

# Central GA Pulmonary Associates

## NOTICE OF PRIVACY PRACTICES

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.

As a health care provider, CGPA uses confidential personal health information about patients (also known as “protected health information” or “PHI”). CGPA protects the privacy of this information, and this information is also protected from disclosure by law. In certain specific circumstances, pursuant to this Notice of Privacy Practices, permission from the patient, or applicable laws and regulations, CGPA may use or disclose PHI to other parties. This Notice describes the categories of permitted uses and disclosures.

**Uses and Disclosures for Treatment, Payment and Health Care Operation.** CGPA may use or disclose PHI about you for purposes of treatment, payment and health care operations without obtaining written authorization from you.

**Treatment.** CGPA may use and disclose PHI in the course of providing, coordinating or managing your medical treatment, including the disclosure of PHI for treatment activities of another health care provider. These types of uses and disclosures may occur between physicians, nurses, medical students, and other health care professionals who are involved in your care. For example, if you are being treated by your primary care physician, that physician may need to disclose PHI to a specialist physician with whom he or she consults regarding your condition, or to a nurse who is assisting in your care. Different departments of the hospital also may share medical information about you in order to deliver care to you, such as prescriptions, lab work, and x-rays. CGPA also may disclose medical information about you to people outside CGPA who may provide medical care after you leave the hospital.

**Payment.** CGPA may use and release PHI in order to bill and collect payment for the health care services provided to you. For example, CGPA may need to give PHI to your insurance company in order to be paid for the services provided to you. CGPA may also disclose PHI to its business associates, such as billing companies, claims processing companies, and others that assist in processing health claims.

**Health Care Operations.** CGPA may use and disclose PHI as part of its operations, including for quality assessment and improvement, such as evaluating the treatment and services you receive and the performance of our staff in caring for you; compliance and risk management activities; planning and development; and management and administration. CGPA may disclose PHI to physicians, nurses, technicians, students, attorneys, consultants, accountants and others for review and learning purposes, to help assure that CGPA is complying with all applicable laws, and to help CGPA continue to provide high quality health care to its patients. CGPA also may disclose PHI to other health care providers and health plans for their quality assessment and improvement activities, credentialing and peer review activities, and health care fraud and abuse detection or compliance activities, provided that they have, or have had in the past, a relationship with the patient who is the subject of the information.

**Sharing PHI Among CGPA and its Medical Staff.** CGPA and the physicians and other health care providers of the CGPA medical staff work together in an organized health care arrangement to provide medical services to you when you are a patient at CGPA. CGPA and the members of its medical staff will share with each other PHI as necessary to carry out their treatment, payment and health care operations relating to the provision of care to patients at CGPA.

**Other Uses and Disclosures for Which Authorization is Not Required.** In addition to using or disclosing PHI for treatment, payment and health care operations, CGPA may use and disclose PHI without your written authorization under the following circumstances:

**As Required by Law and Law Enforcement.** CGPA may use or disclose PHI when required to do so by law. CGPA also may disclose PHI when ordered to do so in a judicial or administrative proceeding: to identify or locate a suspect, fugitive, material witness, or missing person; when dealing with gunshot and other wounds; regarding criminal conduct; to report a crime, the location of the crime or victims, or the identity, description or location of a person who committed a crime; or for other law enforcement purposes.

**For Public Health Activities and Public Health Risks.** CGPA may disclose PHI to government officials in charge of collecting information about: births and deaths; preventing and controlling disease; reports of child abuse or neglect and of other victims of abuse, neglect, or domestic violence; reactions to medicines or product defects or problems; or to notify a person who may have been exposed to a communicable disease or may be at risk of contracting or spreading a disease or condition.

**For health oversight activities.** CGPA may disclose PHI to the government for oversight activities authorized by law, such as: audits, investigations, inspections, licensure or disciplinary actions, and other proceedings, activities necessary for monitoring the health care system, government programs, and compliance with civil rights laws.

**To Avoid a Serious Threat to Health or Safety.** CGPA may use and disclose PHI to law enforcement personnel or other appropriate persons, to prevent or lessen a serious threat to the health or safety of a person or the public.

**Specialized government functions.** CGPA may use and disclose PHI of military personnel and veterans under certain circumstances. CGPA may also disclose PHI to authorized federal officials for intelligence, counterintelligence, and other national security activities, and for the provision of protective services to the President or other authorized persons or foreign heads of state or to conduct special investigations.

**Inmates.** Under certain circumstances, CGPA may release to a correctional institution or law enforcement official PHI regarding an inmate of the correctional institution or under the custody of the law enforcement official.

**Workers' Compensation.** CGPA may disclose PHI to comply with workers' compensation or other similar laws. These programs provide benefits for work-related injuries or illnesses.

**Appointment Reminders; Health-related Benefits and Services.** CGPA may use and release your PHI to contact you and remind you of an appointment, or to inform you of treatment alternatives or other health-related benefits and services that may be of interest to you, such as disease management programs.

**Disclosures to You or for HIPAA Compliance Investigations.** CGPA may disclose your PHI to you or your personal representative, and it is required to do so in certain circumstances described below in connection with your rights of access to your PHI and to an accounting of certain disclosures of your PHI. CGPA must disclose your PHI to the Secretary of the United States Department of Health and Human Services when requested in order to investigate CGPA's compliance with privacy regulations issued under the federal Health Insurance Portability and Accountability Act of 1996 ("HIPAA"). Uses and Disclosures Subject to State and Other Laws. In addition to the federal privacy regulations that require this notice (called the "HIPAA" regulations), there are Georgia and other federal health information privacy laws. These laws on occasion may require your specific written permission prior to disclosures of certain particularly sensitive information (such as mental health, drug/alcohol abuse, or HIV/AIDS information) in circumstances that the HIPAA regulations would permit disclosure without your permission. CGPA is required to comply not only with the HIPAA regulations but also with any other applicable laws that impose more strict nondisclosure requirements.

**Uses and Disclosures to Which You Have an Opportunity to Object.** You will have the opportunity to object to these types of uses and disclosures of PHI that CGPA may make:

**Disclosures to Individuals Involved in Your Health Care or Payment for Your Health Care.** Unless you object, CGPA may release your PHI to a family member, other relative, friend, or other person you identify as involved in your health care or payment for your health care. CGPA also may notify those people about your location or condition.

**Other Uses and Disclosures of PHI for Which Authorization is Required.** Other types of uses and disclosures of your PHI not described above will be made only with your written authorization, which with some limitations you have the right to revoke in writing.

**Regulatory Requirements.** CGPA is required by law to keep your PHI private, to provide individuals with notice of its legal duties and privacy practices with respect to PHI, and to abide by the terms described in this Notice. CGPA reserves the right to change the terms of this Notice and of its privacy policies, and to make the new terms applicable to all of the PHI it maintains. Before CGPA makes an important change to its privacy policies, it will promptly revise this Notice and post a new Notice in all CGPA public access areas. You have the following rights regarding your PHI:

**Restrictions and Communications of PHI.** You may request that CGPA restrict the use and disclosure of your PHI. CGPA is not required to agree to any restrictions you request, but if CGPA does so it will be bound by the restrictions to which it agrees except in emergency situations. You have the right to request that communications of PHI to you from CGPA be made by particular means or at particular locations. For instance, you might request that communications be made to your work address, or by e-mail rather than regular mail. Your requests must be made in writing and sent to:

Central GA Pulmonary Associates, LLC  
840 Pine Street Ste 780  
Macon, GA 31201

CGPA will agree to your reasonable requests without requiring you to provide a reason for your request.

**Inspect and Copy PHI.** Generally, you have the right to inspect and copy your PHI that CGPA maintains, provided that you make your request in writing to:

Central GA Pulmonary Associates, LLC  
840 Pine Street Ste 780  
Macon, GA 31201

Within thirty (30) days of receiving your request (unless extended by an additional thirty (30) days), CGPA will inform you of the extent to which your request has or has not been granted. In some cases, CGPA may provide you a summary of the PHI you request if you agree in advance to such a summary and any associated fees. If you request copies of your PHI or agree to a summary of your PHI, CGPA may charge a reasonable fee to cover copying, postage, and related costs. If CGPA denies access to your PHI, it will explain the basis for the denial and your opportunity to have your request and the denial reviewed by a licensed health care professional (who was not involved in the initial denial decision) designated as a reviewing official. If CGPA does not maintain the PHI you request, but knows where it is located, it will tell you whom to contact.

**Correct or Supplement PHI.** If you believe that your PHI maintained by CGPA contains an error or needs to be updated, you have the right to request that CGPA correct or supplement your PHI. Your request must be made in writing to:

Central GA Pulmonary Associates, LLC  
840 Pine Street Ste 780  
Macon, GA 31201

And it must explain why you are requesting an amendment to your PHI. Within sixty (60) days of receiving your request (unless extended by an additional thirty (30) days), CGPA will inform you of the extent to which your request has or has not been granted. CGPA generally can deny your request if it relates to PHI: (i) not created by CGPA; (ii) that is not part of the records CGPA maintains; (iii) that is not subject to being inspected by you; or (iv) that is accurate and complete. If your request is denied, CGPA will provide you a written denial that explains the reason for the denial and your rights to: (i) file a statement disagreeing with the denial; (ii) if you do not file a statement of disagreement, submit a request that any future disclosures of the relevant PHI be made with a copy of your request and CGPA's denial attached; and (iii) complain about the denial.

**Right to Accounting of Disclosures.** You generally have the right to request and receive a list of the disclosures of the PHI CGPA has made at any time during the five (5) years prior to the date of your request (provided that such a list would not include releases made prior to June 1, 2009). The list will not include disclosure for which you have provided a written authorization, and does not include certain uses and disclosures to which this Notice already applies, such as those: (i) for treatment, payment, and health care operations; (ii) made to you; (iii) for CGPA's patient directory or to persons involved in your health care; (iv) for national security or intelligence purposes; or (v) to correctional institutions or law enforcement officials.

You should submit any such request to:

Central Georgia Pulmonary Associates  
840 Pine Street Ste 780  
Macon, Georgia 31201

And within sixty (60) days of receiving your request (unless extended by an additional thirty (30) days), CGPA will respond to you regarding the status of your request. CGPA will provide the list to you at for a fee of \$15.00, but if you ask for more than one request in a year you will be charged a fee of \$25 for each additional request. You have the right to receive a paper copy of this Notice upon request, even if you have agreed to receive this Notice electronically. You may complain to CGPA if you believe your privacy rights with respect to your PHI have been violated by contacting CGPA at 478-744-2445 and submitting a written complaint to:

Patricia Plummer  
Central Georgia Pulmonary Associates, LLC  
840 Pine Street Ste 780  
Macon, GA 31201

CGPA will not penalize you or retaliate against you for filing a complaint regarding CGPA's privacy practices. You also have the right to file a complaint with the Secretary of the Department of Health and Human Services.

If you have any questions about this Notice, please contact CGPA Corporate Compliance Officer (Patricia Plummer) at 478-744-2445.