



## **NOTICE OF PRIVACY PRACTICES OF PROTECTED HEALTH INFORMATION and PATIENT GRIEVANCE PROCEDURE**

### **THIS NOTICE DESCRIBES**

- **HOW MEDICAL INFORMATION ABOUT YOU MAY BE USED AND DISCLOSED**
- **HOW YOU MAY GET ACCESS TO THIS INFORMATION.**
- **HOW TO FILE A GRIEVANCE REGARDING YOUR SERVICE**

---

Sturgis Hospital, any identified healthcare partners, all departments and units, any member of our hospital auxiliary group, all associates, and other hospital personnel are dedicated to protecting your medical information. We are required by law to maintain the privacy of protected health information and to provide you with this notice of our legal duties and privacy practices with respect to protected health information.

Sturgis Hospital is required by law to abide by the terms of this Notice, and we reserve the right to change the terms of this Notice, making any revision applicable to all the protected health information we maintain. If Sturgis Hospital revises the terms of this Notice, it will be posted in all our locations and we will make paper copies of this Notice of Privacy Practices for Protected Health Information available upon request. You may also obtain a copy of this Notice at our website at [www.sturgishospital.com](http://www.sturgishospital.com).

### **HOW YOUR MEDICAL INFORMATION WILL BE USED AND DISCLOSED:**

Sturgis Hospital will use your medical information as part of rendering patient care. For example, your medical information may be used by the health care professional treating you, by the business office to process your payment for the services rendered, and by administrative personnel reviewing the quality and appropriateness of the care you receive.

Sturgis Hospital may also use and/or disclose your information in accordance with federal and state laws for the following purposes:

- Sturgis Hospital may contact you to provide appointment reminders.
- Sturgis Hospital may disclose your name to an independent survey company to contact you for the purpose of quality assurance and/or customer satisfaction.
- Sturgis Hospital may disclose medical information when required by the United States Department of Health and Human Services as part of an investigation or determination of the Hospital's compliance with relevant laws.
- Unless you object, and with the exception of behavioral health patients, Sturgis Hospital will include general information, including your name, location in the hospital, and your condition described in general terms in a directory of individuals located in the Hospital. The directory information will be released to people who ask for you by name.
- Unless you object, and with the exception of behavioral health patients, Sturgis Hospital may disclose to family members, other relatives or close personal friends the medical information directly relevant to such person's involvement with your care.
- Unless you object, and with the exception of behavioral health patients, Sturgis Hospital may use or disclose your medical information to notify a family member, a personal representative or another person responsible for your care of your location, general condition or death.
- Sturgis Hospital may disclose your medical information to a public or private entity for the purpose of coordinating with that entity to assist in disaster relief efforts.
- Sturgis Hospital may use or disclose your medical information for public health activities, including the reporting of disease, injury, vital events and the conduct of public health surveillance, investigation and/or intervention. Sturgis Hospital may disclose your medical information to a health oversight agency for oversight activities authorized by law, including audits, investigations, inspections, licensure or disciplinary actions, administrative and/or legal proceedings.
- Sturgis Hospital may disclose your medical information in the course of certain judicial or administrative proceedings.
- Sturgis Hospital may disclose your medical information for law enforcement purposes or other specialized governmental functions.
- Sturgis Hospital may disclose your medical information to a coroner, medical examiner or a funeral director.
- If you are an organ donor, Sturgis Hospital may disclose your medical information to an organ donation and procurement organization.
- Sturgis Hospital may use or disclose your medical information for certain research purposes.
- Sturgis Hospital may use or disclose your medical information to prevent or lessen a serious threat to the health or safety of another person or the public.
- Sturgis Hospital may disclose your medical information as authorized by laws relating to workers' compensation or similar programs.

- Sturgis Hospital may participate in a health information exchange organization (“HIE”) that permits computer-based transfer of health information directly between healthcare providers at different locations and institutions to facilitate your care and treatment.

Sturgis Hospital must obtain your Authorization to use or disclose health information for marketing purposes, or for disclosures that constitute the sale of medical information. If you provide us an Authorization to use or disclose your health information, you may revoke your authorization **in writing** at any time. If you revoke your Authorization, we will no longer use or disclose health information about you for the reasons covered by your Authorization. Sturgis Hospital will not use or disclose your medical information not covered by this Notice or the laws that apply to use without your written authorization.

#### **YOUR RIGHTS REGARDING YOUR MEDICAL INFORMATION:**

You have the following rights with respect to your medical information:

- The right to request restrictions or limitations on certain uses and disclosures of your medical information. Sturgis Hospital is **not required** to agree to your requested restriction. If we do agree, we will comply with your request unless the information is needed to provide you emergency treatment. We must agree to your request if *you have paid for the care out-of-pocket, in-full, and you are asking us not to submit information about that care to your health plan.*
- The right to receive communications from Sturgis Hospital in a confidential manner. You have the right to request that we communicate with you in an alternative way or at a certain location. To request confidential communications, we ask that you make your request in writing. We will accommodate all reasonable requests.
- The right to inspect and copy your medical information. This right is subject to certain specific exceptions. We ask that your request be made in writing. You may request the copy of your health information be provided in a summary format. You may also request the copy be provided on paper (“hard copy”) or in an electronic form or format. Sturgis Hospital may charge a reasonable fee for any copies of your records.
- The right to request an amendment of your medical information. We ask that your request be made in writing. Sturgis Hospital may deny your request for certain specific reasons, and, if denied, the Hospital will provide you with a written explanation for the denial and information regarding further rights you would have at that point.
- The right to receive an accounting of the disclosures of your medical information made by Sturgis Hospital except for disclosures for treatment, payment or Hospital operational purposes, and for certain other specific disclosure types. Your request must state a time period which may not be longer than six years. The first list you request within a twelve-month period will be free. For additional lists during such twelve-month period, Sturgis Hospital may charge you a reasonable fee.
- The right to notification of a breach. Sturgis Hospital must notify you if your unsecured protected health information has been the subject of a breach.
- The right to request a paper copy of this Notice of Privacy Practices for Protected Health Information.
- The right to complain to Sturgis Hospital and/or to the United States Department of Health and Human Services (DHHS) if you believe that the Hospital has violated your privacy rights. To complain to Sturgis Hospital, please contact the Privacy Officer at (269) 659-4219. To complain to DHHS, call 1-877-696-6775 toll free. If you choose to file a complaint, you will not be retaliated against in any way.

#### **YOUR RIGHTS REGARDING FILING A GRIEVANCE CONCERNING YOUR SERVICE FROM STURGIS HOSPITAL OR ITS AFFILIATE CLINICS:**

- You have the right to file a Grievance with Sturgis Hospital, or with the appropriate State, QIO or Federal regulatory agencies governing healthcare organizations regardless of whether or not you have gone through the internal hospital grievance process. A patient grievance may be taken by any Hospital associate.
- Internal patient grievances shall be sent to the appropriate director or department manager, who shall research the incident and take necessary action in a timely manner (30 days) whenever possible. The director or department manager shall respond in writing to the patient or patient’s representative.

If you would like further information regarding your rights or regarding the uses and disclosures of your medical information, you may contact the Privacy Officer.

EFFECTIVE AS OF: September 2013

Reviewed: March 2017