

Notice of Privacy Practices

Effective: June 12, 2007

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.

How is Patient Privacy Protected ?

The George Washington University Medical Faculty Associates (“MFA”) understands that information about you and your health is personal. Because of this, we strive to maintain the confidentiality of your individually identifiable health information, (which includes date of birth, name, social security number, etc), also known as protected health information (“PHI”). We continuously seek to safeguard that information through administrative, physical and technical means, and follow applicable federal and state guidelines.

How do we use and disclose health information?

We may use and disclose your PHI for the normal business activities of treatment, payment and health care operations. However, in some cases we are limited by state law from releasing certain categories of health information. For example,

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disclosures of your mental health information for payment purposes may be limited unless we obtain your written permission prior to the disclosure.

The following are the ways in which we may use and disclose your health information, although not every use or disclosure falling within each category is listed:

Treatment – We keep a record of the treatment that is provided to you. This record may include your test results, diagnoses, medications, and your response to medications or other therapies. We disclose this information so that doctors, nurses, other staff members and entities, such as laboratories, can meet your needs. For example, a physician treating you may confer with another MFA or non-MFA physician or a nursing home about your care.

Payment – We document the services and supplies you receive so we may bill you, your insurance company or another third party for these services and supplies. We may tell your health plan about upcoming treatment or services that require prior approval by your health plan. For example, we may need to give your health plan information about a service provided to you so your health plan will pay us or reimburse you for the service.

Health Care Operations – We use your health information for operational purposes such as to improve the services we provide, to train faculty, staff and students, for business management, quality improvement, and for customer service. For example, we may use your health information to review our treatment and services and to evaluate the performance of our staff in caring for you or we may disclose PHI in the course of training medical students. We may also use certain information (name, address, telephone number, dates of service, age and gender) to contact you in the future for fundraising purposes of the MFA and The George Washington University Medical Center. The money raised will be used to expand and improve the services and programs we provide the community.

Additional Uses and Disclosures

We may also use and disclose your health information to:

- Comply with federal, state or local laws that require disclosure.
- Assist in public health activities such as tracking diseases or medical devices.
- Inform authorities to protect victims of abuse or neglect.
- Comply with Federal and state health oversight activities such as fraud investigations.
- Respond to law enforcement officials or to court orders, subpoenas or other process.
- Recommend treatment alternatives.
- Tell you about health-related products and services.
- Inform coroners, medical examiners and funeral directors of information necessary for them to fulfill their duties.
- Facilitate organ and tissue donation or related procedures.
- Avert a serious threat to health or safety.
- Assist in specialized government functions such as national security, intelligence and protective services.
- Inform military and veteran authorities if you are an armed forces member (active or reserve).
- Inform a correctional institution if you are an inmate.
- Inform workers’ compensation carriers or your employer if you are injured at work.
- Communicate with other covered entities (health care providers, insurance companies) within our organized health care arrangements for treatment, payment, or health care operations.
- Communicate with other providers, health plans, or their related entities for their treatment or payment activities, or

health care operations activities relating to quality assessment or licensing or health care fraud and abuse detection or compliance.

- Provide information to other third parties with whom we do business, such as medical record transcription services. However, you should know that in these situations, we require third parties to provide us with assurances that they will safeguard your information.
- Communicate with individuals involved in your care or payment for that care, such as friends and family, unless you notify us otherwise.
- Contact you by mail, telephone or email, unless we hear from you otherwise, to remind you about your appointments. When contacting you by telephone, we may leave a voicemail message to remind you of your appointment.

We may also contact you via email for other reasons related to the services you receive from MFA. Email communications are not necessarily secure therefore, if you do not want us to communicate with you via email, you must contact us and tell us that. In particular, employers generally retain the right to inspect email communications in the workplace. Therefore, please communicate with us if you have concerns about the receipt of PHI at your workplace email address.

We may also use and disclose your PHI to conduct research following review protocols that ensure the balancing of privacy and research needs. Such protocols will ordinarily be administered by The George Washington University Office of Research. Where judged feasible by that Office, we will seek your written authorization for such research-related use or disclosure.

All other uses and disclosures, not previously described, may only be done with your written authorization. You may revoke your authorization; however, this will not affect prior uses and disclosures.

What are MFA's Responsibilities?

MFA is required by law to:

- Maintain the privacy of your health information
- Provide this notice of our duties and privacy practices
- Abide by the terms of the notice currently in effect

We reserve the right to change privacy practices, and make the new practices effective for all the information we maintain. Revised notices will be posted in our facilities and we will offer you a copy when you receive services.

Do you have any Federal Rights?

The law entitles you to:

- Inspect and copy certain portions of your health information. ♦* This does not include psychotherapy notes and we may deny your request under limited circumstances.
- Request amendment of your health information if you feel the health information is incorrect or incomplete. ♦ (However, under certain circumstances we may deny your request.)
- Receive an accounting of certain disclosures of your health information made after April 14, 2003 although this excludes disclosures for treatment, payment, health care operations. ♦*
- Request that we restrict how we use or disclose your health information. ♦ (However, we are not required to agree with your requests).
- Request that we communicate with you at a specific telephone number or address, or by a specific means, for example by telephone or by mail. ♦
- Obtain a paper copy of this notice even if you receive it electronically.

Requests followed by a diamond (♦) must be in writing. Fees may apply to request followed by a star (). Contact the Patient Advocate if you wish to exercise these rights.*

What if I have a Complaint?

If you believe that your privacy has been violated, you may file a complaint with us or with the Secretary of Health and Human Services in Washington, D.C. We will not retaliate or penalize you for filing a complaint with the Secretary or us. All matters regarding any complaints will remain confidential.

To file a complaint with us or receive more information contact the Patient Advocate at (202) 741-3374.

To file a complaint with the Secretary of Health and Human Services write to 200 Independence Ave., S.W., Washington, D.C. 20201 or call 1-877-696-6775.

Who Will Follow This Notice?

This Notice describes MFA's practices and those of:

- Any physician or other health care professional authorized by MFA to access and/or enter information into your medical record;
- All departments and units of MFA; and
- All affiliates and volunteers.

Need more information?

- Call the Patient Advocate at (202) 741-3374 or write:
Patient Advocate
Medical Faculty Associates
2150 Pennsylvania Avenue, NW, Suite 10-418
Washington, DC 20037