

LIVE BETTER AT HOME

A PROGRAM OF MASONIC PATHWAYS

NOTICE OF PRIVACY INFORMATION PRACTICES

Effective date: 6/28/13

**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.**

Please contact the Masonic Pathways Privacy Officer at (989) 463-3141, if you have any questions regarding this notice.

A. General description and purpose of notice.

This notice describes Live Better At Home's information privacy practices and that of:

1. Any health care or other professional authorized to enter information into your medical/member record created and/or maintained at our organization;
2. Any member of a volunteer group which we allow to help you while receiving services through our organization; and
3. All employees, staff, and other personnel of Live Better At Home.

All of the individuals or entities identified above will follow the terms of this notice. These individuals or entities may share your health information with each other for purposes of treatment, payment, or health care operations, as further described in this notice.

Live Better At Home values our relationship with you, and we take your personal privacy seriously. Information collected, maintained and utilized by Live Better At Home including information entered on the website is kept confidential and fully secured.

Please be aware that links to other websites may be available to provide you with additional useful information and services. Links that take you off the Live Better At Home website are clearly labeled. Live Better At Home is not responsible for the privacy policies or actions of those who control other websites. We encourage you to look for and review the privacy policies of any website you visit.

Live Better at Home may also partner with third parties and provide links to their websites to offer you additional information and services. You may see both the Live Better At Home logo and the third party's logo on these third-party websites. Users of these websites should be aware of who is collecting personal information and which entities Privacy Statement applies before providing personal information. Live Better At Home may not have control over third-party partners' use of your information.

B. Live Better At Home's policy regarding your health information.

We are committed to preserving the privacy and confidentiality of your health information created and/or maintained at our organization. Certain state and federal laws and regulations require us to implement policies and procedures to safeguard the privacy of your health information.

Users of the Live Better At Home website have the option to

provide certain personal information including health information. This information may be required in order to receive specific services. By providing such information, you are agreeing that Live Better At Home may store, process, and review such information, and we may use this personal information for the purpose for which it was collected.

This notice will provide you with information regarding our privacy practices and applies to all of your health information created and/or maintained at our organization, including any information that we receive from other health care providers or organizations. The notice describes the ways in which we may use or disclose your health information and also describes your rights and our obligations regarding any such uses or disclosures. We will abide by the terms of this notice, including any future revisions that we may make to the notice as required or authorized by law.

We reserve the right to change this notice and to make the revised or changed notice effective for health information we already have about you as well as any information we receive in the future. We will post a copy of the current notice on the Live Better At Home webpage. The first page of the notice contains the effective date and any dates of revision.

C. Uses or disclosures of your health information.

We may use or disclose your health information in any of the following ways:

1. Pursuant to your receipt of this notice for purposes of treatment, payment or health care operations.
2. Pursuant to your written authorization for purposes other than treatment, payment or health care operations.
3. Pursuant to your receipt of this notice to discuss your health condition with family or friends who you designate.
4. As permitted by law.
5. As required by law.

The following describes each of the different ways that we may use or disclose your health information. Where appropriate, we have included examples of the different types of uses or disclosures. While not every use or disclosure is listed, we have included all of the ways in which we may make such uses or disclosures.

1. Uses or disclosures made pursuant to your receipt of this notice.

We may use or disclose your health information for purposes of treatment, payment, or health care operations pursuant to you receiving this notice.

a. Treatment. We may use or disclose your health information for purposes of contacting you to inform you of health-related benefits and services that may be of interest to you.

b. Payment. We may use the personal/health information you submit so that we may bill and collect payment from you.

c. Health care operations. We may use or disclose your personal/health information to perform certain functions within our organization. These uses or disclosures are necessary to operate our organization and to make sure that our members receive quality care. For example, we may use your information to review our services and to evaluate the performance of our staff in caring for you. We may combine personal/ health information about many of our members to determine whether certain services are effective or whether additional services should be provided. We also may combine health information with information from other health care organizations to compare how we are doing and see where we can make improvements in the care and services offered to our

members. We may remove information that identifies you from this set of health information so that others may use the information to study health care and health care delivery without learning the specific identities of our members.

d. Fundraising activities. We may use a limited amount of your personal/health information for purposes of contacting you to raise money for our organization and its operations. We may disclose this personal/health information to a foundation related to the facility so that the foundation may contact you to raise money for our organization. The information which we may use or disclose will be limited to your name, address, phone number, and dates for which you received services from our organization. *If you do not want our organization or affiliated foundation to contact you for these fundraising purposes, you must notify the Masonic Pathways Privacy Officer in writing.* We will not sell, trade, rent, or disclose your information to any third party not affiliated with our organization unless required to do so by law.

2. Uses or disclosures made pursuant to your written authorization.

We may use or disclose your personal/health information pursuant to your written authorization for purposes other than treatment, payment or health care operations and for purposes that are not permitted or required law. You have the right to revoke a written authorization at any time as long as your revocation is provided to us in writing. If you revoke your written authorization, we will no longer use or disclose your health information for the purposes identified in the authorization. You understand that we are unable to retrieve any disclosures that we may have made pursuant to your authorization prior to its revocation. Examples of uses or disclosures that may require your written authorization include the following:

- a. A request to provide certain personal/health information to a pharmaceutical company for purposes of marketing.
- b. A request to provide your personal/health information to an attorney for use in a civil litigation claim.
- c. A request to provide your personal/health information for purposes of including you on a mailing list.
- d. Use of your health/personal information and photograph on the Live Better At Home website or external publications, including television, radio, for the purpose of assisting Live Better At Home in their marketing and communication efforts.

3. Other uses or disclosures made pursuant to your receipt of this agreement.

a. We may use the voluntarily provided health/personal information to notify website users/members of updates, products, services, or upcoming events. Website users who do not wish to receive such notifications via e-mail can choose to opt out of receiving such information. It is our policy that e-mail messages will contain an “unsubscribe” feature, along with instructions on how to execute the unsubscribe function. Registered website users can opt out of receiving e-mail messages by updating their communications preferences within the secured portion of the Live Better At Home website.

b. Individuals involved in your care. We may disclose your health information to individuals, such as family and friends, who are involved in your care or who help pay for your care. We also may disclose your health information to a person or organization assisting in disaster relief efforts for the purpose of notifying your family or friends involved in your care about your condition, status and location.

4. Uses or disclosures permitted by law

Certain state and federal laws and regulations either require or permit us to make certain uses or disclosures of your health information without your permission. These uses or disclosures are generally made to meet public health reporting obligations or to ensure the health and safety of the public at large. The uses or disclosures which we may make pursuant to these laws and regulations include the following:

a. Public health activities. We may use or disclose your personal/health information to public health authorities that are authorized by law to receive and collect health information for the purpose of preventing or controlling disease, injury or disability. We may use or disclose your personal/health information for the following purposes:

- i. To report deaths
- ii. To report suspected or actual abuse, neglect, or domestic violence involving a child or an adult
- iii. To report adverse reactions to medications or problems with health care products
- iv. To notify individuals of product recalls
- v. To notify an individual who may have been exposed to a disease or may be at risk for spreading or contracting a disease or condition

b. Health oversight activities. We may use or disclose your personal/health information to a health oversight agency that is authorized by law to conduct health oversight activities. These oversight activities may include audits, investigations, inspections, or licensure and certification surveys. These activities are necessary for the government to monitor the persons or organizations that provide health care to individuals and to ensure compliance with applicable state and federal laws and regulations.

c. Judicial or administrative proceedings. We may use or disclose your personal/health information to courts or administrative agencies charged with the authority to hear and resolve lawsuits or disputes. We may disclose your personal/health information pursuant to a court order, a subpoena, a discovery request, or other lawful process issued by a judge or other person involved in the dispute, but only if efforts have been made to (i) notify you of the request for disclosure or (ii) obtain an order protecting your health information.

d. Worker's compensation. We may use or disclose your personal/health information to worker's compensation programs when your health condition arises out of a work-related illness or injury.

e. Law Enforcement official. We may use or disclose your personal/health information in response to a request received from a law enforcement official for the following purposes:

- i. In response to a court order, subpoena, warrant, summons or similar lawful process
- ii. To identify or locate a suspect, fugitive, material witness, or missing person
- iii. Regarding a victim of a crime if, under certain limited circumstances, we are unable to obtain the person's authorization
- iv. To report a death that we believe may be the result of criminal conduct
- v. In emergency situations, to report a crime-the location of the crime; and possible victims; or the identity, description, or location of the individual who committed the crime.

f. Coroners, medical examiners, or funeral directors. We may use or disclose your health information to a coroner or medical examiner for the purpose of identifying a deceased individual or to determine the cause of death. We also may use or disclose your health information to a funeral director for the purpose of carrying out his/her necessary activities.

g. Organ procurement organizations or tissue banks. If you are an organ donor, we may use or disclose your personal/health information to organizations that handle organ procurement, transplantation, or tissue banking for the purpose of facilitating organ or tissue donation or transplantation.

h. Research. We may use or disclose your health information for research purposes under certain limited circumstances. Because all research projects are subject to a special approval process, we will not use or disclose your personal/health information for research purposes until the particular research project for which your health information may be used or disclosed has been approved through this special approval process. However, we may use or disclose your personal/health information to individuals preparing to conduct the research project in order to assist them in identifying members with specific health care needs who may qualify to participate in the research project. In most instances, we will ask for your specific permission to use or disclose your personal/health information if the researcher will have access to your name, address or other identifying information.

i. To avert a serious threat to health or safety. We may use or disclose your health information when necessary to prevent a serious threat to the health or safety of you or other individuals. Any such use or disclosure would be made solely to the individual(s) or organization(s) that have the ability and/or authority to assist in preventing the threat.

j. Military and veterans. If you are a member of the armed forces, we may use or disclose your personal/health information as required by military command authorities.

k. National security and intelligence activities. We may use or disclose your personal/health information to authorized federal officials for purposes of intelligence, counterintelligence, and other national security activities, as authorized by law.

l. Inmates. If you are an inmate of a correctional institution or under the custody of a law enforcement official, we may use or disclose your health information to the correctional institution or to the law enforcement official as may be necessary (i) for the institution to provide you with health care; (ii) to protect the health or safety of you or another person; or (iii) for the safety and security of the correctional institution.

m. To Business Associates. We may enter into contracts with entities known as Business Associates that provide services to or perform functions on behalf of Live Better At Home. We may disclose protected health information to Business Associates once they have agreed in writing to safeguard the protected health information. For example, we may disclose your protected personal/health information to a Business Associate in order to coordinate services for you. Business Associates are also required by law to protect protected personal/health information.

5. Uses or disclosures required by law

We may use or disclose your information where such uses or disclosures are required by federal, state or local law.

D. Your rights regarding your health information

You have the following rights regarding your health information which we create and/or maintain:

1. Right to inspect and copy. You have the right to inspect and copy health information that you have submitted and is stored, and or maintained by Live Better At Home. To inspect and copy your health information, you must submit your request in writing to Live Better At Home. If you request a copy of the information, we may charge a fee for the costs of copying, mailing, or other supplies associated with your request.

2. Right to request an amendment. If you feel that the health information we have about you is incorrect or incomplete, you may ask us to amend the information. You have the right to request an amendment for as long as the information is kept by or for our organization.

To request an amendment, your request must be made in writing and submitted to Live Better At Home. In addition, you must provide us with a reason that supports your request.

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

a. was not created by us, unless the person or entity that created the information is no longer available to make the amendment

b. is not part of the health information kept by or for our organization.

c. is not part of the information which you would be permitted to inspect and copy or

d. is accurate and complete

3. Right to an accounting of disclosures. You have the right to request an accounting of the disclosures which we have made of your health information. This accounting will not include disclosures of health information that we made for purposes of treatment, payment, or health care operations.

To request an accounting of disclosures, you must submit your request in writing to the Masonic Pathways Privacy Officer. Your request must state a time period that may not be longer than six (6) years prior to the date of your request and may not include dates before April 14, 2003. Your request should indicate in what form you want to receive the accounting (for example, on paper or via electronic means). The first accounting that you request within a twelve (12)-month period will be free. For additional accountings, we may charge you for the costs of providing the accounting within the same twelve month period. 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.

4. Right to request restrictions. You have the right to request a restriction or limitation on the health information we use or disclose about you for treatment, payment, or health care operations. You also have the right to request a limit on the health information we disclose about you to someone, such as a family member or friend, who is involved in your care or in the payment of your care. For example, you could ask that we not use or disclose information regarding a particular treatment that you received.

We are not required to agree to your request. If we do agree, we will comply with your request unless the information is needed to provide emergency treatment to you.

To request restrictions, you must make your request in writing to the Masonic Pathways Privacy Officer. In your request, you must tell us (a) what information you want to limit; (b) whether you want to limit our use, disclosure or both; and (c) to whom you want the limits to apply (for example, disclosures to a family member).

5. Right to request confidential communications. You have the right to request that we communicate with you about your health care in a certain way or at a certain location. For example, you can ask that we only contact you at work or by mail.

To request confidential communications, you must make your request in writing to the Masonic Pathways Privacy Officer. We will not ask you the reason for your request. We will accommodate all reasonable requests. Your request must specify how or where you wish to be contacted.

6. Right to a paper copy of this notice. You have the right to receive a paper copy of this notice. You may ask us to give you a copy of this Notice at any time. Even if you have agreed to receive this notice electronically, you are still entitled to a paper copy of this notice.

You may obtain a copy of this notice at our Web site www.livebetterathome.com

To obtain a paper copy of this notice, contact a Live Better At Home representative.

7. Right to be notified of a breach. You have the right to be notified in the event that we (or one of our Business Associates) discover a breach of your unsecured protected health information. Notice of any such breach will be made in accordance with federal requirements.

E. Complaints

If you believe your privacy rights have been violated, you may file a complaint with the Masonic Pathways Privacy Officer. All complaints must be submitted in writing to:

Masonic Pathways Privacy Officer
1200 Wright Ave
Alma, MI 48801

You may also file a complaint with the United States Department of Health and Human Services (DHHS). The Regional Office of DHHS may be contacted at:

Office for Civil Rights

U.S. Department of Health and Human Services

233 N. Michigan Ave., Suite 240

Chicago, IL 60601

Phone (312)886-2359

You will **NOT** be penalized for filing a complaint.

F. Technology Use on the Live Better At Home Website

Information about you and your use of this website is collected through the use of session cookies. Session cookies are small text files that are stored within your computer. These files are used to facilitate your navigation throughout this website.

Persistent cookies are small computer files that are transferred to your computer's hard drive. These stored files are used in the generation of data that is fed to a contracted third party for website

usage analysis. Reports created using this information will provide Live Better At Home with a better understanding of the use of this website.

Information stored within both session and persistent cookies are not tied to your Personally Identifiable Information.

If you are concerned about the storage and use of cookies, you may be able to direct your Internet browser to notify you and seek approval whenever a cookie is being sent to your hard drive. You may also delete a cookie manually from your hard drive through your Internet browser or other programs. You can also set your browser to refuse all cookies. Please note, however, that some parts of this website may not function properly or be available to you if you refuse to accept a cookie or choose to disable the acceptance of cookies.

To gauge the effectiveness of this website, we may collect non-personal information about our website users. This information may include, among other things, your: IP address, browser type, internet service provider (ISP), domain names, referring/exit pages, operating system, date/time stamp, and clickstream data. We use this information, which does not identify individual users, to analyze trends, to administer the website, to track users' movements around the site and to gather demographic information about our user base as a whole. We do not link this automatically collected data to personal information.

G. Internal Security Procedures

Information that you share on the website is kept strictly confidential and fully secure. Your encrypted (encoded) information is protected using "Secure Socket Layers (SSL)" as it passes between your browser and this website. We follow generally accepted industry standards to protect the personal information submitted to us, both during transmission and once we receive it.

No method of transmission over the Internet, or method of electronic storage, is 100% secure, however. Therefore, while we strive to use commercially acceptable means to protect your personal information, we cannot guarantee its absolute security. Only authorized persons are permitted to access your personal information. All authorized persons must abide by security, privacy, and confidentiality agreements.

H. E-mail

If you send questions or comments to an e-mail address listed within this website or via a contact form located within this website, we will share your correspondence with a Live Better At Home associate most capable of addressing your questions and concerns. We will retain your communications until we have done our very best to provide you with a complete and satisfactory response. Ultimately, we will either discard your communication or, in some cases, archive it. We will not keep your e-mail address for secondary purposes. All information and correspondence you share with us will be handled in the strictest confidence.

We may agree that e-mail has become a standard communication tool used by many different parties. Unfortunately by design standard internet e-mail is not secure. For that reason, please do not use unsecured e-mail to communicate information to us that you may consider to be confidential.

More Information

Please contact the Masonic Pathways Privacy Officer at (989) 466-3141 if you have any questions regarding this notice.