



Shriners Hospitals
for Children®

Shriners Hospitals for Children®

Notice of Privacy Practices

***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.***

Shriners Hospitals for Children® has written this booklet to explain to you some very important information about the Protected Health Information of our patients and what we do with that information.

IMPORTANT:

For the rest of this booklet we will use short forms of some words. Those words are:

“You” means the patient. If you are the parent or guardian of a patient, please remember we are talking about your child’s health information.

“SHC” or “we” means Shriners Hospitals for Children®. It means not only the hospital that you are at but all of the hospitals that we operate.

“PHI” stands for Protected Health Information. Protected Health Information means information about a person’s health that can be related to that person. For instance, “I know a boy with a broken leg.” is not PHI because the person you’re talking to cannot recognize a particular person. On the other hand, “Sue Smith is seeing Dr. Jones for her broken leg.” is PHI.

Understanding Your Health Record

Each time you visit SHC, a record of your visit is made. SHC will maintain these records for no less than 20 years after your discharge or after your final treatment, or as required by state law. After this time frame, any medical record or personal health information that will no longer be retained will be destroyed in compliance with SHC’s record destruction policy. A copy of SHC’s medical record retention and destruction policy are available upon request.

This record may contain your symptoms, exam and test results, diagnosis, treatment, and a plan for future care or treatment. This information, which we call your health or medical record, serves as:

- A basis for planning your care and treatment.
- A way that the many health professionals who care for you can share information on what each is doing.
- A way that you or a third party can make sure that services were actually provided.
- A tool for teaching health professionals.
- A legal document describing the care you received.
- A source of data for medical research.
- A source of information for public health workers who are trying to improve the health of the nation.
- A tool we can use to improve the care we give and the results we achieve.

Understanding what is in your record and how your health information is used helps you to:

- Make sure it is correct.
- Better understand who, what, when, where, and why others may see your health information.
- Make better decisions about allowing others to see your health record.

Your PHI Rights

Your PHI is kept in your health record (sometimes called your medical record). It includes information about your condition, what treatments you have received, and how you are reacting to those treatments. This record is kept partly on paper and partly in computers. The record itself belongs to SHC, but the PHI in the record belongs to you. You have these rights:

- You can ask us to restrict how PHI is used and when it is disclosed. That means you can ask us not to send it to certain persons or not to send certain parts of the information. We must tell you whether we agree or disagree with your request.
- You can look at your health record and ask to have a copy of it. We may be allowed to charge you for the cost of making the copy.
- You can ask to have corrections made to your health record if you think it is wrong.
- You can have a list of who was given your health information. This list will not include the people who you authorized to receive the information.
- You may ask us to send your PHI to you at another place or by another means.
- If you have given us permission to send your PHI to someone else, you can take back that permission. However, we will not get back any information we have already sent.
- If you want help in understanding any of these rights, you may ask to talk to the Hospital Privacy Manager. If you dial "0" on any hospital phone, the operator can page the Privacy Manager for you.

Our Responsibilities

SHC will do these things:

- Give you this Notice of Privacy Practices.
- Keep your health information private.
- Follow the rules that we have set out in this Notice.
- Let you know if we do not agree to something you ask us to do or not do with your PHI.
- Send your PHI to another place or by another means if it is reasonable for us to do that.

We may change the way we handle PHI. If so, we may apply that change to all SHC PHI even if received prior to that change. If we do make changes, we will prepare a new Notice of Privacy Practices. The new Notice will be posted in the hospital and on our Web site (www.shrinershq.org). Also, if you ask, we will give you a copy of the revised Notice.

Using and Sharing Your PHI

Most of the time, we cannot share your PHI with other people unless you give us written permission to do that. If you want somebody else to see your PHI, you must complete an authorization form before we give that person the information. However, we are allowed to use your PHI and share it with others without your authorization for certain reasons. Those reasons are explained below.

Treatment: In order to provide the most appropriate medical care, we will use your PHI at SHC to treat you. Each person involved in your treatment such as doctors, nurses, physical therapists and others, will write in your medical record to explain what care is being provided. This way, each person taking care of you will know what the others are doing during your course of treatment. We may also share PHI with other doctors or specialists outside of SHC who care for you, so proper medical treatment can be rendered. You must advise us if you do not wish to have your PHI released to any medical professionals who care for you outside of SHC.

Payment: Effective July 1, 2010, SHC will start to bill outside third parties, such as insurance or Medicaid, for services provided at select hospitals. You will be informed if the hospital at which you receive care bills for services. We may also utilize information about your care in order to bill your insurance or Medicare or Medicaid if available, for your treatment at SHC. In addition, patients sometimes need services at another hospital or outside facility. If we send you for those services, we may give that other facility information about your treatment at SHC and your insurance information to help them with their billing process.

Operations: We may use your PHI for healthcare operations. “Healthcare operations” means all of the things the hospital does to improve the quality of care for all patients. For example, someone may look at the records for all the children who had the same operation. They might then compare the information to see similarities and differences. Another part of operations is making sure our employees do their jobs correctly. Managers may need to look at PHI to make sure that your treatment was provided correctly.

Business Associates: Business Associates are people or companies who provide some of the services needed for your care. For instance, some hospitals hire a group of people called a transcription service to type up the notes dictated by the doctors. When they perform the services we request, the Business Associates need to see some of your PHI. However, we require them to keep your information private.

Directory: Unless you tell us not to, we will use your name, room number and general condition in the hospital directory. We can then give this information to people who ask for you by name. We may also give this information, along with your religion, to ministers, priests and other religious leaders.

Notification: We may tell a family member or guardian your location and general condition.

Communication with Family: We will tell your parents or guardian information that would help them to take part in your care. If you want, we may also share this information with other friends or family members.

Subpoena: We may have to share your PHI with a court or attorney if we receive a subpoena or court order. We will try to let you or your attorney know about the subpoena before we send the information.

Research: We may share your PHI with researchers when an Institutional Review Board (IRB) has approved their research project and your condition or treatment is one they want to study. The IRB must first review the plans for the research study and set forth guidelines to make sure the PHI used in the study remains private. The IRB will also decide if a special consent form for the study is needed. In the future, researchers may also look at your medical record to see if your condition or treatment is one that they plan to study. If so, they may ask for your permission to include your information in their study.

Organ donation groups: Sometimes we may share PHI with organ donation groups or other similar groups, such as skin banks.

Training: Many colleges and other schools send students to SHC hospitals as part of their training. These students and their teachers may be able to see your PHI as they learn how to take care of patients.

Medical Care: We may use some of your PHI, including your name and address, to remind you about appointments.

Marketing Activities: We may send you information about other treatments and services that might help you. We may also ask you to let us use your patient story to tell others about SHC.

Fundraising Activities: We may use or disclose a limited amount of medical information to SHC staff in order to contact you about our fundraising efforts. We may also disclose this information to certain Business Associates, who, at our request, will invite you to participate in raising money for SHC. All donations will be used to expand, improve and support SHC's healthcare services, operations, educational programs and research activities. Information on how to stop receiving fundraising materials or requests will be provided on all communications sent from SHC or our Business Associates.

Food and Drug Administration (FDA): The FDA is an agency of the government that keeps track of drugs and medical devices. If anything goes wrong with a drug or medical device we used in your care, we have to send a notice to the FDA and the maker of the drug or device. We will also send in the warranty cards that come with devices. We will use only the least information needed to fill out these forms.

Work and Safety Laws: We may need to give PHI to state and federal health and safety agencies such as workers compensation commissions.

Public Health: We may have to share PHI with public agencies that work to prevent or control disease, injury, or disability.

For example: If a child develops measles or mumps while in our care, we may be required to report that information to the state or local health department.

Record-keeping agencies: We send information about patients' injuries and treatment to private or public agencies that keep track of statistics. For instance, we send information about burn cases to the National Burn Registry and information about spinal cord injuries to the National Trauma Registry. We also may have to share information with agencies that license hospitals or providers.

Law enforcement: We may disclose health information for law enforcement purposes as required by law or in response to a valid subpoena. We may be required, by law, to make PHI available to offices that

1. investigate abuse or neglect or
2. that involve threats to health or safety.

Whistleblowers: If a person who works for us thinks we are breaking the privacy laws, they might tell an attorney or a government agency about their concern.

For More Information or to Report a Problem

If you have questions or would like to know more about these rules, please ask to speak to the Hospital Privacy Manager. If you believe we violated your privacy rights, you can file a complaint with the Hospital Privacy Manager or the Hospital Administrator. You can also call (813) 281-0300 and ask for the Corporate HIPAA Compliance Office or visit SHC's Corporate Compliance website by following the link on SHC's website www.shrinershq.org, or www.shriners.ethicspoint.com or by calling the Hotline at 1-866-290-7637. SHC will try to find out what caused the problem but no one will be upset with you or treat you differently if you complain.

To file a complaint with the Department of Health and Human Services, send your complaint to OCR, 200 Independence Avenue, SW, Humphrey Building, Mail Stop Room 506F, Washington, DC 20201.