

Antrim County Privacy Notice

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

Our Commitment Regarding Your Protected Health Information

We understand the importance of our Protected Health Information (hereafter referred to as "PHI") and follow strict policies (in accordance with state and federal privacy laws) to keep your PHI private. PHI is information about you, including demographic data, that can reasonably be used to identify you and that relates to your past, present or future physical or mental health, the provision of health care to you or the payment for that care.

In this notice, we explain how we protect the privacy of your PHI, and how we will allow it to be used and given out ("disclosed"). We must follow the privacy practices described in this notice while it is in effect. This notice takes effect October 11, 2018 and will remain in effect until we replace or modify it.

We reserve the right to change our privacy practices and the terms of this notice at any time, provided that applicable law permits such changes. These revised practices will apply to your PHI regardless of when it was created or received. We will mail a revised notice to our health plan subscribers.

Where multiple state or federal laws protect the privacy of your PHI, we will follow the requirements that provide greatest privacy protection. For example, when you authorize disclosure to a third party, state laws requires us to condition the disclosure on the recipient's promise to obtain your written permission to disclose to someone else.

Use and Disclosure of Health Information

Antrim County may use health information that is protected by the Privacy Rule promulgated pursuant to the Health Insurance Portability and Accountability Act of 1996 ("HIPAA"), for purposes of making or obtaining payment for your care and conducting health care operations. Antrim County has established a policy to guard against unnecessary disclosure of your health information.

THE FOLLOWING IS A SUMMARY OF THE CIRCUMSTANCES UNDER WHICH AND PURPOSES FOR WHICH YOUR HEALTH INFORMATION MAY BE USED AND DISCLOSED:

To Make or Obtain Payment. Antrim County will use and disclose your PHI to facilitate claims processing and payment. Antrim County will use health information to pay our Business Associates for claims processed on your (or a covered spouse or dependent's) behalf and to assist covered members with claims questions and payment. Antrim County may disclose your PHI to providers to your health care, as permitted, to facilitate treatment, claims processing and claims payment. Antrim County will disclose your health information, for example, to a health care provider's office or facility as it relates to the plan in which you are enrolled, to facilitate your claims processing and payment. Antrim County periodically receives your PHI from our plan administrators (Business Associates), discloses your PHI to

our plan administrators and uses health information to determine benefits payable and to make payment for benefit claims or services rendered and payable under the plan. Antrim County may disclose PHI to a health care provider or plan administrator for the purpose of health care fraud and abuse detection or compliance. Antrim County may also use and disclose your health information when you (or a covered spouse or dependent) request assistance with obtaining information related to the payment of claims or when questioning services covered under the plan. Antrim County may use or disclose a covered dependent's health information to a parent requesting assistance with obtaining information relate to the payment of claims on the covered dependent's behalf or when questioning services for the covered dependent that may be payable under the plan.

To Conduct Health Care Operations

Antrim County may use or disclose health information for activities related to plan administration such as quality assessment and improvement, cost containment, care coordination, underwriting/rating, medical review, legal service, auditing and general administrative activities. For example, health information may be disclosed to obtain premium rating to create, renew or replace health insurance or health benefits for an employee group. Summary health care information will be used internally by Antrim County as part of the business planning and development process, including benefit cost management; analyses and general benefit plan administrative activities.

For Distribution of Health-Related Benefits and Services Information

Antrim County may use summary health information to provide plan participants with information on health-related benefits and services that may be of interest. For example, summary health information may be used to target general communications to all plan participants, providing them with information on benefits and services provided or generally available under the plan and/or providing participants with information they may use to better utilize plan benefits.

When Legally Required

Antrim County will disclose your health information when it is required to do so by any federal, state or local law.

To Conduct Health Oversight Activities

Antrim County may disclose your health information to a health oversight agency for authorized activities including audits, civil administrative or criminal investigations, inspections, licensure or disciplinary action. Antrim County, however, may not disclose your health information if you are the subject of an investigation and the investigation does not arise out of or is not directly related to your receipt of health care of public benefits.

In Connection With Judicial and Administrative Proceeding

As permitted or required by state law, Antrim County may disclose your health information in the course of any judicial or administrative proceeding in response to an order of a court or administrative tribunal as expressly authorized by such order or in response to a subpoena, discovery require or other lawful process, but only when Antrim County makes reasonable efforts to either notify you about the request or to obtain an order protecting your health information.

For Law Enforcement Purposes

As permitted or required by state law, Antrim County may disclose your health information to a law enforcement official for certain law enforcement purposes, including, but not limited to, if Antrim County has a suspicion that your death was the result of criminal conduct or in an emergency to report a crime.

In the Event of a Serious Threat to Health or Safety

Antrim County may, consistent with applicable law and ethical standards of conduct, disclose your health information if Antrim County, in good faith, believes that such disclosure is necessary to prevent or lessen a serious and imminent threat to your health or safety or to the health and safety of the public.

For Specified Government Functions

In certain circumstances, federal regulations require Antrim County to use or disclose your health information to facilitate specified government functions related to the military and veterans, national security and intelligence activities, protective services for the president and others, and correctional institutions and inmates.

For Workers' Compensation

Antrim County may release your health information to the extent necessary to comply with laws related to workers' compensation or similar programs.

For Other Purposes

Antrim County may use or disclose your health information for other purposes for which the Health Plan is permitted to do so pursuant to the Privacy Rule without your written authorization or consent.

YOUR RIGHTS WITH RESPECT TO YOUR HEALTH INFORMATION

You have the following rights regarding your health information that Antrim County maintains:

Right to Request Restrictions

You may request restrictions on certain uses and disclosures of your health information. You have the right to request a limit on Antrim County disclosure of your health information to someone involved in the payment of your care. However, Antrim County is not required to agree to your request. If you wish to make a request for restrictions, please contact Stephanie Murray at 231-533-3605.

Right to Receive Confidential Communications

You have the right to request that Antrim County communicate with you in a certain way if you feel the disclosure of your health information could endanger you. For example, you may ask that Antrim County only communicate with you at a certain telephone number or by email. If you wish to receive confidential communications, please make your request, including a statement that the restriction is

necessary to prevent a disclosure that could endanger you, in writing to the privacy officer of Antrim County as addressed on page 5.

Antrim County will attempt to honor your reasonable requests for confidential communications.

Right to Inspect and Copy Your Health Information

You have the right to inspect and copy your health information. A request to inspect and copy records containing your health information must be made in writing to the privacy officer of the County as addressed on page 5.

If you request a copy of your health information, Antrim County may charge a reasonable fee copying, assembling costs and postage, if applicable, associated with your request.

Right to Amend Your Health Information

If you believe that your health information records are inaccurate or incomplete, you may request that Antrim County amend the records. That request may be made as long as the information is maintained by Antrim County. A request for an amendment of records must be made in writing to the privacy officer of the County as addressed on page 5.

Antrim County may deny the request if it does not include a reason to support the amendment. The request also may be denied if your health information records were not created by Antrim County, if the health information you are requesting to amend is not part of Antrim County records, if the record may not legally be changed (such as information compiled in anticipation of a civil, criminal or administrative proceeding), the health information you wish to amend falls within an exception to the health information you are permitted to inspect and copy, or if Antrim County determines the records containing your health information are accurate and complete.

Right to an Accounting of Disclosures

You have the right to request a list of certain disclosures of your health information that Antrim County is required to keep a record of under the Privacy Rule for disclosures that have occurred up to six (6) years prior to the date you ask. The disclosures will include all disclosures except for those about treatment, payment and health care operations, and certain other disclosures (such as any you asked us to make). The request must be made in writing to the privacy officer of the County as addressed on page 5.

The request should specify the time period for which you are requesting the information. Accounting requests may not be made for periods of time going back more than six (6) years. Antrim County will provide the first accounting you request during any 12-month period without charge. Subsequent accounting requests may be subject to a reasonable cost-based fee. Antrim County will inform you in advance of the fee, if applicable.

Right to a Paper Copy of this Notice

You have a right to request and receive a paper copy of this Notice at any time, even if you have received this Notice previously or agreed to receive the Notice electronically. To obtain a paper copy,

please contact Stephanie Murray at 231-533-3605. You may also obtain a copy of the Privacy Notice at www.antrimcounty.org.

DUTIES OF HEALTH PLAN

Antrim County is required by law to maintain the privacy of your health information as set forth in this Notice, to provide you this Notice of its duties and privacy practices, and to notify affected individuals following a breach of unsecured PHI. Antrim County is required to abide by the terms of this Notice, which may be amended from time to time. Antrim County reserves the right to change the terms of this Notice and to make the new Notice provisions effective for all health information that it maintains. If Antrim County changes its policies and procedures, Antrim County will revise the Notice and will provide a copy of the revised Notice to you within 60 days of the change. The revised policy will also be posted on the Antrim County website. You have the right to express complaints to Antrim County and to the Secretary of the Department of Health and Human Services if you believe that your privacy rights have been violated. Any complaints to Antrim County should be made in writing to the privacy officer of the County as addressed below.

Antrim County encourages you to express any concerns you may have regarding the privacy of your information. You will not be retaliated against in any way for filing a complaint.

CONTACT PERSON

Antrim County has designated a Privacy/Security Officer as its contact person for all issues related to the Antrim County Privacy Notice and your privacy rights. You may contact this person at:

Stephanie Murray
Antrim County
P.O. Box 187
Bellaire, MI 49615
Fax Number: 231-533-8111
Telephone Number: 231-533-3605

EFFECTIVE DATE: 10/11/2018