

	<b>Ethics &amp; Compliance Department</b>	
	<b>Policy No.: 5</b>	<b>Created:</b> 01/2018
		<b>Reviewed:</b> 09/2024
	<b>Revised:</b>	

## HIPAA: NOTICE OF PRIVACY PRACTICES

### SCOPE:

All Envision Healthcare teammates. For purposes of this policy, all references to “teammate” or “teammates” include temporary, part-time and full-time employees, independent contractors, clinicians, officers and directors.

### PURPOSE:

Envision Healthcare Operating, Inc. and its subsidiaries and affiliates (“Envision” or “the Company”) has adopted this Notice of Privacy Practices policy to ensure that individuals are provided with the information needed to clearly understand how their health information can be used or disclosed, their rights under HIPAA with respect to their health information, and how they can gain access to their health information. In addition, this policy establishes the administrative procedures regarding the maintenance of the notice.

### POLICY:

Individuals have a right to adequate notice of the uses and disclosures of protected health information (“PHI”) that may be made by the Company and of the individual’s rights and the Company’s legal duties with respect to PHI. NOTE: Facility-based providers will use and abide by the Organized Health Care Arrangement’s Joint Notice of Privacy Practices.

### **Provision of Notice**

The Notice of Privacy Practices (“Notice”) is made available as follows:

- A) A written copy is given to all patients the **first** time they receive treatment or upon first service (*See* current Notice of Privacy Practices form available on website). It is not necessary to provide a written copy of the Notice at subsequent visits or upon subsequent delivery of services.
- B) A copy of the Notice must be posted prominently in the waiting room or admissions area, if applicable for your department, where it can easily be read, as well as on the website, if one is maintained.
- C) Printed copies of the Notice are made available to any person (whether or not a patient) who requests a copy.
- D) Copies of the Notice may be provided electronically as long as the patient is advised that he or she may request a written copy as well.

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### **Acknowledgement of Receipt of Notice**

The first time the patient receives treatment or services, the patient or the patient’s authorized representative is asked to sign a receipt acknowledging that the Notice was provided. If the person’s signature cannot be obtained, a good faith attempt to obtain the acknowledgement should be documented.

After the patient signs and dates the Notice, the staff gives a copy of the Notice to the patient and files the original copy in the medical record or at the service location of treatment.

### **Emergencies**

In an emergency, it is not necessary to provide the Notice or obtain acknowledgement until after the emergency has been resolved.

### **Revisions to Notice**

Any changes to the Company Notice of Privacy Practices must be approved by the Privacy Official and Chief Compliance Officer to assure that the Notice contains all required elements and accurately reflects federal and state law. Before the Company may change its privacy practices in any way that is inconsistent with the current description, the Notice is revised to describe the change. The effective date of the new Notice is printed on the Notice and cannot be retroactive. Any time the Notice is revised, the revised copy must be posted prominently, and written copies must be made available upon request. If significant changes are made to the Notice, a written copy on the first visit or first service must be provided, and patient signature must be obtained as proof a copy was provided. Subsequent visits will not require a written copy be handed out unless patient requests a copy.

### **Retention**

The Company must retain copies of the Notices issued by the Company for six (6) years from the date of its creation or the date when it last was in effect, whichever is later.

### **Joint Notice of Privacy Practices**

The Company may participate in an organized health care arrangement that has established a Joint Notice of Privacy Practices (“Joint Notice”). In this case, the Company may rely on the Joint Notice provided that:

- A) The Company agrees to abide by the terms of the Joint Notice with respect to PHI created or received by the Company as part of its participation in the organized health care arrangement.

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- B) The Joint Notice meets the Company’s requirements for its Notice of Privacy Practices; and
- (1) Describes with reasonable specificity the providers or agencies, or classes of providers or agencies, to which the Joint Notice applies;
  - (2) Describes with reasonable specificity the service delivery sites, or classes of service delivery sites, to which the Joint Notice applies; and
  - (3) If applicable, states that the providers or agencies participating in the organized health care arrangement will share PHI with each other, as necessary, to carry out treatment, payment, or health care operations relating to the organized health care arrangement.
- C) The providers or agencies included in the Joint Notice must provide the Joint Notice to patients in accordance with the Company’s policies.

**Contact for Questions**

If a teammate has any questions or is uncertain about the requirements of this policy, such teammate should contact the Privacy Official.

**POLICY REVIEW**

The Ethics & Compliance Department will review and update this Policy, when necessary, in the normal course of its review of the Company’s Ethics & Compliance Program.