



PRIVACY NOTICE.

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.

(Effective Date 4-1-03; current revision 1-7-16)

OUR COMMITMENT TO YOU

FOCUS- Family Options & Community Supports (FOCUS) believes that our most important asset is our consumers' trust. One of the most important responsibilities we have is to maintain your privacy. We are committed to providing quality services to you while keeping your personal information safe and confidential.

FOCUS does not share restricted personal information with anyone outside our organization unless you consent to that sharing. FOCUS manages information within the company using a 'Minimum Necessary' standard. This means that only those employees who need to know about you (to provide and coordinate your services, for example) are allowed access to your information. And even then, they will receive only that information that is necessary to fulfill their mission.

To better serve you, instruction on these standards and procedures is part of every employee's training. Our ongoing commitment to protect our consumers' privacy holds us accountable to you.

OUR COMMITMENT TO PRIVACY

FOCUS has implemented procedures to maintain your privacy, including.

Reasonable Precautions

FOCUS takes reasonable precautions to maintain the integrity of your protected health information. For example, your information is not left out in common areas for every employee to see.

Ongoing Training

FOCUS provides training for its employees on privacy standards and procedures. This includes in-house training as well as instruction from outside experts and professionals.

Privacy Policies

To ensure consistent methods and standards, FOCUS has several privacy policies which identify certain procedures employees implement to protect information.

Privacy Officer

To monitor and enforce Privacy standards and policies, FOCUS employs a Privacy Officer. It is the Privacy Officer's job to take complaints, implement policy, and pursue ever-better Privacy efforts.

HOW WE COLLECT THE INFORMATION

We collect personal information to carry out our mission to provide and coordinate community-based services to you and/or your family.

We receive information from you, such as your name, address, Social Security number, telephone number, Medicaid number, and medical records.

We will likely need to collect information from case managers, social workers, designated insurance carriers/MCOs, and other government agencies as necessary, to coordinate your services.

We may request to gather information from your physicians, educators, employers, and other members of your Interdisciplinary Team, as well.

We will gather this information only with your written consent. You will be given opportunities to express or deny your consent through use of our Release Of Information form. Releases of Information will remain valid for no longer than one year, but may be retracted by you at any time. FOCUS will assume that lack of a

Release indicates your denial of consent.

HOW WE MAY USE INFORMATION ABOUT YOU

For Support

We may disclose information about you to employees of FOCUS who are involved in your support, including Direct Support Staff, and Service Coordinators. This information is used to design service plans, provide training, and accomplish your goals and objectives.

For Treatment

We may disclose information about you to the medical professionals you visit while receiving support hours. For example, we may help you describe the types and amounts of medications you take each day to the physician who is performing your annual physical.

For In-Home Support

Note that some information will be kept temporarily on your home each month, as it is necessary for your in-home support staff to have access to certain protected health information. Such identifiable information as social security numbers, diagnoses, and summaries written by your in-home support staff will be maintained in your Home Book.

For Residential Staffing

We may disclose information about your location and living environment to employees of FOCUS who need to visit your residence to provide services. This information may also be provided to those providing transportation assistance to you and/or employees of FOCUS due to accident, injury or emergency.

For Payment

We may use and disclose information about you so that services may be billed and payment received from Medicaid, private insurance, designated insurance carrier/MCO, etc.

For Quality Assurance

We may use information about you in our internal quality assurance procedures so that services may be improved.

For General Operations

We may use information about you to run our agency. For example, a list of phone numbers may be compiled for the use of our Service Coordinators, allowing them to respond to your calls and pages.

To Ensure your Health and Safety

We may use or disclose information about you when necessary to prevent a serious threat to your health and safety or the health and safety of another person, as allowed by law.

Military and Veterans

If you are a member of the armed forces, we may release information about you as required by military authorities and as allowed by law.

Worker's Compensation

We may release information about you to worker's compensation or similar programs, as allowed by law.

Regulatory Proceedings

We may disclose information about you to an oversight agency authorized by law to audit, investigate, and license our services, as allowed by law.

For Whistleblowers and Workforce member Crime Victims

As required by law, FOCUS may disclose information without having violated confidentiality regulations if a member of the workforce or a business associate discloses protected health information as a whistleblower or as a crime victim, provided certain conditions are met.

Legal Matters

If you or your services are involved in a lawsuit or dispute, we may disclose information about you in response to court or other administrative order, as allowed by law. In such cases, we will make efforts to notify you of the proceedings so that you may obtain an order to legally protect the information. We may release information about you to law enforcement officials coroners, examiners and funeral directors to aid in investigations, as allowed by law.

HOW WE STORE AND TRANSPORT YOUR INFORMATION

We store physical records in our regional and satellite offices in accordance with internal safety protocols and federal and state regulation.. Physical records including protected information are maintained in double locked areas and are accessible only to assigned staff. Electronic records are maintained on encrypted servers and accessible by password protected machines by assigned staff only.

Because our services are often provided in your home, we will transport some of your information between your home and our offices for billing, reporting, and quality assurance purposes. We may transport some of your information between your local FOCUS office and other offices or work locations, as allowed by law.

Precautions will be taken to preserve the integrity of your protected information while it is transported. For example, the monthly paperwork which must flow to and from your house each month will be transported by a designated FOCUS employee who has been trained on policy and procedure.

HOW YOU MAY MANAGE YOUR INFORMATION

The Right to Limit a Release of Information

FOCUS specifies to whom information will be disclosed on the Release of Information form. If you wish to further limit the Release, you may do so in writing on the Request for Change form, available at any FOCUS office.

Submit your request to your service Coordinator, the Director, or the privacy Officer. You may also follow this procedure to limit the method of information exchange; for example, you may specify that information be disclosed only in your presence.

The Right to Inspect your Records

FOCUS keeps most of your information in an Individual Record, available at the FOCUS office. Information may be kept temporarily in the home book, which is usually located in your home. FOCUS maintains billing records in secure office storage. You may request copies of this information from the Director or Privacy Officer by using the Request for Change form, available at any FOCUS office.

The Right to Correct your Information

If the information we have gathered is inaccurate, you may help us correct the mistake by notifying the Director or Privacy Officer by using the Request for Change form, available at any FOCUS office.

The Right to an Accounting of Disclosures

Using the Request for Change form, you may request an account of to whom your information has been disclosed.

The Right to Review FOCUS Privacy Policy and Procedures

FOCUS has several policies which specifically address our goals and objectives concerning privacy. You may review these policies at any time and make suggestions to our procedures by speaking with the Director and the Privacy Officer.

The Right to Appeal a Decision

If you disagree with any decision made by an employee or officer of FOCUS concerning your personal information, you may appeal this decision according to the Grievance Procedure by using the Request for Change form, available at any FOCUS office.

The Right to File a Complaint

You have the right to file a complaint with FOCUS if your privacy rights are violated. To do so, speak directly with the Privacy Officer. She/he will address your concerns immediately. You may also choose to take your complaints to the Secretary of Health and Human Services, or other government agency as you desire. FOCUS will assist with your complaint, as requested.

The Right to Opt Out from Fund Raising

You may choose to restrict your information from any Fund Raising actions taken by FOCUS.

The Right to Freedom from Retaliation

No retaliation against you will be taken for filing a complaint.

The Right to Notification of Breach

If your protected information is known to have been breached and/or otherwise inappropriately disclosed you will be notified of the event and your options for corrective actions.

Filing a Complaint

If you believe your privacy rights have been violated by FOCUS, you may file a complaint with our Privacy Officer. The Privacy Officer is authorized to investigate all allegations of misuse of information, to recommend and pursue solutions to your complaint, and seek sanctions against any employee who has violated your rights. The Privacy Officer will use company policy, HIPPA regulations, and industry standards to resolve privacy disputes. She/he is available at the FOCUS office by telephone or

pager, 24 hours a day. If you choose, you may also file a complaint with the Secretary of Health and Human Services.

CHANGES TO THIS NOTICE

FOCUS may be required to change this Notice in the future. Any revisions may affect the manner in which your information is managed. FOCUS will make efforts to keep all employees and consumers up-to-date on privacy standards. You are also encouraged to keep yourself informed.

ACKNOWLEDGEMENT OF RECEIPT

I acknowledge that I have received the FOCUS Privacy Notice revised 1-7-16. Any questions may be directed to the FOCUS Director or Privacy Officer, Located at the FOCUS office.

NAME OF CONSUMER SERVED BY FOCUS

SIGNATURE OF CONSUMER

DATE

OR

SIGNATURE OF LEGAL REPRESENTATIVE

DATE

Relationship to Consumer

Please return to the FOCUS office as soon as possible. You may mail, fax, or drop the acknowledgement of receipt form off at any time. Thank you.