



CEDARS-SINAI®

JOINT NOTICE OF PRIVACY PRACTICES OF CEDARS-SINAI MEDICAL CENTER AND CEDARS-SINAI MEDICAL CARE FOUNDATION

Effective Date: September 23, 2013

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

WHAT IS THIS NOTICE AND WHO WILL FOLLOW IT

Cedars-Sinai understands that information about you and your health is confidential. We are committed to protecting the privacy of this information. We use and share your health information only as permitted by federal and state laws.

We are required by law to maintain the privacy of your protected health information, to provide you with this Notice of our legal duties and privacy practices with respect to your health information, to notify affected individuals following a breach of unsecured protected health information, and to follow the terms of the Notice currently in effect.

This Notice describes the privacy practices of Cedars-Sinai Health System, including Cedars-Sinai Medical Center¹ ("the Hospital") and Cedars-Sinai Medical Foundation and its affiliated physicians and medical groups ("the Foundation"), and that of all Cedars-Sinai facilities, offices, and personnel, including non-employees such as volunteers, who have a need to use your health information to perform their job, and physicians and allied health professionals while they are caring for you in Cedars-Sinai facilities and offices.

In addition, these entities may share health information with each other for treatment, payment, or health care operations purposes as described in this Notice. This Notice applies to all of the records of your care generated at Cedars-Sinai, whether made by Cedars-Sinai personnel or your personal doctor when caring for you in the Hospital or Foundation. Your personal doctor may have different policies regarding his or her use and disclosure of your health information.

HOW WE MAY USE AND DISCLOSE YOUR HEALTH INFORMATION

The following categories are different ways that we may use and disclose health information. Not every possible use or disclosure in a category is described below.

Treatment. We may use and share health information about you to provide, coordinate, or manage your medical treatment and related services.

¹ All departments, units, and programs of the Hospital except the Voluntary Blood Donor Program and Research Institute (except clinical research-related activities involving protected health information).

We may share health information about you with doctors, nurses, technicians, students in health care training programs, or other personnel who are involved in taking care of you. For example, a doctor treating you for a broken leg may need to know if you have diabetes because diabetes might slow the healing process. Additionally, different departments of Cedars-Sinai may share health information about you in order to coordinate the services you need, such as prescriptions, lab work, and x-rays. We may also disclose your health information to health care providers outside of Cedars-Sinai for the purpose of coordinating your care.

Payment. We may use or disclose your information to obtain payment for services provided to you. For example, we may disclose information to your health insurance company or other payer to obtain preauthorization or payment for treatment.

Health Care Operations. We may use and disclose information about you for the purpose of our business operations. These business uses and disclosures are necessary to make sure that our patients receive quality care and cost effective services. For example, we may use medical information to review our treatment and services and to evaluate the performance of our staff in caring for you. We may also combine medical information about many Cedars-Sinai patients to decide what additional services Cedars-Sinai should offer, what services are not needed, and whether certain new treatments are effective.

Business Associates. Some of our functions are accomplished by individuals or companies with whom we contract, called “business associates,” to perform certain specialized work for us. We may disclose your health information to our business associates so they can perform the tasks we have asked them to do.

Electronic Records. Currently, some or all of your health information may be stored in an electronic format. When permissible for valid purposes (e.g., providing treatment or billing for services), your health care providers may access your health information from their offices or other locations outside of Cedars-Sinai facilities. Additionally, Cedars-Sinai may provide access for certain affiliated physicians or other health care providers to store your health information that they create outside of Cedars-Sinai in Cedars-Sinai’s electronic systems. All access to your health information will be permitted only in a manner consistent with applicable law.

Other Uses or Disclosures. We may also use or disclose your information for certain other purposes allowed by applicable state or federal laws and regulations, including the following:

- For public health activities such as reporting communicable diseases, reactions to medications, problems with products or other adverse events, or for vital statistics such as reporting a baby’s birth.
- As required by state or federal law such as reporting abuse, neglect, or certain other events.
- For certain health oversight activities such as audits, investigations, or licensure actions.
- If you are involved in a lawsuit or a dispute, we may disclose medical information about you in response to a court or administrative order. We may also disclose medical information about you 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 (which may include written notice to you) or to obtain an order protecting the information requested.

- When requested by law enforcement, but only as authorized by law, such as to identify or locate a suspect, fugitive, material witness, or missing person.
- To coroners, medical examiners, funeral directors, or organ procurement organizations as necessary to allow them to carry out their duties.
- For research purposes if certain conditions are satisfied. All research projects are subject to a special approval process that evaluates a proposed research project and its use of health information to ensure appropriate safeguards. Before we use or disclose medical information for research, the project will have been approved through this research approval process, but we may, however, disclose medical information about you to people preparing to conduct a research project, for example, to help them look for patients with specific medical needs, as long as the medical information they review does not leave Cedars-Sinai. If you do not want to participate in research efforts, you may notify us using the contact information provided later in this Notice.
- To avoid a serious threat to your health or safety or the health or safety of others.
- As allowed by workers compensation laws for use in workers compensation programs.
- If you are a member of the armed forces, we may release medical information about you as required by military command authorities. We may also release medical information about foreign military personnel to the appropriate foreign military authority.
- For certain specialized government functions such as intelligence and national security activities.
- We may disclose medical information about you to authorized federal officials so they may provide protection to the President, other authorized persons, or foreign heads of state or conduct special investigations.
- If you are an inmate of a correctional institution or under the custody of a law enforcement official, we may disclose medical information about you to the correctional institution or law enforcement official. This disclosure would be necessary 1) for the institution to provide you with health care; 2) to protect your health and safety or the health and safety of others; or 3) for the safety and security of the correctional institution.
- We may disclose health information to a multidisciplinary personnel team relevant to the prevention, identification, management, or treatment of an abused child and the child's parents, or elder abuse and neglect.
- In some circumstances, your health information may be subject to restrictions that may limit or preclude some uses or disclosures described in this Notice. For example, there are special restrictions on the use or disclosure of certain categories of information — e.g., tests for HIV or treatment for mental health conditions or alcohol and drug abuse. Government health benefit programs, such as Medi-Cal, may also limit the disclosure of beneficiary information for purposes unrelated to the program.

Disclosures We May Make Unless You Object. Unless you instruct us otherwise, we may disclose your information as described below:

- To a member of your family, relative, friend, or other person who is involved in your health care or payment for your health care. We will limit the disclosure to the information relevant to that person's involvement in your health care or payment. In addition, we may disclose health information about you to an entity assisting in a disaster relief effort so that your family can be notified about your condition, status, and location.
- To maintain our facility directory. If a person asks for you by name, we will only disclose your name, general condition (e.g., serious, fair, good, etc.), and location in our facility. The facility

directory allows the Hospital to help visitors find your room or talk to you by phone and generally know how you are doing.

- To contact you to raise funds for Cedars-Sinai programs and operations. You may opt out of receiving such communications at any time by contacting Cedars-Sinai Community Relations and Development at (323) 866-6899.

Uses and Disclosures With Your Written Authorization. Other uses and disclosures not described in this Notice will be made only with your written authorization, including most uses or disclosures of psychotherapy notes; for most marketing purposes; or if we seek to sell your identifiable health information. You may revoke your authorization by submitting a written notice to the applicable health information representative or privacy contact using the contact information provided later in this Notice. The revocation will not be effective to the extent we have already taken action in reliance on the authorization.

Your Rights Concerning Your Protected Health Information. You have the following rights concerning your health information. To exercise the rights in this section, except for requesting a copy of this Notice, you must submit a written request. You may obtain additional information and instructions for exercising these rights by contacting the health information representative where services were provided:

CEDARS-SINAI MEDICAL CENTER - Release of Information, Health Information Department, 8700 Beverly Blvd, Room 2901, Los Angeles, CA 90048 (310) 423-2259

CEDARS-SINAI MEDICAL CARE FOUNDATION - Director, Health Information Management, 8501 Wilshire Blvd, Suite 244, Beverly Hills, CA 90210 (310) 248-7058

- **Request additional restrictions on the use or disclosure of information for treatment, payment, or health care operations.** We are *not* required to agree to the requested restriction except in the limited situation in which you request we not send information about a health care service or related item to your health plan for the purposes of payment or health care operations if you or someone else pays in full for that service or item at the time of the request and if you notify us in advance (so we do not automatically bill your health plan).
- **Request that we contact you in a certain way or at a certain location.** For example, you may ask that we contact you at a work phone number or address. We will accommodate all requests that are reasonable for our system capabilities.
- **Inspect and obtain a copy of records that are used to make decisions about your care or payment for your care** (including an electronic copy if we maintain the records electronically). We may charge you a reasonable cost-based fee for providing the records. We may deny your request to inspect and copy in certain very limited circumstances. If you are denied access to medical information, you may request that the denial be reviewed. Another licensed health care professional chosen by Cedars-Sinai will review your request and the denial. The person conducting the review will not be the person who denied your request. We will comply with the outcome of the review.
- **Request that your protected health information be amended.** 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 the person or entity that created the information is no longer available to make the amendment;
- Is not part of the medical information kept by or for the entity receiving the amendment request;
- Is not part of the information which you would be permitted to inspect and copy; or
- Is accurate and complete.

Even if we deny your request for amendment, you have the right to submit a written addendum, not to exceed 250 words, with respect to any item or statement in your record you believe is incomplete or incorrect. If you clearly indicate in writing that you want the addendum to be made part of your medical record we will attach it to your records and include it whenever we make a disclosure of the item or statement you believe to be incomplete or incorrect.

- **Request an accounting of certain disclosures we have made of your protected health information.** The accounting will provide information about disclosures made outside of Cedars-Sinai for purposes other than treatment, payment, health care operations, disclosures excluded by law, or those you have authorized. The first 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 a paper copy of this Notice**, even if you agree to receive it electronically.

Changes To This Notice. We reserve the right to change our Notice of Privacy Practices from time to time, and to make the new Notice effective for all protected health information that we maintain. If we make a material change to our Notice, we will post the revised Notice in our facilities and offices and on our website. You may obtain a copy of the current Notice by accessing our website at www.cedars-sinai.edu or contacting us as indicated below.

Complaints. You may complain to us or to the Secretary of the U.S. Department of Health and Human Services if you believe your privacy rights have been violated. You may file a complaint with us by notifying us as set forth below. All complaints must be made in writing. We will not retaliate against you for filing a complaint.

Privacy Contact Information. If you have any questions about this Notice, wish to request a copy of the current Notice, or if you want to file a privacy complaint, please contact the Medical Center or Foundation as applicable at:

CEDARS-SINAI MEDICAL CENTER - Privacy Manager, Corporate Integrity Program, 8700 Beverly Blvd, Los Angeles, CA 90048 (323) 866-7877

CEDARS-SINAI MEDICAL CARE FOUNDATION - Privacy Officer, 8501 Wilshire Blvd, Suite 244, Beverly Hills, CA 90211 (310) 385-3425