

The Country Doctor, Ltd. acts to maintain the privacy of protected health information (PHI) and provide individuals with The Country Doctor, Ltd.'s Privacy Policy (CDLPP) of the practice's legal duties and privacy practices with respect to PHI and abide by the terms of the documents currently in effect. The Country Doctor provides the CDLPP to every patient with whom it has a direct treatment relationship, starting April 13, 2003. The CDLPP also is available to any member of the public to enable prospective patients to evaluate the practice's privacy policies. When a direct patient receives the CDLPP from the practice, The Country Doctor, Ltd. asks the patient to sign its "Receipt of the CDLPP" form, which is filed with the patient's medical record. If the patient refuses to sign the form, it is noted in the medical record that the patient refused to sign the form.

The Country Doctor, Ltd. reserves the right to revise the CDLPP whenever there is a material change to the uses or disclosures, the individual's rights, the covered entity's legal duties, or other privacy practices stated in the notice. If the CDLPP is revised, The Country Doctor, Ltd. makes the revised CDLPP available upon request beginning on the revision's effective date to all patients, including those who have received a previous notice. Upon receipt of a revised notice, the patient is asked to acknowledge receipt of the notice.

The Country Doctor, Ltd. allows all patients and their agents to file complaints with The Country Doctor, Ltd. and with the Secretary of the federal Department of Health and Human Services (DHHS), whenever a patient or his or her agent believes that The Country Doctor, Ltd. has violated a patient's privacy rights. Complaints to The Country Doctor, Ltd. must be in writing, must describe the acts or omissions that are the subject of the complaint, and must be filed within 180 days of the time the patient became aware or should have become aware of the violation. Complaints and privacy questions must be addressed to the privacy officer, Dr. David Mitchell, at The Country Doctor, Ltd, 2310 Country Road, Shiloh, IL 62221-2570. The Country Doctor, Ltd. investigates each complaint and may, at its discretion, reply to the patient or the patient's agent. Complaints to the Secretary of the DHHS must be in writing, must name the practice, must describe the acts or omissions that are the subject of the complaint, and must be filed within 180 days of the time the patient became aware or should have become aware of the violation. The Country Doctor, Ltd. does not take any adverse action against any patient who files a complaint, either directly or through an agent, against the practice.

The Country Doctor, Ltd. reasonably ensures that the PHI it requests, uses, and discloses for any purpose is the minimum amount of PHI necessary for that purpose. The Country Doctor, Ltd. treats all qualified individuals as personal representatives of patients and usually allows individuals to act as personal representatives of patients, with the general exceptions to allowing individuals to act as personal representatives related to unemancipated minors and abuse, neglect, or endangerment situations. In addition, The Country Doctor, Ltd. makes reasonable efforts to ensure that PHI is only used by and disclosed to individuals that have a right to the PHI. Toward that end, the practice makes reasonable efforts to verify the identity of those using or receiving PHI.

The Country Doctor, Ltd. uses and discloses PHI for payment, treatment, health care operations, and to those involved in a patient's care when the patient approves or, when the patient is not present or not able to approve, when such disclosure is deemed appropriate in the professional judgment of the practice. Treatment includes those activities related to providing services to the patient, including releasing information to other health care providers involved in the patient's care. Payment relates to all activities associated with reimbursement for services provided, including submission of claims to insurance companies and any additional information requested by the insurance company so that they can determine if they should pay the claim. Health care operations includes a number of areas, such as quality assurance and peer review activities. When the patient is not present, The Country Doctor, Ltd. determines whether the disclosure of the patient's PHI is authorized by law and if so, discloses only the information directly relevant to the person's involvement with the patient's health care.

The Country Doctor, Ltd. uses and discloses PHI to appropriate individuals as required by law and in emergency situations. As required by law, in emergency situations, or as agreed to by the individual, The Country Doctor, Ltd. discloses PHI to public health officials, including for reporting of communicable diseases and other conditions, sexually transmitted diseases, lead poisoning, Reyes Syndrome, and mandated reports of injury, medical conditions or procedures, or food-borne illness including but not limited to adverse reactions to immunizations, cancer, adverse pregnancy outcomes, death, birth, victims of child abuse or neglect, elderly victims of neglect, victims of domestic violence, information about a minor, disabled adult information, or person over 60 years of age who may be a victim of abuse or neglect. In addition, The Country Doctor, Ltd. discloses PHI for judicial and administrative proceedings in response to an order of a court or an administrative tribunal; in response to a subpoena, discovery request or other lawful process, not accompanied by a court order or an ordered administrative tribunal; for law enforcement purposes to law enforcement officials; to a coroner or medical examiner and funeral directors as required by law, including to sign a death certificate; to facilitate organ, eye or tissue donations; to public health and other authorities as required by law to avert a serious threat to health or safety, including for military and veterans activities, national security and intelligence activities, and other activities as required by law; for health oversight activities, such as when the information may be used and released for audits, investigations, licensure issues, and other health oversight activities, including, but limited to hospital peer review, managed care peer review, or Medicaid or Medicare peer review; and to provide treatment in emergency situations. In instances where The Country Doctor, Ltd. has not previously provided its CDLPP to a patient who receives direct treatment in an emergency situation, The Country Doctor, Ltd. provides the CDLPP to the individual as soon as practicable after the emergency treatment.