



NOTICE OF PRIVACY PRACTICES

THIS INTEGRATED HEALTH 21 NOTICE OF PRIVACY PRACTICES ("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.

Introduction

This Notice applies to the health screening program that is offered by or through your employer or your health plan and to other services provided by Integrated Health 21.

Integrated Health 21 is required by law to maintain the privacy of Protected Health Information ("PHI") and to provide individuals with notice of its legal duties and privacy practices. This Notice explains the following: (1) the uses and disclosures of your PHI which may be made by Integrated Health 21; (2) your individual rights; and (3) Integrated Health 21's legal duties pertaining to your PHI.

Protected Health Information ("PHI") means individually identifiable information created or received by Integrated Health 21 that relates to your past, present, or future physical or mental health or condition, the provision of health care to you, or the past, present, or future payment for the provision of health care to you.

The effective date of this Notice is April 1, 2015. Integrated Health 21 is required to abide by the terms of this Notice which are currently in effect, but reserves the right to change its privacy practices as required or permitted by the HIPAA Privacy Rule or other applicable law. Integrated Health 21 also reserves the right to revise and distribute this Notice whenever there is a material change to the uses or disclosures of PHI, your individual rights pertaining to your PHI, Integrated Health 21's legal duties, or Integrated Health 21's privacy practices.

A. Minimum Necessary and Incidental Uses and Disclosures

Minimum Necessary

Integrated Health 21 has implemented policies and procedures which limit how much PHI is used, disclosed, and requested for certain purposes. These policies and procedures reasonably limit who within Integrated Health 21 has access to PHI, and under what conditions, based on who needs access to perform their job duties for Integrated Health 21. Certain incidental uses and disclosures of PHI are permitted since Integrated Health 21 has reasonable safeguards and minimum necessary policies and procedures to protect your privacy. The minimum necessary standard does not apply to disclosures among health care providers for treatment purposes.

When using or disclosing PHI or when requesting PHI from another entity covered under the HIPAA Privacy Rule, Integrated Health 21 will make reasonable efforts to limit PHI to the *minimum necessary* to accomplish the intended purpose of the use, disclosure, or request unless any of the following apply: (i) the uses, disclosures, or requests are made by a health care provider for treatment; (ii) the uses or disclosures are provided to you as permitted under the HIPAA Privacy Rule; (iii) the disclosures are made pursuant to a valid written authorization; (iv) the disclosures are made to the Secretary of the U.S. Department of Health and Human Services; (v) the uses or disclosures are required by law; or (vi) the uses or disclosures are required for compliance with the HIPAA Privacy Rule.

Incidental Uses and Disclosures Permitted

The HIPAA Privacy Rule permits certain incidental uses and disclosures of PHI which may occur as a by-product of another permissible or required use or disclosure since Integrated Health 21 has in place reasonable safeguards and minimum necessary policies and procedures to protect your privacy. An incidental use or disclosure is a secondary use or disclosure that cannot reasonably be prevented, is limited in nature, and that occurs as a result of another use or disclosure that is permitted by the HIPAA Privacy Rule.

B. Uses & Disclosures of PHI Not Requiring Authorization or Opportunity to Object

Uses and Disclosures for Treatment, Payment and Health Care Operations; Uses and Disclosures Requiring Patient Consent

Integrated Health 21 will use or disclose your PHI for treatment, payment, or health care operations. Disclosures are made to others who are subject to the HIPAA Privacy Rule and who are also involved in your health care or with vendors, agents, or subcontractors with whom we have contracted to assist us in providing health care services.

According to the HIPAA Privacy Rule, the foregoing disclosures may be made after Integrated Health 21 has made good faith efforts to obtain your acknowledgement of receipt of this Notice.

Examples of Uses and Disclosures for Treatment, Payment and Health Care Operations

Treatment, Payment, and Health Care Operations are broadly defined in the HIPAA Privacy Regulations (at 45 CFR § 164. 501). A few examples of how Integrated Health 21 may use your PHI for these purposes are the following:

Treatment: We may use your PHI to give you or your healthcare provider information about alternative medical treatment and programs about health-related products and services that you may be interested in, or that are part of a wellness program. We may also suggest that you participate in a wellness program or a special disease management program for improvement of your health.

Payment: Integrated Health 21 may use or disclose your PHI to bill for the administrative fee for participation in a program.

Health Care Operations: Integrated Health 21 may use or disclose your PHI to identify your needs and contact you concerning wellness education and health coaching. Disclosures may be to third parties which include corporate health management companies, wellness prevention companies' health management companies or for the purposes of licensing, auditing, quality assurance or certification.

Uses and Disclosures Without Acknowledgement, Authorization or Opportunity to Verbally Agree or Object

Integrated Health 21 may also use or disclose your PHI without your consent, authorization or the opportunity to agree or object in the following instances:

- When required by law;
- For public health activities and purposes as authorized by law to collect or receive such information (e.g., public health agency requesting statistics concerning a chronic disease);
- For cases of abuse or neglect (e.g., to a government agency, social service agency, or protective services agency);
- For health oversight activities to a public health authority or other health care oversight agency (which may be public or private) for activities authorized by law (e.g., audit by an agency);
- For judicial and administrative proceedings or in response to an order of a court, administrative tribunal or in response to a subpoena, summons, warranty, discovery request or similar request (e.g., subpoena or court order);
- For a law enforcement purpose to a law enforcement official when required by law;
- To coroners or medical examiners as necessary to help determine a cause of death or to funeral directors as necessary to carry out their duties;
- For workers' compensation purposes (e.g., Integrated Health 21 may need to report information which is relevant to any job-related injuries that by state law are deemed to be involved in workers' compensation coverage);
- For sharing a limited data set with third parties, subject to a data use agreement;
- For specific government requirements or emergencies (e.g., national security and intelligence activities);

- To avert serious threat or safety (e.g., in an emergency);
- When required by the Secretary of the U.S. Department of Health and Human Services to investigate HIPAA compliance;
- When required by military command authorities if you are a member of the armed forces;
- When contacting you about appointment reminders;
- To make a marketing communication to you, if such communication is conducted face-to-face or concerns products or services of nominal value as permitted under the HIPAA Privacy Rule; and
- For other disclosures or for other purposes permitted by the HIPAA Privacy Rule.

Uses and Disclosures to Business Associates

Integrated Health 21 is permitted to disclose your PHI to Business Associates, and to allow Business Associates to receive your health information on Integrated Health 21's behalf so long as Integrated Health 21 has obtained an acknowledgement or proper authorization or as otherwise permitted under the HIPAA Privacy Rule. A Business Associate is defined under the Privacy Regulations as an individual or entity under contract with us to perform or assist us in a function or activity which requires the use of your health information. Examples of business associates include, but are not limited to, consultants, accountants, lawyers, medical transcriptionists and third party billing companies. We require all Business Associates to protect the confidentiality of your health information.

C. Uses and Disclosures Requiring an Opportunity for You to Agree or to Object

Integrated Health 21 may use or disclose PHI under certain circumstances, provided that you are informed in advance of the use and disclosure of PHI and you have the opportunity to agree to or prohibit or restrict the use or disclosure of PHI. Integrated Health 21 may orally inform you of and obtain your oral agreement or objection to a use or disclosure of PHI.

If you are present or otherwise available prior to use or disclosure of PHI

Integrated Health 21 may use or disclose PHI to notify a family member, other relative, or a close personal friend of you, or any other person identified by you, your PHI directly relevant to such person's involvement with your care or payment related to your health care if Integrated Health 21 obtains your agreement; provides you with the opportunity to object to the disclosure, and you do not express an objection; or reasonably infers from the circumstances, based upon the exercise of professional judgment, that you do not object to the disclosure of PHI.

If you are not present or otherwise not available prior to use or disclosure of PHI

If you are not present or if the opportunity to agree or object to the use or disclosure of PHI cannot be accomplished because of your incapacity or because of an emergency circumstance, then Integrated Health 21 may, in the exercise of professional judgment, determine whether the disclosure is in your best interests and, if so, disclose only your PHI that is directly relevant to the person's involvement with your health care.

Disaster relief

Integrated Health 21 may also use or disclose PHI to a public or private entity authorized by law or by its policies to assist in disaster relief efforts with your authorization, if you are present or otherwise available, or without your authorization if you are not available prior to the use or disclosure.

Notification of location, general condition, or death to person responsible for your care

Integrated Health 21 may use or disclose your PHI to notify or assist the notification of (including identifying or locating) a family member, your personal representative, or another person responsible for your care with regard to your location, general condition, or death using the above-referenced guidelines (presented above with italicized headings) with your authorization, if you are present or otherwise available, or without your authorization if you are not available prior to the use or disclosure.

D. Uses and Disclosures Requiring Written Authorization

All uses and disclosures of your PHI not covered by this Notice will be made only with your written authorization, such as sharing your health screening information obtained by Integrated Health 21 with certain third parties. According to the HIPAA Privacy Rule, Integrated Health 21 is required to obtain your authorization for (a) most uses and disclosures of psychotherapy notes, (b) most uses and disclosures for marketing purposes (as defined under the HIPAA Privacy Rule) unless an exception exists, and (c) for disclosures that constitute a sale of PHI under the HIPAA Privacy Rule.

If you give Integrated Health 21 written authorization to use or disclose your PHI for a purpose that is not described in this Notice, then you may revoke it in writing at any time unless: (1) Integrated Health 21 has taken action in reliance on your authorization; or (2) the authorization was obtained as a condition of obtaining insurance coverage and other law provides the insurer with the right to contest a claim under the policy or the policy itself provides for such a right. Your revocation will not have any effect on uses or disclosures made prior to Integrated Health 21's receipt of the revocation.

Fundraising Activities

You have the right to opt out of fundraising communications. You can do so in writing by contacting Integrated Health 21's Privacy Officer at the address set forth herein or by calling Integrated Health 21 at (412) 481-1644. Such communication must include your instructions to opt out of fundraising communications. Unless you opt out, Integrated Health 21 may decide (through itself or a third party) to contact you for fundraising purposes as permitted under the HIPAA Privacy Rule.

E. Your Rights

Right to Request Restrictions

You may request restrictions on Integrated Health 21's uses and disclosures of your PHI to carry out treatment, payment or health care operations or to restrict uses and disclosures to those who are involved in your care or payment for your care. However, Integrated Health 21 cannot restrict the use or disclosure of PHI for any emergency treatment that you might need or any other disclosures not requiring your authorization. Integrated Health 21 will respond in writing to your request to restrict your PHI. If we disagree with your request to restrict PHI, then we will explain the reasons for denying your request. Please know that Integrated Health 21 is generally not required to agree with your request to restrict PHI unless you pay out of pocket in full for a particular healthcare item or service, in which case you have the right to restrict certain disclosures of your health information, related solely to such item or service, to your health plan for payment or health care operations.

Please note: Even if a restriction is agreed to by Integrated Health 21, it is not effective to prevent uses or disclosures permitted or required such as by the Secretary of the U.S. Department of Health and Human Services to investigate or determine compliance of Integrated Health 21 with HIPAA or when an authorization or opportunity to agree or object is *not* required.

Right to Receive Confidential Communications

You have the right to request that Integrated Health 21 communicate your PHI to you through alternate means (e.g., alternate address or mode of communication). Integrated Health 21 will accommodate reasonable requests from you to receive communications of PHI from Integrated Health 21 by alternative means or at alternative locations.

Electronic communications such as e-mail and facsimile are not completely secure. Integrated Health 21 is not responsible for incorrect e-mail addresses or facsimile numbers.

Right to Access Your PHI

You generally have the right of access to inspect and obtain a copy of your PHI which Integrated Health 21 collects or maintains in its files.

Providing access to PHI if the request is granted: Integrated Health 21 will provide the access requested, including inspection or obtaining a copy of your PHI. Integrated Health 21 will provide you with access to your PHI in the form or format requested if feasible, in a readable hardcopy form, or another form as agreed by Integrated Health 21 and you.

Integrated Health 21 may provide you with a *summary* of your PHI in lieu of providing access to your PHI or may provide an explanation of your PHI if you agree in advance to such summary or explanation and you agree in advance to the fees imposed, if any, by Integrated Health 21 for such summary or explanation.

Integrated Health 21 will provide you with access to your PHI within thirty (30) days after receipt of the request if your PHI is maintained on site or within sixty (60) days if maintained off-site. Integrated Health 21 will arrange with you a convenient time and place to inspect or obtain a copy or otherwise mail you a copy of your PHI at your request. Integrated Health 21 may charge you for the cost of copying the materials and any postage involving your requested PHI. Integrated Health 21 may discuss with you the scope, format, and other aspects of your request as necessary to process your request.

Integrated Health 21 will not provide you access, however, to certain PHI, namely, psychotherapy notes, information compiled for use in civil, criminal, or administrative proceedings, and health information that is covered by federal laws governing clinical laboratories.

Legal duties of Integrated Health 21 for denial of access to PHI: If Integrated Health 21 denies access to PHI, in whole or in part, then, Integrated Health 21 will do the following:

- Make other PHI that was requested accessible to the extent possible;
- Provide a timely, written denial to you within thirty (30) days after receipt of the request if your PHI is maintained on-site or within sixty (60) days if maintained off-site. But, if Integrated Health 21 is unable to comply with this time frame, then Integrated Health 21 may extend the time for thirty (30) days from the initial time period. However, in such a case, Integrated Health 21 will provide you with a written statement of the reasons for the delay and the date by which Integrated Health 21 will complete its action on the request within the initial time period.
- The denial will be written in plain language and will include the basis for the denial. If the denial is reviewable, then the denial will provide a statement of your rights to have the denial reviewed and include a description of how you may complain to Integrated Health 21 either through its procedures or the procedures as designated by the Secretary of the U.S. Department of Health and Human Services. The denial will also provide the name, or title, and telephone number or office, where applicable.

Other duties of ICH regarding access to PHI: If Integrated Health 21 does not maintain your PHI that is the subject of your request for access and Integrated Health 21 knows where the requested PHI is maintained, then Integrated Health 21 will inform you of where to direct the request for access to your PHI.

Reviewable grounds for denial of access to PHI: Integrated Health 21 may deny you access for any of the following reasons; however, you will have the right to have the denial reviewed in the following instances:

- A licensed health care professional has determined, in the exercise of professional judgment, that the access requested is reasonably likely to endanger the life or physical safety of yourself or another person;
- Your PHI makes reference to another person (unless such other person is a health care provider) and a licensed health care professional has determined, in the exercise of professional judgment, that the access requested is reasonably likely to cause substantial harm to such other person; or
- The request for access is made by your personal representative and a licensed health care professional has determined, in the exercise of professional judgment, that the provision of access to such personal representative is reasonably likely to cause substantial harm to you or another person.

Review of denial regarding access to PHI: If your request is denied *and the grounds for denial are reviewable*, then you have the right to have the denial reviewed by a licensed health care professional who is designated by Integrated Health 21 to act as a reviewing official and who did not participate in the original decision to deny access to your PHI. Integrated Health 21 will provide you with instructions for requesting a review of the denial (if the grounds are reviewable). Integrated Health 21 will either provide access *or* deny access in accordance with the determination of the reviewing official.

Right to Amend PHI

You have the right to request that Integrated Health 21 amend your PHI or a record about you so long as Integrated Health 21 maintains your PHI in the designated record set. Any request must be made *in writing* and you must provide a reason to support a requested amendment. Integrated Health 21 will act on your request within sixty (60) days after the receipt of such a request. If it cannot comply with the request within the initial sixty (60) days, then it may extend the time for an additional thirty (30) days provided that Integrated Health 21 has informed you in writing of the reasons for the delay and the date by which Integrated Health 21 will act on your request. Integrated Health 21 may grant or deny your request to amend your PHI.

Grant of the amendment: If Integrated Health 21 grants your request to amend your PHI, then, it will obtain from you an identification of relevant persons (or entities) with whom the amendment needs to be shared. Integrated Health 21 will also make the appropriate amendment to your PHI or record that is the subject of the request for amendment by, at minimum, identifying the records in the designated record set that are affected by the amendment and appending or otherwise providing a link to the location of the amendment.

Denial of the amendment: If Integrated Health 21 denies your request to amend your PHI, then the denial will be written in plain language and contain the basis for the denial. The denial will include a description of your right to disagree with denial and how you may submit a statement of disagreement for inclusion in the record. Integrated Health 21 may prepare a written rebuttal to your statement of disagreement and provide you with a copy.

However, if you choose not to submit a statement of disagreement, then you may request that Integrated Health 21 provide your request for amendment and the denial with any future disclosure of your PHI that is subject to the amendment.

Right to Receive an Accounting of PHI Disclosures:

You have the right to request an accounting of disclosures of PHI made by Integrated Health 21 in the six (6) years prior to the date of your request *except disclosures made in the following instances* (unless otherwise required by law):

- To carry out treatment, payment and health care operations;
- To you about your own PHI;
- Incident to a permitted or required use or disclosure;

- Pursuant to an authorization;
- To persons involved in your care or for other notification purposes;
- For national security or intelligence purposes;
- Occurred prior to the compliance date for Integrated Health 21;
- To correctional institutions or law enforcement officials in custodial situations; or
- Permitted under the HIPAA Privacy Rule.

Suspension of individual right to receive an accounting of certain disclosures which are made to a health oversight agency or law enforcement officials: Integrated Health 21 will suspend your individual right to receive an accounting of certain disclosures to a health oversight agency or law enforcement official if the agency or official provides ICH with a written statement that the accounting would be reasonably likely to impede the agency's activities and specifies a time for which the suspension requires.

However, if the agency or official statement as described above is made orally, then Integrated Health 21 will: (1) document the statement, including the identity of the agency or official making the statement; (2) temporarily suspend your right to an accounting of disclosures subject to the statement; and (3) limit the temporary suspension to no longer than thirty (30) days from the date of the oral statement, unless a written statement as described above is submitted during that time.

When accounting will be provided: Integrated Health 21 generally will act on the request for an accounting no later than sixty (60) days after receipt. However, if Integrated Health 21 cannot act on the request within this period of time, it will send you a written explanation of why it cannot act on the request within the timeframe and also the date by which it will act on the request.

Fees that may be charged for an accounting: Integrated Health 21 will provide the *first* accounting to you in any twelve (12) month period without charge. However, Integrated Health 21 may impose a reasonable, cost-based fee for each subsequent request for an accounting by you within the twelve (12) month period, provided that Integrated Health 21 has informed you in advance of the fee and provides you with an opportunity to withdraw or modify the request for a subsequent accounting in order to avoid or otherwise reduce the fee.

Right to Copy of Notice:

You have the right to obtain a copy of this Notice upon request even if you agreed to receive the Notice electronically.

Procedure for Exercising Your Rights:

If you want to exercise any of the rights described in this Notice, please contact the Privacy Officer using the contact information listed below. The Privacy Officer will give you the necessary information and forms for you to complete and return. In some cases, you may be charged a cost-based fee to carry out your request.

A Note Regarding Your Personal Representative:

Your rights may be exercised by a person who qualifies as your personal representative in accordance with 45 CFR 164.502(g). If under applicable law a person has authority to act on behalf of an individual who is an adult or an emancipated minor in making decisions related to health care, Integrated Health 21 will treat such person as a personal representative with respect to PHI relevant to such personal representation.

Exceptions may apply in certain circumstances involving minor children and in cases involving suspected domestic violence, abuse or neglect by the personal representative such as when Integrated Health 21 has a reasonable belief that the individual has been or may be subjected to domestic violence, abuse, or neglect by such person or treating such person as the personal representative could endanger the individual and Integrated Health 21, in the exercise of

professional judgment, decides that it is not in the best interest of the individual to treat the person as the individual's personal representative.

Deceased Individuals:

Integrated Health 21 must comply with the HIPAA Privacy Rule with regard to the PHI of deceased individuals for a period of 50 years following the date of death. Integrated Health 21 may disclose a deceased individual's PHI to family members or others who were involved in their care or payment for care prior to death unless doing so is inconsistent with any prior express preference of the individual which is known to Integrated Health 21.

Marketing:

The following communications are not considered marketing and therefore are permitted to be made by Integrated Health 21 or a Business Associate under the HIPAA Privacy Rule without your authorization:

- Communication made to describe a health-related product or service (or payment for such product or service) that is provided by, or included in a plan of benefits of, the covered entity making the communication (this includes only communications about Integrated Health 21's own products and services);
- Communication made for treatment of an individual;
- Communication made for case management or care coordination, or to direct or recommend alternative treatments, therapies, health care providers, or settings of care.

Notification in case of breach:

In the case of a breach of unsecured PHI which Integrated Health 21 accesses, maintains, retains, modifies, records, stores, destroys, or otherwise holds, uses, or discloses, Integrated Health 21 will notify each individual whose unsecured PHI has been, or is reasonably believed by Integrated Health 21 to have been, accessed, acquired, or disclosed as a result of such breach in accordance with federal regulations.

Unsecured protected health information is defined as PHI that is *not* secured by a technology standard that renders PHI unusable, unreadable, or indecipherable to unauthorized individuals and is developed or endorsed by a standards developing organization that is accredited by the American National Standards Institute or as the Secretary of the U.S. Department of Health and Human Services may define it to be.

F. Complaints and Additional Information

If you believe your privacy rights have been violated by Integrated Health 21, you have the right to file a complaint with Integrated Health 21's Privacy Officer or the Secretary of the U.S. Department of Health and Human Services. You will not be retaliated against you if you choose to file a complaint with Integrated Health 21 or with the U.S. Department of Health and Human Services. You may also contact ICH's Privacy Officer to request additional copies of this Notice or to receive more information about the matters covered by this Notice, and to review a denial of access of PHI.

Contacting the Privacy Officer.

Integrated Health 21
Attn: Privacy Officer
2403 Sidney Street, Suite 220B
Pittsburgh PA 15203

Contacting Health and Human Services.

If you wish to file a complaint, you may do so by either sending the complaint to the appropriate Office of Civil Rights Regional office or Office of Civil headquarters; alternatively, you may file a complaint online at the www.hhs.gov website.

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