



Notice of Privacy Practices

The purpose of this notice is to inform you of how National University of Natural Medicine (NUNM) uses and discloses your Protected Health Information. Your Protected Health Information is information that you have given to us regarding your health condition and treatment, our notes regarding your health condition and treatment and information that we have gathered from other sources regarding your health condition and treatment.

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.

With respect to your Protected Health Information, NUNM is required by law to 1) Maintain your privacy and confidentiality, 2) Provide you with explanation of our privacy practices, 3) Provide you with information about your rights and how to exercise those rights, and 4) Abide by the terms of this Notice.

STANDARD PRACTICE DISCLOSURES OF YOUR PROTECTED HEALTH INFORMATION

Please be aware that NUNM makes every effort possible to protect your privacy and the confidentiality of your Protected Health Information. We may disclose your healthcare information for the following reasons:

- **Treatment:** We may disclose your Protected Health Information to other healthcare professionals for the purpose of treatment. For example, it may be necessary to seek consultation regarding your condition from other healthcare providers associated with NUNM.
- **Healthcare Operations:** We may review your Protected Health Information in order to meet our goals as a healthcare provider and teaching clinic.
 - As a teaching clinic, for educational purposes students may be involved in discussion of your treatment and Protected Health Information.
 - In the event of your primary healthcare practitioner's absence, it is our policy to provide an authorized NUNM healthcare practitioner to substitute or provide on-call coverage, thereby providing continuity of care for our patients. We are not always able to notify you of such changes.
 - We may use a limited amount of your Protected Health Information for marketing purposes – we may contact you regarding fund-raising activities.
 - NUNM is part of an organized health care arrangement including participants in OCHIN. A current list of OCHIN participants is available at www.ochin.org. As a business associate of NUNM, OCHIN supplies information technology and related services to NUNM and other OCHIN participants. OCHIN also engages in quality assessment and improvement activities on behalf of its participants. For example, OCHIN coordinates clinical review activities on behalf of participating organizations to establish best practice standards and access clinical benefits that may be derived

from the use of electronic health record systems. OCHIN also helps participants work collaboratively to improve the management of internal and external patient referrals. Your health information may be shared by NUNM with other OCHIN participants when necessary for health care operation purposes of the organized health care arrangement.

- **Payment:** We may disclose your Protected Health Information to your insurance provider for the purpose of payment. Billing statements submitted to insurance providers contain medical information such as diagnosis and health care services received.
- **Research:** The NUNM Health Centers serves a growing number of patients and the educational needs of the University's medical students. Student clinicians may use de-identified patient files for the basis of case presentations to their supervising physicians. Once a patient file has had all 18 identifiers removed as defined by the HIPAA Safe Harbour Method and the protected health information has been de-identified by a HIPAA expert, it is no longer protected health information and thus can be used for a medical student case study. The Privacy Rule does not restrict the use or disclosure of de-identified health information. Under certain limited circumstances, research projects are subject to a special approval process (NUNM Scientific Review Committee and/or Institutional Research Board) which protects patients from harm, including protecting the right to privacy. Therefore, we will not use or disclose protected health information for research purposes unless the particular research project for which protected health information may be used or disclosed has been approved through this special approval process.

ADDITIONAL DISCLOSURES OF YOUR PROTECTED HEALTH INFORMATION

We may use or disclose your Protected Health Information as required by law, in the following circumstances:

- **Public Health:** As required by law, we may disclose your Protected Health Information to public health authorities for purposes related to: preventing or controlling disease, reporting births or deaths, infection exposure, reporting child abuse, neglect or domestic violence, audits by oversight agencies and concerns regarding products or medical devices to the Food and Drug Administration.
- **Law Enforcement, Court and Administrative Agencies:** We may disclose your Protected Health Information to listed agencies in order to comply with a subpoena, court order, search warrant or to protect the safety of the public.
- **Emergency Situations:** We may use or disclose your Protected Health Information in order to provide treatment to you under emergency circumstances. Also, in an emergency we may determine that it is in your best interest to disclose information to your family or friends. We will only disclose the Protected Health Information that is directly relevant to that person's involvement in your healthcare.
- **Coroners and Medical Examiners:** We may disclose your Protected Health Information to coroners or medical examiners, as necessary, in order to facilitate the duties of their jobs.
- **Worker's Compensation:** We may disclose your Protected Health Information to your employer in order to comply with state worker's compensation program laws.
- **Specialized Government Functions:** We may disclose your health information for military, national security and government benefits purposes as required by these agencies.

AUTHORIZED DISCLOSURES OF YOUR PROTECTED HEALTH INFORMATION

Third party uses and disclosures other than for the above-referenced purposes will be made only with your written authorization. As provided by law, this authorization may be revoked at any time. Revocations will be honored as of our receipt date. Examples of such disclosures include the following:

- State disability claims.
- Research – must be approved by an Institutional Review Board.
- Release of medical records to yourself or healthcare providers other than NUNM.

Please be aware that once your Protected Health Information has been disclosed due to your written permission, it may no longer be protected under these privacy laws.

It is NUNM's policy to call your home or preferred phone number with any questions. We may leave a message on your voice mail or answering machine or with a person answering the phone – no personal health information will be disclosed. You may request an alternative method of communication by NUNM at any time.

It is a courtesy of NUNM to send out electronic voice messages to your preferred phone to remind you of your appointment date and time two days prior to your appointment. No personal health information will be disclosed. Occasionally the reminder message may fail and we cannot guarantee you will receive a reminder message each time for every appointment.

CHANGES TO THIS NOTICE OF PRIVACY PRACTICES

NUNM reserves the right to amend this Notice of Privacy Practices at any time in the future. These changes may be required by federal or state laws. New provisions will be effective for all information that we maintain. In the event of amendments, we will make a revised Notice of Privacy Practices available to you.

YOUR PROTECTED HEALTH INFORMATION RIGHTS

By law, you have the following rights with respect to your Protected Health Information:

- The right to request restrictions on certain uses and disclosures of your health information. We may honor this request however, NUNM is not required to agree to the restriction that you requested.
- The right to receive confidential communications of your Protected Health Information.
- The right to inspect and copy your health information.
- The right to request that NUNM amend your Protected Health Information. Please know however, that we are not required to agree to this request.
- The right to receive a summary or accounting of NUNM's disclosures of your Protected Health Information.
- The right to a printed copy of this Notice.

EXERCISING YOUR PROTECTED HEALTH INFORMATION RIGHTS

Comments, concerns or complaints regarding your privacy rights or NUNM's privacy practices may be submitted to our Privacy Officer, Dr. Regina Dehen, by calling her office at 503-552-1966. If she is not available you may schedule an appointment to either meet or speak with her within two business days. Our commitment to you and the quality of your healthcare will not be altered should you choose to exercise these rights.

If you are not satisfied with the manner in which this office handles your complaint you may submit a formal complaint to:

Office of Civil Rights
US Department of Health and Human Services
200 Independence Avenue SW
Room 509F, HHH Building
Washington, DC 20201