



Privacy Policy

Patient Information. Patient Rights. UMS' Responsibilities.

This notice describes how medical information about patients may be used and disclosed and how patients can get access to this information. United Medical Systems(UMS) and the Covered Entities(CE) we service are subject to the HIPAA privacy regulations and shall follow the privacy practices described in this notice.

The CE is responsible for all patient PHI and will maintain records in a confidential manner, as required by law. However, the CE may use and disclose PHI to the extent necessary to provide all patients with quality health care. To do this, the CE may share PHI with UMS, as necessary, for treatment, payment and health care operation and for other purposes set forth herein.

This notice only applies to the privacy practices of UMS. The patient's physicians and/or procedure facilities have their own privacy practice notice and are required to provide the patient with a written document. Since an indirect relationship exists with patients, UMS' notice of privacy practice is available upon request and by posting on its website, www.ums-usa.com.

What are Treatment, Payment and Health Care Operations?

Treatment includes sharing information among healthcare providers involved in a patient's care. The facility may share PHI with a UMS employee to ensure that appropriate care is given. The CE may use PHI as required by patient's insurer, to obtain payment for the care given. Patient PHI records may be shared and disclosed to improve the quality of care, e.g. training purposes. PHI may be used unless the patient asks for restrictions on a specific use or disclosure. The CE will inform UMS if any restrictions are initiated by the patient.

How UMS may use or disclose patient PHI

UMS does not need any type of authorization from the patient for the following uses and disclosures:

- Treatment: UMS may use and disclose patient PHI to provide treatment and services
- Payment/Insurance: UMS may use and disclose patient PHI to bill and obtain payment for the services we provide
- For Health Care Operations: UMS may use and disclose patient PHI for our health care operations, which include internal administration and planning and activities that improve the quality and cost effectiveness of the care we deliver
- Appointments: UMS may use and disclose PHI to schedule appointments
- Legal Matters: UMS will give out PHI about a patient when required to do so by federal, state, or local law. UMS may disclose PHI about a patient for public health reasons for the purpose of preventing or controlling disease, injury or disability. UMS may give out PHI to a health oversight agency authorized by law, such as for audits, investigations, inspections, and licensure
- Health or Safety: UMS may use or disclose PHI to prevent or lessen a serious and imminent threat to a person's or the public's health or safety.

- Research: UMS may use or disclose a patient's PHI for medical research if a special review process determines that a patient's privacy is protected.

Use and Disclosures of PHI requiring a patient's written authorization

Except as described above, UMS will not use or disclose patient medical information unless the patient authorizes the CE, in writing, to disclose the following information:

- The CE must obtain a written authorization from the patient for most uses and disclosures of psychotherapy notes (which UMS does not use)
- Uses and disclosures of PHI for marketing purposes
- Disclosures that constitute the sale of PHI

Additionally, other uses and disclosures of PHI not described in this Notice will be made only when the patient gives written permission on an authorization form. A patient may withdraw (revoke) their authorization by sending a written statement to the Privacy Officer.

Patient's Rights regarding PHI

This section explains patient's rights and some of UMS' responsibilities. Requests related to the patient's rights below, must be submitted as a request in a signed, dated letter to the Privacy Officer.

- **Right to Inspect and Copy:** Patients have the right to inspect and obtain a copy of their medical and billing records. Under limited circumstances, UMS may deny access to a portion of their records. UMS may charge a cost based fee, consistent with applicable law, for processing the request.
- **Right to Amend:** If a patient feels that the PHI UMS has is incorrect or incomplete, the patient may ask UMS to amend this information with the reason for the request. UMS may deny the patient's request for amendment if UMS believes the information that would be amended is accurate and complete or other special circumstances apply. If the request is denied, UMS must inform the patient why in writing within 60 days and explain the patient's options.
- **Right to an Accounting of Disclosures:** Patients may request a list of the times UMS has shared their PHI ("accounting of disclosures") for six years prior to the date they asked, which would include who UMS shared it with and why. UMS will provide all the disclosures that the patient requested except for those about treatment, payment and health care operations, those made more than six years prior to the date of request and/or certain other disclosures (such as any the patient asked UMS to make). UMS will give the patient the first listing within any 12-month period free, but will charge the patient a reasonable cost based fee, consistent with applicable law, for all other accountings requested within the same 12 month period.
- **Right to Request Additional Restrictions:** A patient has the right to ask UMS to restrict the uses or disclosures UMS makes of PHI (1) for treatment, payment, or health care operations and (2) to someone who is involved in the patient care or the payment for the care, like a family member or friend. For example, the patient and/or designated family member or friend has the right to request that UMS not disclose PHI to a health plan for payment or health care operations purposes, if that PHI pertains solely to a health care item or service for which UMS has been involved and which has been paid out of pocket in full. Unless otherwise required by law, UMS is required to comply with the request for this type of restriction. For all other requests for restrictions on use and disclosures of a patient's PHI, UMS is not required to agree to a request, but will attempt to accommodate reasonable requests when appropriate. UMS will inform the patient and/or designated family member or friend of the status of their request.
- **Right to Request Confidential Communications:** A patient has the right to request that UMS communicate with a patient in a specific way (for example, home or office phone) or to send mail to a different address. UMS will agree to all reasonable requests.

- Right to a Paper Copy of This Notice: A patient has the right to a paper copy of this Notice even if the patient has agreed to receive this Notice electronically. UMS will provide the patient with a paper copy promptly following a request to the Privacy Officer.
- Complaints: If a patient would like more information about their privacy rights, has concerns that UMS has violated their privacy rights, or if they disagree with a decision that UMS has made about access to their PHI, they may contact UMS Privacy Officer. The patient may also file a written complaint with the Director, Office for Civil Rights of the U.S. Department of Health and Human Services. Upon request, the Privacy Officer will provide the patient with the correct address for the Director. UMS will not retaliate against a patient for filing a complaint.

Changes to this Notice

The effective date of the Notice is on the first page. UMS may change this notice at any time. Any change in the notice could apply to PHI UMS already has about a patient, as well as any information UMS receives in the future. If UMS changes this Notice, UMS will post a copy of the current Notice on their web site, www.ums-usa.com/privacy A patient may also obtain any new Notice by contacting the Privacy Officer.

You may contact the Privacy Officer at:

Privacy Officer
United Medical Systems
1700 West Park Drive, Suite 410
Westborough, MA 01581

If you have any questions about this Notice, you may contact the UMS Privacy Officer by calling 508-870-6565