



ROSE SCHNITZER MANOR
cedar sinai park

Revised 1/28/14

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

A. PURPOSE OF THE NOTICE

Cedar Sinai Park is committed to preserving the privacy and confidentiality of your health information which is created and/or maintained at our facility. State and federal laws and regulations require us to implement policies and procedures to safeguard the privacy of your health information. This Notice will provide you with information regarding our privacy practices and applies to all of your health information created and/or maintained at our facility, including any information that we receive from other health care providers or facilities. The Notice describes the ways in which we may use or disclose your health information and also describes your rights and our obligations concerning such uses or disclosures.

We will abide by the terms of this Notice, including any future revisions that we may make to the Notice as required or authorized by law. We reserve the right to change this Notice and to make the revised or changed Notice effective for health information we already have, as well as any information we receive in the future. We will post a copy of the current Notice, which will identify its effective date, in our facility and on our website at www.cedarsinainpark.org.

The privacy practices described in this Notice will be followed by:

1. Any health care professional authorized to enter information into your medical record created and/or maintained at our facility.
2. All employees, students, and other service providers who have access to your health information at our facility; and
3. Any member of a volunteer group which is allowed to help you while receiving services at our facility.

The individuals identified above will share your health information with each other for purposes of care, payment and operations, as further described in the Notice.

B. USES AND DISCLOSURES OF HEALTH INFORMATION FOR CARE, PAYMENT AND OPERATIONS.

1. **Care, Payment and Operations.** The following section describes different ways that we may use and disclose your health information for purposes of care, payment, and operations. We explain these purposes below and include examples of the types of uses or disclosures that may be made for each purpose. We have not listed every type of use or disclosure, but the ways in which we use or disclose your information will fall under one of these purposes.

- a. **Care.** We may use your health information to provide you with care and services. We may disclose your health information to doctors, nurses, nursing assistants, medication aides, technicians, health profession students, rehabilitation therapy specialists, or other personnel who are involved in your care.

For example, we may contact your physician and recommend that he/she order physical therapy services to improve your strength and walking abilities. We may need to talk with the physical therapist so that we can coordinate services and develop a plan of care. We also may need to refer you to another health care provider to receive certain services. We will share information with that health care provider in order to coordinate your care and services.

- b. **Payment.** We may use or disclose your health information so that we may bill and receive payment from you or your insurance company for the services you receive from us.

You may request that we not disclose your protected health information (PHI) to your health plan when you have paid for the service or item in question out of pocket in full.

- c. **Operations.** We may use or disclose your health information in order to perform the necessary administrative, educational, quality assurance and business functions of our facility.

For example, we may use your health information to evaluate the performance of our staff in caring for you. We may use your health information to evaluate whether certain care or services offered by our facility are effective. We also may disclose your health information to other physicians, nurses, technicians, or health profession students for teaching and learning purposes.

C. USES AND DISCLOSURES OF HEALTH INFORMATION IN SPECIAL SITUATIONS.

We may use or disclose your health information in certain special situations as described below. For these situations, you have the right to limit these uses and disclosures as provided for in Section F.4 of this Notice.

1. **Appointment Reminders.** We may use or disclose your health information for purposes of contacting you to remind you of a health care appointment.
2. **Care Alternatives & Health-Related Products and Services.** We may use or disclose your health information for purposes of discussing with you care alternatives or health-related products or services that may be of interest to you.
3. **Facility Directory.** We may use or disclose certain limited health information about you in our facility directory. This information may include your name, your apartment and phone number. Your name and apartment number, and a general description of your condition may be given to people who ask for you by name.
4. **Family Members and Friends.** We may disclose your health information to individuals, such as family members and friends, who are involved in your care or who help pay for your care. We may make such disclosures when: (a) we have your verbal agreement to do so; (b) we make such disclosures and you do not object; (c) we can infer from the circumstances that you would not object to such disclosures. For example, we will share information about you with your spouse or other family member after giving you an opportunity to agree or object.

We also may disclose your health information to family members or friends in instances when you are unable to agree or object to such disclosures, provided that we feel it is in your best interest to make such disclosures and the disclosures relate to that family member or friend's involvement in your care. For example, if your medical condition prevents you from either agreeing or objecting to disclosures made to your family or friends, we may share information with the family member or friend that comes to visit you at our facility, but we will share only that information which relates to their involvement in your care.

- 5. Fundraising Activities.** We may use or disclose a limited amount of your health information for purposes of contacting you to raise money for our facility and its operations. We also may disclose your health information to a foundation related to our facility so that the foundation may contact you to raise money for our facility. The information we use or disclose will be limited to your name, address, phone number and dates for which you received care or services at our facility.

You may opt out of receiving fundraising communications at any time. If you do not want to receive future fundraising requests supporting Cedar Sinai Park, please call 503.535.4422, identify yourself and state that you do not want to receive fundraising requests. There is no requirement that you agree to accept fundraising communication from us, and we will honor your request not to receive any more fundraising communication from us after the date we receive your decision.

D. OTHER PERMITTED OR REQUIRED USES AND DISCLOSURES OF HEALTH INFORMATION.

There are certain instances in which we may be required or permitted by law to use or disclose your health information without your permission. These instances are as follows:

- 1. As required by law.** We may disclose your health information when required by federal, state, or local law to do so. For example, we are required by the Department of Health and Human Services (HHS) to disclose your health information in order to allow HHS to evaluate whether we are in compliance with the federal privacy regulations.
- 2. Public Health Activities.** We may disclose your health information to public health authorities that are authorized by law to receive and collect health information for the purposes of preventing or controlling disease, injury or disability; to report births, deaths, suspected abuse or neglect, reactions to medications; or to facilitate product recalls.
- 3. Health Oversight Activities.** We may disclose your health information to a health oversight agency that is authorized by law to conduct health oversight activities, including audits, investigations, inspections, or licensure and certification surveys. These activities are necessary for the government to monitor the persons or organizations that provide care to individuals and to ensure compliance with applicable state and federal laws and regulations.
- 4. Judicial or Administrative Proceedings.** We may disclose your health information to courts or administrative agencies charged with the authority to hear and resolve lawsuits or disputes. We may disclose your health information pursuant to a court order, a subpoena, a discovery request, or other lawful process issued by a judge or other person involved in the dispute, but only if efforts have been made to (a) notify you of the request for disclosure or (b) obtain an order protecting your health information.
- 5. Worker's Compensation.** We may disclose your health information to worker's compensation programs when your health condition arises out of a work-related illness or injury.

6. **Law Enforcement Official.** We may disclose your health information in response to a request received from a law enforcement official to report criminal activity or to respond to a subpoena, court order, warrant, summons, or similar process.
7. **Coroners, Medical Examiners, or Funeral Directors.** We may disclose your health information to a coroner or medical examiner for the purpose of identifying a deceased individual or to determine the cause of death. We also may disclose your health information to a funeral director for the purpose of carrying out his/her necessary activities.
8. **Organ Procurement Organizations or Tissue Banks.** If you are an organ donor, we may disclose your health information to organizations that handle organ procurement, transplantation, or tissue banking for the purpose of facilitating organ or tissue donation or transplantation.
9. **Research.** We may use or disclose your health information for research purposes under certain limited circumstances. Because all research projects are subject to a special approval process, we will not use or disclose your health information for research purposes until the particular research project for which your health information may be used or disclosed has been approved through this special approval process. However, we may use or disclose your health information to individuals preparing to conduct the research project, in order to assist them in identifying residents with specific health care needs who may qualify to participate in the research project. Any use or disclosure of your health information which is done for the purpose of identifying qualified participants will be conducted onsite at our facility. In most instances, we will ask for your specific permission to use or disclose your health information if the researcher will have access to your name, address or other identifying information.
10. **To Avert a Serious Threat to Health or Safety.** We may use or disclose your health information when necessary to prevent a serious threat to the health or safety of you or other individuals.
11. **Military and Veterans.** If you were a member of the armed forces, we may use or disclose your health information as required by the Veteran's Administration.
12. **National Security and Intelligence Activities.** We may use or disclose your health information to authorized federal officials for purposes of intelligence, counterintelligence, and other national security activities, as authorized by law.

E. USES AND DISCLOSURES PURSUANT TO YOUR WRITTEN AUTHORIZATION.

Except for the purposes identified above in Sections B through D, we will not use or disclose your health information for any other purposes unless we have your specific written authorization. You have the right to revoke a written authorization at any time as long as you do so in writing. If you revoke your authorization, we will no longer use or disclose your health information for the purposes identified in the authorization, except to the extent that we have already taken some action in reliance upon your authorization.

Your written authorization is required for the following uses or disclosures of your health information:

1. Uses/disclosures for marketing purposes
2. Sale of protected health information (PHI)
3. Most uses/disclosures of psychotherapy notes
4. Other uses/disclosures not described in this Notice of Privacy Practices

F. YOUR RIGHTS REGARDING YOUR HEALTH INFORMATION.

You have the following rights regarding your health information. You may exercise each of these rights by providing us with the completed form that you can obtain from Administration. In some instances, we may charge you for the cost(s) associated with providing you the requested information. Additional information regarding how to exercise your rights, and the associated costs, can be obtained from Administration.

1. **Right to Inspect and Copy.** You have the right to inspect and copy health information that may be used to make decisions about your care. We may deny your request to inspect and copy your health information in certain limited circumstances. If you are denied access to your health information, you may request that the denial be reviewed.
2. **Right to Amend.** You have the right to request an amendment of your health information that is maintained by or for our facility and is used to make health care decisions about you. We may deny your request if it is not properly submitted or does not include a reason to support your request. We may also deny your request if the information sought to be amended: (a) was not created by us, unless the person or entity that created the information is no longer available to make the amendment; (b) is not part of the information that is kept by or for our facility; (c) is not part of the information which you are permitted to inspect and copy; (d) is accurate and complete.
3. **Right to an Accounting of Disclosure.** You have the right to request an accounting of the disclosures of your health information made by us. This accounting will not include disclosures of health information that we made for purposes of care, payment or operations or pursuant to a written authorization that you have signed.
4. **Right to Request Restrictions.** You have the right to request a restriction or limitation on the health information we use or disclose about you for care, payment, or operations. You also have the right to request a limit on the health information we disclose about you to someone, such as a family member or friend, who is involved in your care or in the payment of your care. For example, you could ask that we not use or disclose information regarding a particular care that you received. We are not required to agree to your request. If we do agree, that agreement must be in writing and signed by you and us.
5. **Right to Request Confidential Communications.** You have the right to request that we communicate with you about your health care in a certain way or at a certain location. For example, you can ask that we only contact you by mail.
6. **Right to a Paper Copy of this Notice.** You have the right to receive a paper copy of this Notice. You may ask us to give you a copy of this Notice at any time. Even if you have agreed to receive this Notice electronically, you are still entitled to a paper copy of this Notice.
7. **Right to Be Notified of Breach of Unsecured PHI.** You have the right to be notified when a breach of your unsecured protected health information (PHI) has occurred.

G. QUESTIONS OR COMPLAINTS.

If you have any questions regarding this Notice or wish to receive additional information about our privacy practices, please contact David Kohnstamm at 503-535-4000. If you believe your privacy rights have been violated, you may file a complaint with our facility or with the Secretary of the Department of Health and Human Services (HHS). To file a complaint with our facility, contact our Privacy Officers at 6125 SW Boundary St. Portland, OR 97221-1019. All complaints must be submitted in writing. You will not be penalized for filing a complaint.