

**PORTICO HEALTHNET
NOTICE OF PRIVACY PRACTICES**

***THIS NOTICE DESCRIBES HOW MEDICAL INFORMATION ABOUT YOU MAY BE
USED AND SHARED AND HOW YOU CAN GET ACCESS TO THIS INFORMATION.***

PLEASE REVIEW IT CAREFULLY.

If you have any questions or wish to receive additional information about the matters covered by this Notice of Privacy Practices, please contact Privacy Officer Christopher Bargeron at 651.603.5115.

Portico Healthnet ("Portico") is required to abide by the terms of this Notice of Privacy Practices ("Notice"). Portico may change the terms of this Notice at any time. The revised Notice will apply to all protected health information ("PHI") Portico received or created in the past, as well as all PHI Portico receives or creates in the future. A current copy of the Notice will be posted in the reception area of Portico's office. The effective date of this Notice is April 14, 2004. If this notice changes, Portico will mail you a new copy. You may also obtain a copy of the current Notice by calling Portico's Privacy Officer, Christopher Bargeron, at 651.603.5115.

Your "protected health information", or PHI, consists of all individually identifiable information which is created or received by Portico and which relates to your past, present or future physical or mental health condition, the provision of health care to you or the past, present or future payment for health care provided to you.

**SECTION I
USE AND DISCLOSURE OF PHI FOR WHICH YOUR
CONSENT OR AUTHORIZATION IS NOT REQUIRED**

1. Treatment. Portico will use and share your PHI to coordinate your health care and related services by Portico and other health care providers. For example, Portico will share your PHI with a health care provider to whom you have been referred to ensure that the health care provider has the necessary information he or she needs to diagnose and/or treat you.

2. Payment. Portico will use and share your PHI, as needed, to provide payment for the health care Portico coordinates for you. For example, Portico will share PHI with your primary care clinic so that the primary care clinic can bill Portico for the services that you will receive.

3. Health Care Activities. Portico may use or share your PHI in order to support the business activities of Portico, including, but not limited to, quality assessment and improvement activities, business planning and development, and business management and general administrative activities. For example, Portico may use your PHI to develop reports for program funders.

4. **Abuse, Neglect or Domestic Violence.** Portico may share your PHI with a government authority authorized to receive reports of abuse, neglect or domestic violence if Portico believes that you are a victim or perpetrator of abuse, neglect or domestic violence.

5. **Medical Research.** Portico may share your PHI for research purposes, in accordance with applicable laws.

6. **Serious Threat to Health or Safety.** Portico may share your PHI if the disclosure is necessary to prevent or lessen a serious threat to health or safety or the information is necessary to stop an individual.

7. **Other Uses and Disclosures.** Portico may also use or share your PHI for the following reasons:

- Fundraising Activities
- To a Public Health Authority For Public Health Purposes
- Appointment Reminders
- Treatment Alternatives
- Health Related Benefits and Services
- Workers' Compensation
- Health Oversight Activities
- Judicial and Administrative Proceedings
- Law Enforcement Purposes

Any use or disclosure of your PHI that is not listed in this section will be made only with your written authorization. You have the right to cancel your authorization at any time, except if Portico has already used or disclosed your PHI in reliance on the authorization.

SECTION II YOUR RIGHTS REGARDING YOUR PHI

1. **Restriction of Use and Disclosure.** You may ask Portico to restrict the PHI Portico uses and shares in carrying out treatment, payment and health care operations. You may also restrict the PHI Portico shares with a family member, other relative or any other person identified by you, which is relevant to that person's involvement in your treatment or payment for your treatment. **Portico is not obligated to agree to any restriction that you request.** If Portico agrees to a restriction, however, Portico may only disclose your PHI in accordance with that restriction, unless the information is needed to provide emergency health care to you.

If you want to ask for a restriction on the use and disclosure of your PHI, send a written request to the Privacy Officer which specifically states (1) whether you are restricting the use or the disclosure of your PHI, (2) what PHI you wish to limit, and (3) to whom you wish the limits to apply (i.e., your spouse). Portico will not ask why you are requesting the restriction. The Privacy Officer will review your request and notify you whether or not Portico will agree to your request.

2. Confidential Communications. You may ask to receive communications of your PHI from Portico in different forms or at different places. Portico will accommodate all reasonable requests. To ask that Portico communicate your PHI in different forms or at different places, send a written request to the Privacy Officer explaining the different way or place you wish to receive such communications. Portico will not ask why you are making such a request. When appropriate, Portico may charge a fee for costs involved with your request.

3. Access to PHI. You may inspect and obtain a copy of your PHI that Portico maintains in a designated record set, for as long as that PHI is maintained in a designated record set. A "designated record set" is a group of records maintained by or for Portico which includes billing records and records used to make decisions about you. You do not have the right to information compiled in reasonable anticipation of, or for use in, a civil, criminal or administrative action or proceeding, or information that Portico is otherwise prohibited by law from disclosing.

If you want to inspect or obtain a copy of your PHI, send a written request to the Privacy Officer. If you request a copy of your PHI, Portico may charge a fee for the cost of copying and mailing the information.

Portico may, for certain limited reasons, deny your request to inspect or obtain a copy of your PHI. If Portico denies your request, you may be entitled to a review of that denial. If you are entitled to a review and you wish to have Portico's decision reviewed, contact the Privacy Officer. The Privacy Officer will designate a licensed health care professional to review your request. This reviewing health care professional will not have participated in the original decision to deny your request. Portico will comply with the decision of the reviewing health care professional.

4. Amending PHI. You may ask that Portico amend, or change, your PHI in a designated record set for as long as that information exists in a Designated Record Set. To ask that an amendment be made to your PHI, send a written request to the Privacy Officer. Your written request must explain the reason for the requested amendment.

Portico may deny your request if it does not contain a reason for the requested amendment. Additionally, Portico may deny your request to have your PHI amended if Portico determines that (1) the information was not created by Portico, unless the person or entity that created the information is no longer available to make the amendment; (2) the information is not part of a designated record set; (3) the information is not available for your inspection; or (4) the information is accurate and complete.

5. Accounting of Disclosures of Your PHI. You may ask for a list of certain PHI that was shared by Portico during the last six (6) years. This "list" is called an "accounting." Any accounting you request will not include (1) disclosures made to carry out treatment, payment or health care operations; (2) disclosures made to you; (3) disclosures made as a result of an authorization given by you; (4) disclosures made to other people involved in your care or made for notification purposes; (5) disclosures made for national security or intelligence purposes; (6) disclosures made to correctional institutions or law enforcement officials; or (7) disclosures made prior to April 14, 2004. The right to receive

an accounting may depend on certain other exceptions, restrictions and limitations set forth by applicable law.

To request an accounting of the disclosures of your PHI made by Portico, send a written request to the Privacy Officer. Your written request must state how you want to receive the list of shared information (i.e., hard copy, electronically) and the time period for which you wish to receive the information. Portico will provide one free accounting during each twelve (12) month period. If you make additional requests during the same twelve (12) month period, you will be charged for all costs Portico incurs in preparing and providing you with the information. Portico will inform you of the fee for each request in advance and will allow you to change or withdraw your request in order to reduce or avoid the fee.

6. Obtaining a Copy of this Notice. You have the right to request and receive a paper copy of this Notice of Privacy Practices from Portico at any time.

SECTION III COMPLAINTS

If you believe that your privacy rights have been violated, you may file a complaint with Portico or with the Secretary of Health and Human Services. All complaints must be submitted in writing. PORTICO WILL NOT RETALIATE AGAINST YOU FOR FILING A COMPLAINT. To file a complaint with the Secretary of Health and Human Services, contact:

Office for Civil Rights
U.S. Department of Health and Human Services
222 N. Michigan Ave., Suite 240
Chicago, IL 60601
Phone: 312.866.2359
Fax: 312.866.1807
TDD: 312.353.5693
E-mail: OCRComplaint@hhs.gov

To file a complaint, contact Privacy Officer, Christopher Barger at:

Portico Healthnet
2610 University Avenue
Suite 550
St. Paul, MN 55114
Fax: 651.603.5101
Phone: 651.603.5115

If you have any questions or concerns regarding this notice, contact Privacy Officer Christopher Barger at 651.603.5115.