

Summary of Notice of Privacy Information Practices and Values and Expectation Statement

Souderton Mennonite Homes
Souderton, PA

SUMMARY OF NOTICE OF PRIVACY INFORMATION PRACTICES

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

Our organization's policy regarding your protected health information (PHI).

We are committed to preserving the privacy and confidentiality of your protected 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 protected health information.

Uses or disclosures of your protected health information.

We may use or disclose your protected health information in one of following ways:

1. 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 verbal agreement (for use in our organization directory or to discuss your health condition with family or friends who are involved in your care);
4. As permitted by law
 - Health oversight activities.
 - Worker's compensation.
 - Organ procurement organizations or tissue banks.
 - Research.
 - To avert a serious threat to health or safety.
 - Military and veterans.
 - National security and intelligence activities.
5. As required by law
 - Public health activities
 - Judicial or administrative proceedings
 - Law Enforcement official

Your rights regarding your protected health information

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

1. **Right to inspect and copy.** To inspect and copy your protected health information, you must submit your request in writing. 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.

Summary of Notice of Privacy Information Practices

Pg. 2

2. **Right to request an amendment.** If you feel that the protected 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. Your request for Amendment may be denied. Please see the Privacy Notice for details.
3. **Right to an accounting of disclosures.** You have the right to request an accounting of the disclosures, which we have made of your protected health information. To request an accounting of disclosures, you must submit your request in writing.
4. **Right to request restrictions.** You have the right to request a restriction or limitation on the protected 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 protected 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. To request restrictions, you must make your request in writing.
5. **Right to request confidential communications.**
To request confidential communications, you must make your request in writing.
6. **Right to a paper copy of this notice.** A full copy has been provided to you. Additional copies can be obtained from our

Business Office.

Complaints

If you believe your privacy rights have been violated, you may file a complaint with our organization, by using our confidential hotline service, the Friends Compliance Line at 1-800-211-2713 or with the secretary of the Department of Health and Human Services. To file a complaint with our organization or if you have any questions regarding this notice, contact::

Karla Dreisbach
Senior Director of Compliance/Compliance Officer
1777 Sentry Parkway West
Dublin Hall, Suite 208
Blue Bell, PA 19422
(215) 619-7949
All complaints must be submitted in writing.

You will NOT be penalized for filing a complaint.

Statement of Values and Expectations

It is the personal responsibility of all employees to fully understand the policies and procedures applicable to their assigned duties and to conduct themselves accordingly.

Each employee should carry out their work on the basis of the following values and expectations:

Resident/Client Care and Rights

- Our highest priority is the health and safety of our residents/clients and our employees.
- Compassion and care are part of our commitment to the community we serve.
- We involve residents in all aspects of their care and obtain informed consent for treatment.
- Residents and their representatives will be assured appropriate confidentiality, privacy, security and protective services, and opportunity for resolution of complaints.
- Residents are treated in a manner that preserves their dignity, autonomy, self-esteem, civil rights, and involvement in their own care.
- Our organization's values and federal regulations recognize residents' rights to be free of physical restraints imposed or drugs administered for the purposes of discipline or staff convenience.

Resident Information

- We do not release or discuss information about specific residents with others unless it is necessary to serve the resident or required by law.
- No employee may ever disclose confidential information that violates the privacy rights of our residents.
- Our organization will provide resident/client or their representative with a Notice of Privacy Practices upon admission.

Resident/Client Referrals

- We do not pay for referrals. We do not pay or offer to pay anyone— colleagues, physicians, or other persons—for referral of residents.
- We do not accept payment for referrals that we make to other service providers.

Billing and Clinical Records

- We take great care to assure that all billings to government, clients and private insurance payers reflect truth and accuracy.
- We only bill for services actually provided.
- We maintain current and accurate medical records belonging to Souderton Mennonite Homes.

Cost Reporting

- We comply with federal and state laws relating to all cost reports.

Regulatory Compliance

- All staff must be knowledgeable about and insure compliance with all laws and regulations, as they apply in their field of

expertise.

Physicians

- Any business arrangement with a physician must ensure compliance with legal requirements.

Relations with Government

- We are honest in dealings with government officials.
- We do not offer or make payments or give anything of value to an employee or representative of a government agency at any level.

Relationships with Subcontractors, Suppliers, Consultants, and Vendors

- All officers and employees will comply with Souderton Mennonite Homes' policies on acceptance of gifts and courtesies from vendors.
- Employees and officers must comply with Souderton Mennonite Homes' policies on disclosure of conflicts of interest.
- Any subcontractors who will receive resident/client information, with the exception of care providers, will enter into a Business Associate Agreement with our organization.

Additional Standards

- Souderton Mennonite Homes only employs or works with persons with proper credentials, experience and expertise.
- No deficiency or error should be ignored or covered up.
- Employees will not pursue any business opportunity that requires unethical or illegal activity.
- Employees must comply with Souderton Mennonite Homes' policies governing private employment by residents/clients.
- Employees must comply with Souderton Mennonite Homes' policies on acceptance of gifts, entertainment, or other courtesies from residents/clients.
- Employees must comply with Souderton Mennonite Homes' policies on pursuit of outside business interests while on the job.
- Employees are not authorized to enter into any joint venture, partnership, or other revenue sharing arrangement with any entity that is a potential or actual referral source.
- No funds or assets of Souderton Mennonite Homes shall be used for federal, state or local political contributions.
- Employees shall comply fully with policies and procedures concerning the accuracy and reliability of all business and clinical records.

Administration of the Values and Expectations Statement

- Any questions regarding the Values and Expectations Statement should be directed to the employee's supervisor or to the Compliance and Privacy Liaison. Employees are expected to cooperate fully in any investigation of a potential violation.