

**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.**

VitalCaring Group and its employees are dedicated to maintaining the privacy of your personal health information (“PHI”), as required by applicable federal and state laws. These laws require us to provide you with this Notice of Privacy Practices and to inform you of your rights and our obligations concerning Protected Health Information, or PHI, which is information that identifies you and that relates to your physical or mental health condition. We are required to follow the privacy practices described below while this Notice is in effect.

A. **Permitted Disclosures of PHI**. We may disclose your PHI for the following reasons:

1. **Treatment**. We may disclose your PHI to a physician or other health care provider providing treatment to you. For example, we may disclose medical information about you to physicians, nurses, technicians, or personnel who are involved with the administration of your care.
2. **Payment**. We may disclose your PHI to bill and collect payment for the services we provide to you. For example, we may send a bill to you or to a third-party payor for the rendering of services by us. The bill may contain information that identifies you, your diagnosis, and the procedures and supplies used. We may need to disclose this information to insurance companies to establish insurance eligibility benefits for you. We may also provide your PHI to our business associates, such as billing companies, claims processing companies, and others that process our health care claims.
3. **Health Care Operations**. We may disclose your PHI in connection with our healthcare operations. Healthcare operations include quality assessment activities, reviewing the competence or qualifications of healthcare professionals, evaluating provider performance, and other business operations. For example, we may use your PHI to evaluate the performance of the healthcare services you received. We may also provide your PHI to accountants, attorneys, consultants, and others to make sure we comply with the laws that govern us.
4. **Emergency Treatment**. We may disclose your PHI if you require emergency treatment or are unable to communicate with us.
5. **Family and Friends**. We may disclose your PHI to a family member, friend, or any other person who you identify as being involved with your care or payment for care unless you object.

6. **Serious Threat to Health or Safety.** We may disclose your PHI if we believe it is necessary to avoid a serious threat to the health and safety of you or the public.
7. **Public Health.** We may disclose your PHI to public health or other authorities charged with preventing or controlling disease, injury or disability, or charged with collecting public health data.
8. **Victims of Abuse, Neglect or Domestic Violence.** We may disclose medical information about you to a government authority authorized by law to receive reports of abuse, neglect, or domestic violence if we believe you are a victim of abuse, neglect or domestic violence. This will occur to the extent the disclosure is:
  - a. required by law;
  - b. agreed to by you; or
  - c. authorized by law and we believe the disclosure is necessary to prevent serious harm to you or to other potential victims, or, if you are incapacitated and certain other conditions are met, a law enforcement or other public official represents that immediate enforcement activity depends on the disclosure.
9. **Health Oversight Activities.** We may disclose your PHI to a health oversight agency for activities authorized by law. These activities include audits; civil, administrative or criminal investigations or proceedings; inspections; licensure or disciplinary actions; or other activities necessary for oversight of the health care system, government programs and compliance with civil rights laws.
10. **Judicial and Administrative Proceedings.** We may disclose medical information about you in the course of any judicial or administrative proceedings in response to an order of the court or administrative tribunal. We also may disclose medical information about you in response to a subpoena, discovery request or other legal process but only if efforts have been made to tell you about the request or to obtain an order protecting or to obtain an order protecting the information disclosed.
11. **Research.** We may disclose your PHI for certain research purposes, but only if we have protections and protocols in place to ensure the privacy of your PHI.
12. **Workers' Compensation.** We may disclose your PHI to comply with laws relating to workers' compensation or other similar programs.
13. **Specialized Government Activities.** If you are active military or a veteran, we may disclose your PHI as required by military command authorities. We may also be required to disclose PHI to authorized federal officials for the conduct of intelligence or other national security activities.

14. **Organ Donation**. If you are an organ donor, or have not indicated that you do not wish to be a donor, we may disclose your PHI to organ procurement organizations to facilitate organ, eye or tissue donation and transplantation.
15. **Coroners, Medical Examiners, Funeral Directors**. We may disclose your PHI to coroners or medical examiners for the purposes of identifying a deceased person or determining the cause of death, and to funeral directors as necessary to carry out their duties.
16. **Disaster Relief**. Unless you object, we may disclose your PHI to a governmental agency or private entity (such as FEMA or Red Cross) assisting with disaster relief efforts.
17. **To Avert Serious Threat to Health or Safety**. We may disclose PHI about you if we believe the use or disclosure is necessary to prevent or lessen a serious or imminent threat to the health or safety of a person or the public. We also may release information about you if we believe the disclosure is necessary for law enforcement authorities to identify or apprehend an individual who admitted participation in a violent crime or from lawful custody.

**B. Disclosures Requiring Written Authorization**

1. **Not Otherwise Permitted**. In any other situation not described in Section A above, we may not disclose your PHI without your written authorization.
2. **Psychotherapy Notes**. We must receive your written authorization to disclose psychotherapy notes, except for certain treatment, payment, or healthcare operations activities.
3. **Marketing and Sale of PHI**. We must receive your written authorization for any disclosure of PHI for marketing purposes or for any disclosure that is a sale of PHI.

**C. Your Rights**

1. **Right to Receive a Paper Copy of This Notice**. You have the right to receive a paper copy of this Notice upon request.
2. **Right to Access PHI**. You have the right to inspect and copy your PHI for as long as we maintain your medical record. You must make a written request for access to the Compliance Officer or designee at the address listed at the end of this Notice. We may charge you a reasonable fee for the processing of your request and the copying of your medical record pursuant to [insert applicable state law related to copying medical records]. In certain circumstances, we may deny your request to access your PHI, and you may request that we reconsider our denial. Depending on the reason for the denial, another licensed healthcare professional chosen by us may review your request and the denial.
3. **Right to Request Restrictions**. You have the right to request a restriction on the use or disclosure of your PHI for the purpose of treatment, payment, or healthcare operations, except

for in the case of an emergency. You also have the right to request a restriction on the information we disclose to a family member or friend who is involved with your care or the payment of your care. However, we are not legally required to agree to such a restriction.

4. **Right to Restrict Disclosure for Services Paid by You in Full.** You have the right to restrict the disclosure of your PHI to a health plan if the PHI pertains to health care services for which you paid in full directly to us.
  5. **Right to Request Amendment.** You have the right to request that we amend your PHI if you believe it is incorrect or incomplete, for as long as we maintain your medical record. We may deny your request to amend if (a) we did not create the PHI, (b) is not information that we maintain, (c) is not information that you are permitted to inspect or copy (such as psychotherapy notes), or (d) we determine that the PHI is accurate and complete.
  6. **Right to an Accounting of Disclosures.** You have the right to request an accounting of disclosures of PHI made by us (other than those made for treatment, payment or health care operations purposes) during the 6 years prior to the date of your request. You must make a written request for an accounting, specifying the time period for the accounting, to the [Privacy/Compliance Officer] at the address listed at the end of this Notice.
  7. **Right to Confidential Communications.** You have the right to request that we communicate with you about your PHI by certain means or at certain locations. For example, you may specify that we call you only at your home phone number, and not at your work number. You must make a written request, specifying how and where we may contact you, to the [Privacy/Compliance Officer] at the address listed at the end of this Notice.
  8. **Right to Notice of Breach.** You have the right to be notified if we or one of our business associates become aware of a breach of your unsecured PHI.
  9. **Direct Contact with You.** We may use your PHI to contact you to remind you that you have an appointment, or to inform you about treatment alternatives or other health-related benefits and services that may be of interest to you.
- D. **Changes to this Notice.** We reserve the right to change this Notice at any time in accordance with applicable law. Prior to a substantial change to this Notice related to the uses or disclosures of your PHI, your rights or our duties, we will revise and distribute this Notice.
- E. **Acknowledgment of Receipt of Notice.** We will ask you to sign an acknowledgment that you received this Notice.
- F. **Questions and Complaints.** If you would like more information about our privacy practices or have questions or concerns, please contact us. If you are concerned that we may have violated your

privacy rights, or you disagree with a decision we made regarding the use, disclosure, or access to your PHI, you may complain to us by contacting the [Privacy/Compliance Officer] at the address and phone number at the end of this Notice. You also may submit a written complaint to the U.S. Department of Health and Human Services. We will provide you with the address to file such a complaint upon request.

We support your right to the privacy of your PHI. We will not retaliate in any way if you choose to file a complaint with us or with the U.S. Department of Health and Human Services.

Please direct any of your questions or complaints to: [compliance@vitalcaring.com](mailto:compliance@vitalcaring.com) or 800-849-9799

This notice is effective October 06, 2023.