

Career Opportunity Development, Inc. (CODI) Notice of Privacy Practices

Career Opportunity Development, Inc. (CODI) shall safeguard Protected Healthcare Information (PHI) in compliance with all federal, state and local laws and regulations.

CODI's Notice of Privacy Practices describes how PHI may be used and/or disclosed. Health records contain personal information about consumer and consumer health. Information may identify consumer and relate to consumer's past, present or future mental or physical health and related health care services.

CODI's Notice of Privacy Practices describes how CODI may use and disclose PHI in accordance with applicable laws and regulations. The document also describes consumer rights regarding gaining access to and controlling PHI. CODI is required by law to maintain the privacy of PHI and to provide consumers with notice of CODI's legal duties and privacy practices related to protection of PHI. CODI is required to abide by the terms of this Notice of Privacy Practices and reserves the right to change the terms of our Notice of Privacy Practices at any time. Any new Notice of Privacy Practices will be effective for all PHI maintained by CODI. Notice of Privacy Practices is available on CODI's website www.njcodi.org and CODI's Administrative Offices located at 901 Atlantic Avenue, Egg Harbor City, New Jersey 08215.

Use and disclosure of PHI not specifically permitted by applicable law will be made only with consumer written authorization, which may be revoked at any time, except to the extent that CODI has already used or disclosed PHI based upon prior consumer authorization.

How CODI May Use and Disclose Protected Health Information (PHI)

Service Provision - PHI may be used and disclosed by those involved in consumer care to provide, coordinate, or manage services. PHI may be used or disclosed throughout all CODI programs by staff, volunteers, interns, all providers contracting with the New Jersey Department of Human Services, New Jersey Division of Mental Health and Addiction Services, New Jersey Division of Developmental Disabilities, Atlantic County Department of Family and Community Development, New Jersey Division of Vocational Services, New

Jersey Department of Labor, and government entities such as Social Security Administration, requiring PHI to research or process consumer benefits.

Payment and Operations - CODI may use or disclose, as needed, PHI to support business activities including, but not limited to, quality assessment and improvement, compliance, risk management, employee oversight, licensing, and conducting or arranging for other business activities. CODI may enter into contracts and share PHI with entities known as Business Associates providing services to or performing functions on behalf of CODI. CODI may disclose PHI to Business Associates who have agreed in writing to safeguard PHI. Business Associates are also required by law to protect PHI. Covered entities are prohibited from selling PHI.

Required by Law - Under the law, upon receipt of written request, CODI must disclose PHI, generated by CODI, to consumer. Requests must be submitted in writing to CODI's Quality Improvement Coordinator at 901 Atlantic Avenue, Egg Harbor City, New Jersey 08215 or by email to twinchester@njcodi.org.

Protected Health Information (PHI) Rights of Consumers

File Review - Consumer has the right, which may be restricted only in exceptional circumstances, to inspect and copy PHI maintained in "individual consumer file." A designated file contains PHI and other records used to make decisions regarding consumer care. Right may be restricted only in situations where there is compelling evidence that access would cause serious harm to the consumer.

Cost - CODI may charge a reasonable, cost-based fee for copies. If records are stored electronically, CODI is required to provide an electronic copy of records within 15 days of the request.

Change Process - Consumer may request staff to amend consumer records if consumer feels PHI is incorrect or incomplete. CODI is not required to agree to the change. If CODI denies the request for amendment; consumer has the right to file a statement of disagreement. CODI may prepare a rebuttal statement and will provide consumer with a copy.

Disclosure - Consumer has the right to request an accounting of the disclosures CODI makes of consumer PHI. CODI may charge a reasonable fee for requested information provided more than once in any 12-month period.

Use Restriction - Consumer has the right to request a restriction or limitation on the use or disclosure of PHI. CODI is not required to agree to request unless the request is to restrict disclosure of PHI to a health plan for purposes of carrying out payment or health care operations, and the PHI pertains to a health care item or service that consumer paid for out of pocket.

Communication - Consumer has the right to request CODI to communicate health matters in a certain way or at a certain location. CODI will accommodate reasonable requests and may require information regarding specification of an alternative address or another method of contact as a condition for accommodating consumer request.

Protected Health Information Disclosure without Consumer Authorization

Applicable law and ethical standards permit CODI to disclose consumer information without authorization in a limited number of situations including:

Child/Elderly/Disabled Abuse or Neglect – CODI may disclose PHI to a state or local agency authorized by law to receive reports of abuse or neglect.

Judicial and Administrative Proceedings – CODI may disclose PHI pursuant to federal, state, local law, subpoena, court order, or administrative order.

Upon Death – CODI may disclose PHI to coroners, medical examiners, and funeral directors. PHI of persons, deceased for more than fifty (50) years, is not protected under HIPAA.

Medical Emergencies – CODI may disclose PHI in a medical emergency situation to medical personnel to prevent serious harm.

Disaster Relief – CODI may disclose PHI to agencies assisting in a disaster relief effort.

Family Involvement in Care – CODI may disclose PHI to close family members or friends directly involved with consumer care to prevent serious harm.

Health Oversight - CODI may disclose PHI to a health oversight agency for activities authorized by law, such as audits, investigations, and inspections.

Oversight agencies seeking this information include government agencies and organizations providing financial assistance to the program (such as third-party payers), and peer review organizations performing utilization, accreditation, and quality improvement activities.

Law Enforcement, Public Safety, and Correctional Institutions – CODI may disclose PHI to prevent or lessen a serious or imminent threat to the health or safety of consumer or the safety of others. If information is disclosed to prevent or lessen a serious threat, disclosed information will be given to a person or persons believed to be reasonably able to prevent or lessen the threat.

Research - PHI may only be disclosed after a special approval process or with consumer authorization.

Organ, Eye, or Tissue Donation – If consumer is a donor, CODI may release PHI to organizations handling organ, eye, or tissue procurement or transplantation.

Workers' Compensation - CODI may release PHI when disclosure is necessary to comply with Workers' Compensation laws or purposes.

Breach of Information

If there is a breach of consumer PHI, CODI may be required to notify consumer of breach, including what occurred and what was done to prevent future occurrences. For additional information on breach of information, please contact twinchester@njcodi.org to request CODI's HIPAA Breach Notification Policy.

Alleged PHI Use or Disclosure Violation

If a consumer believes CODI has violated privacy rights, consumer has the right to file a written complaint with CODI's Quality Improvement Coordinator via mail at 901 Atlantic Avenue, Egg Harbor City, New Jersey 08215 or electronically at twinchester@njcodi.org or with the Secretary of the Department of Health and Human Services at (877) 696-6775, via mail at 200 Independence Avenue SW, Washington, DC 20201, or electronically through <http://www.hhs.gov/hipaa/filing-a-complaint/complaint-process/index.html>.

CODI will not retaliate against any consumer for filing a complaint.