Services

***Receive confidential communication of health information:*** You have the right to request alternate means or locations where we may communicate your health information to you. For example, you may wish to receive information about your health status in a special, private room or through a written letter sent to a private address. St. Norbert College Health and Wellness Services will accommodate most reasonable requests.

***Receive a record of disclosures of your health information:*** In some limited instances, you have the right to request a report of the disclosures of your PHI that St. Norbert College Health and Wellness Services have made during the previous six years, but the request cannot include dates before April 14, 2003. This written report must include the date of each disclosure, who received the disclosed PHI, and a brief description of the disclosed information, and why it was disclosed.

***Receive a paper copy of this notice of information practices upon request:*** Upon your written request, you may at any time obtain a copy of this notice. This notice is available online at [www.snc.edu/health](http://www.snc.edu/health) and is available for print. A copy can also be obtained at St. Norbert College Health and Wellness Services

***File a complaint:*** If you believe your privacy rights have been violated, you may submit a letter of concern to the senior director for St. Norbert College Health & Wellness and/or the vice president of Mission & Student Affairs. You will not be retaliated against for filing a complaint. There is more information available at [http://www.hhs.gov/ocr/privacy/hipaa/faq/right\\_to\\_file\\_a\\_complaint/352.html](http://www.hhs.gov/ocr/privacy/hipaa/faq/right_to_file_a_complaint/352.html)

## **Obligations of St. Norbert College Health and Wellness Services**

St. Norbert College Health and Wellness Services is required to:

- Maintain the privacy of PHI in accordance with HIPAA 45 CFR 164.501;
- Require a Business Associate Agreement from any business or agency that does business with St. Norbert College Health and Wellness Services to assure complete health care management, record management, and insurance payment with regard to PHI.
- Assure that Business Associate that has electronic transactions with Covered Entity's Client Data meet the regulatory standards of the American Recovery and Reinvestment Act of 2009, specifically, the Health Information Technology for Economic and Clinical Health (HITECH) regulations.
- Assure that Electronic Medical Records Systems are certified by the Certification Commission for Healthcare Information Technology (CCHIT).
- Provide individual with this notice of its legal duties and privacy practices with respect to individual's PHI;
- Abide by the terms of this notice;
- Notify individual in writing if H&WS are unable to agree to a requested restriction on how individual's information is used or disclosed;
- Accommodate reasonable requests individual may make to communicate health information by alternative means or alternative locations;
- Obtain individual's written authorization to use or disclose your health information for reasons other than those listed above and permitted by law.

St. Norbert College Health and Wellness Services reserves the right to change its privacy information practices and to make the new provisions effective for all PHI it maintains. Revised notices will be made available to you at the front desk when health care is accessed after the revisions take effect or on Health and Wellness Services website at [www.snc.edu/health](http://www.snc.edu/health).

HIPAA Privacy Notice  
June, 2014