



2001 Butterfield Road, Suite 300  
Downers Grove, IL 60515

## **NOTICE OF PRIVACY PRACTICES**

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

### **Introduction**

This Notice of Privacy Practices is being provided to you on behalf of Vein Clinics of America with respect to vein disorder medical services provided at Vein Clinics of America's network practices (collectively referred to herein as "we," "us," or "our"). We understand that your medical information is private and confidential. Further, we are required by law to maintain the privacy of "protected health information" or "PHI". PHI includes any individually identifiable information that we obtain from you or others that relates to your past, present, or future physical or mental health, the health care you have received, or payment for your health care.

### **Your Rights**

Although your health record is the physical property of Vein Clinics of America, you have the right to, as provided for by applicable law:

- Request a restriction on certain uses and disclosures of your PHI. We are not required to agree to your request for restrictions. However, if you pay for a service entirely out-of-pocket, we will comply with a request that PHI regarding the service be withheld and not provided to a third-party payor for purposes of payment or health care operations. Your request must be made in writing to the address at the end of this notice. You must include what information you want to limit and to whom you want the limitations to apply. We will notify you of our decision regarding the requested restriction. If we do agree to your requested restriction, we will comply with your request unless the information is needed to provide you emergency treatment.
- Obtain a paper copy of this notice of privacy practices upon request.
- Inspect and copy your health record, as provided by Federal regulations. You may request and receive an electronic copy of your PHI if we maintain your PHI in an electronic health record. You must make a request in writing to the address at the end of this notice in order to obtain access to your PHI and obtain a copy request form from us. If you request a copy of your PHI, we may charge a reasonable, cost-based fee in accordance with State law for the costs associated with fulfilling your request. We may deny your request to inspect and copy your PHI in certain limited situations.
- Request to amend your PHI or health record if you feel that health information we have about you is incorrect or incomplete. You have the right to request an amendment for as long as we keep the information. Your request must be made in writing to the address at the end of this notice. You must provide a reason that supports your request for an amendment. We may deny your request for an amendment if it is not in writing or does not include a reason to support the request. In addition, we may deny your request if you ask us to amend information that was not created by us, unless you provide a reasonable basis for us to believe that the person or entity that created the information is no longer available to make the requested amendment; is not part of the health information kept by or for our clinics; is not part of the information which you would be permitted to inspect and copy; or is accurate and complete. Any amendment we make to your PHI or other

health records about you will be disclosed to those with whom we disclose information.

- Obtain an accounting of disclosures of your PHI we have made for purposes other than those listed below in the “Permitted Use and Disclosures” section and certain other disclosures. Your request must be made in writing to the address at the end of this notice and must state a time period, which may not be longer than six years from the date of the request. The first accounting list you request within a 12 month period will be free. For additional lists, we may charge you for the costs of providing the list. We will notify you of the cost involved and you may choose to withdraw or modify your request at that time before any costs are incurred.
- Request communications of your PHI by alternative means or at alternative locations. Your request must be made in writing to the address at the end of this notice and does not need to include the reason for your request. We will accommodate all reasonable requests. Your request must specify how or where you wish to be contacted.
- Revoke your authorization to use or disclose your PHI, except to the extent that action has already been taken in reliance on such authorization.
- Request that we send a copy of your PHI in an electronic format to you or a third party that you identify, if we maintain an electronic health record containing your health information.
- Receive notification if we discover a breach of any of your PHI that is not secured in accordance with Federal guidelines.

## **Our Responsibilities**

We are required to:

- Maintain the privacy of your PHI.
- Provide you with a notice as to our legal duties and privacy practices with respect to PHI we collect and maintain about you.
- Abide by the terms of this Notice of Privacy Practices that is currently in effect.

We reserve the right to change our privacy practices and to make the new provisions effective for all PHI we maintain. Should our privacy practices change, the revised notice will be available upon request, in our clinics, and on our website at [www.veinclinics.com](http://www.veinclinics.com).

We will not use or disclose your PHI without your authorization, except as described in this notice.

## **Permitted Uses and Disclosures of PHI without Authorization**

*We will use your PHI for **treatment**. For example:* Information obtained by a nurse, physician, or other member of your healthcare team will be recorded in your record and used to determine the course of treatment that should work best for you. Your physician will document in your record his expectations of the members of your healthcare team. Members of your healthcare team will then record the actions they took and their observations. In that way the physician will know how you are responding to treatment.

We will also provide your physician or a subsequent healthcare provider with copies of various reports that should assist him/her in treating you once you’re discharged from this practice.

*We will use your PHI for **payment**. For example:* A bill may be sent to you or a third-party payor, such as an insurance company or health plan, for the purposes of receiving payment for treatment and services that you receive. The information on the bill may contain PHI that identifies you, your diagnosis, and treatment or supplies used in the course of treatment.

*We will use your PHI for regular **health operations**. For example:* Members of the clinical staff, the risk or quality improvement manager, or members of the quality improvement team may use PHI in your health record to assess the

care and outcomes in your case and others like it. This information will then be used in an effort to continually improve the quality and effectiveness of the healthcare we provide.

#### **Other Uses or Disclosures of PHI without Authorization**

**Business Associates:** There are some services provided at our network practices through contracts with business associates, including: the management services of Vein Clinics of America, certain laboratory tests, and collection services. When these services are contracted, we may disclose your PHI to our business associate so that they can perform the job we have asked them to do, and bill you or your third-party payor for services rendered. So that your PHI is protected, however, we require the business associate to appropriately safeguard your information.

**Appointments:** We may use or disclose your PHI to call, email, or write you to remind you of a scheduled appointment. We may also email, call, or write to notify you of other treatments or services available at our network practices that might help you. Unless you tell us otherwise, we will call, email, or mail you an appointment reminder.

**Notification:** We may use or disclose PHI to notify or assist in notifying a family member, personal representative, or another person responsible for your care, your location, and general condition.

**Communication with Spouse/Family:** Health professionals, using their best judgment, may disclose to your spouse, family member, or any other person you identify, PHI relevant to that person's involvement in your care or payment related to your care. We will give you an opportunity to object to these disclosures, and we will not make these disclosures if you object.

**Research:** We may disclose PHI to researchers when their research has been approved by an Institutional Review Board that has reviewed the research proposal and established protocols to ensure the privacy of your health information. In most cases, we will de-identify your PHI so that others can use the de-identified information to study health care delivery without learning who you are.

**Marketing:** We may contact you to tell you about or recommend possible treatment alternatives or other venous medical technology and services that may be of interest to you.

**Public Health:** As required by law, your PHI may be used or disclosed for public health activities such as assisting public health authorities or other legal authorities to prevent or control disease, injury, disability, report suspected abuse, neglect, or domestic violence, or to the FDA relative to adverse events with respect to food, supplements, product and product defects or post-marketing surveillance information to enable product recalls, repairs, or replacement.

**Health Oversight Activities:** We may disclose your PHI to a health oversight agency for activities authorized by law such as audits, investigations, inspections, and licensure. These activities are necessary for the government to monitor the health care system, government programs, and compliance with civil rights laws.

**To Avert a Serious Threat to Health or Safety:** We may use and disclose your PHI when necessary to prevent a serious threat to your health and safety or the health and safety of the public or another person. Any disclosure, however, would only be to someone able to help prevent the threat.

**Lawsuits and Disputes:** If you are involved in a lawsuit or a dispute, we may disclose your PHI in response to a court or administrative order. We may also disclose your PHI in response to a subpoena, discovery request, or other lawful process by someone else involved in the dispute, but only if efforts have been made to tell you about the request or to obtain an order protecting the information requested.

**Required by Law and for Law Enforcement:** We may disclose PHI for law enforcement purposes as required by

law, for law enforcement purposes, for national security and intelligence activities, to an appropriate health oversight agency, for workers' compensation purposes, or attorney.

***Military and Veterans:*** If you are a member of the armed forces or separated/discharged from military services, we may release your PHI as required by military command authorities or the Department of Veterans Affairs as may be applicable. We may also release health information about foreign military personnel to the appropriate foreign military authorities.

***Coroners, Health Examiners, and Funeral Directors:*** We may disclose your PHI to a coroner or health examiner. This may be necessary, for example, to identify a deceased person or determine the cause of death. We may also disclose your PHI to funeral directors as necessary to carry out their duties.

**Note: HIV-related information, genetic information, mental health records, and other specially protected information may be subject to certain special confidentiality protections under applicable State and Federal law. Any disclosures of these types of records will be subject to these special protections.**

**For More Information, to Report a Problem/Complaint, or to Make a Written Request**

If you believe your privacy rights have been violated, you should immediately contact:

**Ron Amrich, Senior Vice President of Operations, Vein Clinics of America, Inc.  
2001 Butterfield Road, Suite 300, Downers Grove, Illinois 60515  
Telephone (630) 725-2763.**

We will not take action against you for filing a complaint. You may also file a complaint with the Secretary of Health and Human Services. See information at its website, [www.hhs.gov](http://www.hhs.gov).

If you have any questions, would like further information about this notice, or to make a written request as provided in this notice, please contact Ron Amrich at the above address. This notice is also available on our website at [www.veinclinics.com](http://www.veinclinics.com).

This notice is effective as of January 19, 2015.

**VEIN CLINICS OF AMERICA**  
**NOTICE OF PRIVACY PRACTICES**

This is to acknowledge that I have received a copy of the Notice of Privacy Practices of Vein Clinics of America.

Name: \_\_\_\_\_ Date of Birth: \_\_\_\_\_  
(please print)

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Disposition: File this Acknowledgement Form in the patient's medical record.

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**FOR VEIN CLINICS OF AMERICA USE ONLY:**

**Patient's MRN:** \_\_\_\_\_

**Inability to Obtain Acknowledgement**

To be completed only if no signature is obtained. If it is not possible to obtain the patient's acknowledgement, describe the good faith efforts made to obtain the patient's acknowledgement and the reasons why the acknowledgement was not obtained:

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Signature of Vein Clinics of America representative: \_\_\_\_\_ Date: \_\_\_\_\_

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