



**HIPAA – Health Insurance Portability & Accountability Act
Notice of Privacy Practices**

- I. THIS NOTICE DESCRIBES HOW HEALTH INFORMATION ABOUT YOU MAY BE USED AND DISCLOSED AND HOW YOU CAN GET ACCESS TO THIS INFORMATION. PLEASE REVIEW THIS NOTICE CAREFULLY.**

- II. COEUR D'ALENE SENIOR LIVING HAS A LEGAL DUTY TO SAFEGUARD YOUR PROTECTED HEALTH INFORMATION (PHI).**

Coeur d'Alene Senior Living is required to protect the privacy of your health information.

Coeur d'Alene Senior Living calls this information **“protected health information,”** or **“PHI”** for short and it includes information that can be used to identify you. Coeur d'Alene Senior Living must provide you with this notice about its privacy practices that explains how, when and why Coeur d'Alene Senior Living may use and disclose your PHI. With some exceptions, Coeur d'Alene Senior Living may not use or disclose any more of your PHI than is necessary to accomplish the purpose of the use or disclosure.

Coeur d'Alene Senior Living reserves the right to change the terms of this notice and our privacy policies at any time. Any changes will not apply to the PHI Coeur d'Alene Senior Living already has used or disclosed before the effective date of the amended notice. Before Coeur d'Alene Senior Living makes any important change to its policies, Coeur d'Alene Senior Living will promptly change this notice on its web site, post a new notice in each of our residences' lobbies, and provide you a copy of the new notice.

III. UNDERSTANDING YOUR DESIGNATED RECORD SET

During the time of your residency with us, a record of your care and services is made. This record contains health and financial information. Typically, this record contains information about your condition, the care, services and treatment we provide, and payment for the care, treatment and services. We may use and or disclose this information to:

- Plan your care, services and treatment
- Communicate with other health professionals involved in your care
- Document the care you receive
- Educate health professionals
- Provide information for medical research
- Provide information to public health officials
- Evaluate and improve the care we provide
- Obtain payment for the care we provide

Understanding what is in your record and how your health information is used helps you to:

- Ensure it is accurate
- Better understand who may access your health information
- Make more informed decisions when authorizing disclosure to others

IV. HOW COEUR D'ALENE SENIOR LIVING MAY USE AND DISCLOSE YOUR PROTECTED HEALTH INFORMATION

When you move into a Coeur d'Alene Senior Living residence, you provide information regarding your health that assists in planning services you may need. Coeur d'Alene Senior Living uses and discloses this information for many different reasons and some of this information is related to your health and it is that information that is the subject of this notice. For some of these uses or disclosures, Coeur d'Alene Senior Living needs your specific authorization. For some of these uses or disclosures you may request the use or disclosure not be made. Understanding what is health information and how your health information is used helps you to ensure its accuracy, better understand who, what, when, where and why others may access your health information, and make more informed decisions when authorizing Coeur d'Alene Senior Living to disclose this health information to others. Below, Coeur d'Alene Senior Living describes the different categories of our uses and disclosures and gives you some examples of each category.

Uses and Disclosures Relating to Treatment, Payment, or Health Care Operations Without Your Prior Consent or Authorization.

Coeur d'Alene Senior Living may use and disclose your PHI for the following reasons:

1. **For treatment.** Coeur d'Alene Senior Living may disclose your PHI to physicians, nurses, therapists, home health agents, medical students, and other health care professionals who provide you with health care services or are involved in your care. For example, if you're being treated for a heart disease, Coeur d'Alene Senior Living may disclose your PHI to your physician in order to coordinate the services you received in the residence. We may disclose health information to those involved in your care after you are discharged from our care. For example, we may provide a discharge summary to your physician at the conclusion of your stay in our Residence.
2. **To obtain payment for treatment.** Coeur d'Alene Senior Living may use and disclose your PHI in order to bill and collect payment for services provided to you. For example, Coeur d'Alene Senior Living may provide portions of your PHI to our billing department or your long term care insurance or health plan to get paid for the services Coeur d'Alene Senior Living provided to you and payable under your plan. Coeur d'Alene Senior Living may also provide your PHI to our business associates, such as billing companies, attorneys, accountants, and claims processing companies, and other that process our health care claims.
3. **For health care operations.** Coeur d'Alene Senior Living may disclose your PHI in order to operate the residence. For example, Coeur d'Alene Senior Living will post your name outside of your living unit and may use your PHI in order to evaluate the quality of your care. Coeur d'Alene Senior Living may also provide your PHI to its accountants, attorneys, consultants, and others in order to make sure Coeur d'Alene Senior Living is complying with the laws that affect the residence. Health information about you may be used by our various corporate offices for business development and planning, cost management analyses, insurance claims management, risk management activities, and in developing and testing information systems and programs. We may also use and disclose information for professional review, performance evaluation, and for training programs. Other aspects of health care operations that may require use and disclosure of your health information include accreditation,

certification, licensing and credentialing activities, review and auditing, including compliance reviews, medical review, legal services and compliance programs. Your health information may be used and disclosed for the business management and general activities of the Residence including resolution of internal grievances, customer service and due diligence in connection with a sale or transfer of the Residence.

4. **To our business associates.** Coeur d'Alene Senior Living sometimes contracts with individuals and entities (called business associates) to perform various functions on our behalf or to provide services to you. To perform these functions or services, business associates may receive, create, maintain, use or disclose your PHI, but only after they have agreed, in writing, to safeguard your PHI.

Other areas your protected health information may be used without your authorization:

1. **When a disclosure is required by federal, state, or local law, judicial or administrative proceedings, or law enforcement.** For example, Coeur d'Alene Senior Living makes disclosures when a law requires that Coeur d'Alene Senior Living report information to government agencies and law enforcement personnel about victims of abuse, abuse and neglect, or domestic violence; when dealing with gunshot and other wounds; or when ordered in judicial or administrative proceedings.
2. **For public health activities.** For example, Coeur d'Alene Senior Living reports information about deaths, and various diseases to government officials in charge of collecting that information, and Coeur d'Alene Senior Living provides to coroners, medical examiners, and funeral directors necessary information relating to an individual's death.
3. **For health oversight activities.** For example, Coeur d'Alene Senior Living will provide information to assist the government when it conducts a survey, investigation or inspection of our residences.
4. **For purpose of organ donation.** Coeur d'Alene Senior Living may notify organ procurement organizations to assist them in organ, eye, or tissue donation and transplants.
5. **For research purposes.** In certain circumstances, Coeur d'Alene Senior Living may provide PHI in order to conduct medical research.
6. **To avoid harm.** In order to avoid a serious threat to the health or safety of a person or the public, Coeur d'Alene Senior Living may provide PHI to law enforcement personnel or persons able to prevent or lessen such harm.
7. **For specific government functions.** Coeur d'Alene Senior Living may disclose PHI of military personnel and veterans in certain situations. Coeur d'Alene Senior Living may disclose PHI for national security purposes, such as protecting the president of the United States or conducting intelligence operations.
8. **For workers' compensation purposes.** Coeur d'Alene Senior Living may provide PHI in order to comply with workers' compensation laws.
9. **Appointment reminders and health-related benefits or services.** Coeur d'Alene Senior Living may use PHI to provide medical appointment reminders and/or give you information about treatment alternatives, or other health care services or benefits Coeur d'Alene Senior Living offer by way of preferred providers or senior services.
10. **Fundraising activities.** Coeur d'Alene Senior Living may use PHI to raise funds in the community for various organizations such as Coeur d'Alene Homes, Alzheimer Association, etc.
11. **Change of Ownership.** In the event that Coeur d'Alene Senior Living is sold or merged with another organization, your health information/record will become the property of the new owner, although you will maintain the rights under this notice.
12. **Sign In and Out Log.** Coeur d'Alene Senior Living may use and disclose PHI about you by having you sign in and sign out when you are leaving the residence. Coeur d'Alene Senior Living may note that when leaving the residence we may have a need to call out your name if it is necessary to locate you to provide services, such as medication reminders and assistance and to determine whether or not you have returned safely.

Uses and Disclosures that Require You to Have the Opportunity to Object.

1. **Resident directories.** Coeur d'Alene Senior Living may include your name, location in this residence, and general condition in our resident directory for use by clergy and visitors who ask for you by name, unless you object in whole or part.
2. **Disclosures to family, friends, or others.** Coeur d'Alene Senior Living may provide your PHI to a family member, friend, or other person that you indicate is involved in your care or the payment for your health care generally and services at Coeur d'Alene Senior Living unless you object in whole or in part.
3. **All Other Uses and Disclosures Require Your Prior Written Authorization.** Other uses and disclosures of health information not covered by this Notice or the laws that apply to us will be made only with your written permission. If you provide us permission to use or disclose health information about you, you may revoke that permission, in writing, at any time. If you revoke your permission, we will no longer use or disclose health information about you for the reasons covered by your written authorization. You understand that we are unable to take back any disclosures we have already made with your permission.

V. WHAT RIGHTS YOU HAVE REGARDING YOUR PHI

You have the following rights with respect to your PHI:

1. **The right to Request Limits on Uses and Disclosures of Your PHI.** You have the right to ask that Coeur d'Alene Senior Living limit how Coeur d'Alene Senior Living uses and discloses your PHI. Coeur d'Alene Senior Living will consider your request but is not legally required to accept it. If Coeur d'Alene Senior Living accepts your request, Coeur d'Alene Senior Living will request you put any limits in writing and it will abide by them except in emergency situations. You may not limit the uses and disclosures that Coeur d'Alene Senior Living are legally required or allowed to make.
2. **The Right to Choose How Coeur d'Alene Senior Living Sends PHI to You.** You have the right to ask that Coeur d'Alene Senior Living send information to you at an alternate address or by alternate means (for example, e-mail instead of regular mail). Coeur d'Alene Senior Living must agree to your request so long as Coeur d'Alene Senior Living can easily provide it in the format you requested.
3. **The Right to See and Get Copies of Your PHI.** In most cases, you have the right to look at or get copies of your PHI that Coeur d'Alene Senior Living have, but you may be asked to make the request in writing. In certain situations, Coeur d'Alene Senior Living may deny your request. If Coeur d'Alene Senior Living does deny your request, Coeur d'Alene Senior Living will tell you, in writing, our reasons for the denial and explain your right to have the denial reviewed. There may be charges for copies.
4. **The Right to Get a List of the Disclosures Coeur d'Alene Senior Living Has Made.** You have the right to get a list of instances in which Coeur d'Alene Senior Living had disclosed your PHI other than those used or disclosed without the need for prior authorization, such as those made for treatment, payment, or health care operations, directly to you, to your family, or in our residence directory. The list also won't include uses and disclosures made under Part III, Section B above numbers 1 through 12 above.
5. **The Right to Correct or Update Your PHI.** If you believe there is a mistake in your PHI or that a piece of important information is missing, you have the right to request that Coeur d'Alene Senior Living correct the existing information or add the missing information. You must provide the request and your reason for the request in writing. Coeur d'Alene Senior Living will respond within 60 days of receiving your request. Coeur d'Alene Senior Living may deny your request in writing if the PHI is (i) correct and complete, (ii) not created by us, (iii) not allowed to be disclosed, or (iv) not part of our records. Our written denial will state the reasons for the denial and explain your right to file a written statement of disagreement with the denial. If you don't file one, you have the right to request that your request and

our denial be attached to all future disclosures of your PHI. If Coeur d'Alene Senior Living approves your request, Coeur d'Alene Senior Living will make the change/s to your PHI, tell your that Coeur d'Alene Senior Living have done it, and tell others that need to know about the change to your PHI.

HOW TO COMPLAIN ABOUT PRIVACY PRACTICES

If you think that Coeur d'Alene Senior Living may have violated your privacy rights, or you disagree with a decision Coeur d'Alene Senior Living made about access to your PHI, you may file a complaint with **Ann Johnson, Executive Director, Coeur d'Alene Senior Living, 702 W Walnut Ave, Coeur d'Alene, ID 83814, 208-664-2680 ext 12.**

All complaints must be filed in writing on a form provided by the residence. You also may send a written complaint to the Secretary of the Department of Health and Human Services. Coeur d'Alene Senior Living will take no retaliatory action against you if you file a complaint about our privacy practices. This complaint should be addressed to the Department of Health and Human Services at the Office of Civil Rights, Hubert H. Humphrey Building, 200 Independence Avenue, S.W., Room 509F HHH Building, Washington, DC 20201.

PERSON TO CONTACT FOR INFORMATION ABOUT THIS NOTICE

If you have any questions about this notice and would like additional information, you may contact our Privacy Officer, **Tina Eckhardt Coeur d'Alene Senior Living, 702 W Walnut Ave, Coeur d'Alene, ID 83814, 208-664-2680 ext 11.**

Resident Printed Name

Signature of Resident or Representative

Date