

Notice of Privacy Practices

This notice describes how medical information about you may be used and disclosed and how you can get access to this information. Please review it carefully.

YOU WILL BE ASKED TO SIGN A STATEMENT ON YOUR FIRST VISIT ACKNOWLEDGING THAT YOU HAVE READ THIS NOTICE. YOU MAY REQUEST A COPY OF THIS NOTICE FROM A CLERK OR ANY OF OUR FACULTY CLINICIANS AT ANY TIME.

If you have any questions about this Notice please contact our Privacy Officer, Dr. Tim Guest by telephone or email, whose contact information may be found at the end of this document.

This Notice of Privacy Practices describes how we may use and disclose your Protected Health Information to carry out treatment, payment or health care operations and for other purposes that are permitted or required by law. It also describes your rights to access and control your Protected Health Information. Protected Health Information is information about you, including demographic information, that may identify you and that relates to your past, present or future physical or mental health or condition and related health care services.

We are required to abide by the terms of this Notice of Privacy Practices. We may change the terms of our notice at any time. The new notice will be effective for all Protected Health Information that we maintain at that time. Upon your request, we will provide you with any revised Notice of Privacy Practices when you call the office and request that a revised copy be sent to you in the mail or ask for one at the time of your next appointment, or you may access our web site .

A.1 Uses and Disclosures of Protected Health Information Based upon Your Written Consent

You will be asked to sign a consent form. Once you have consented to use and disclosure of your Protected Health Information for treatment, payment and health care operations by signing the consent form, Joseph M LaCava DPM, PA will use or disclose your Protected Health Information as described in Section 1 of this document. Your Protected Health Information may be used and disclosed by our employees and others that are involved in your care and treatment for the purpose of providing health care services to you. Your Protected Health Information may also be used and disclosed to seek payment of your health care bills and to support the operation of Joseph M LaCava DPM, PA and its clinics.

Following are examples of the types of uses and disclosures of your protected health care information that Joseph M LaCava DPM, PA and its clinics are

permitted to make once you have signed our consent form. These examples are not meant to be exhaustive, but to describe the types of uses and disclosures that may be made by Joseph M LaCava DPM, PA once you have provided consent.

Treatment: We will use and disclose your Protected Health Information to provide, coordinate, or manage your health care and any related services. This includes the coordination or management of your health care with a third party that has already obtained your permission to have access to your Protected Health Information. For example, we would disclose your Protected Health Information, as necessary, to a home health agency that provides care to you. We will also disclose Protected Health Information to other physicians who may be treating you when we have the necessary permission from you to disclose your Protected Health Information. For example, your Protected Health Information may be provided to a physician to whom you have been referred to ensure that the physician has the necessary information to diagnose or treat you. In addition, we may disclose your Protected Health Information from time-to-time to another physician or health care provider (i.e. a specialist or laboratory) whom, at the request of the Faculty Clinician becomes involved in your care by providing assistance with your health care diagnosis or treatment to our Faculty Clinician.

Payment: Your Protected Health Information will be used, as needed, to obtain payment for your health care services. This may include certain activities that your health insurance plan may undertake before it approves or pays for the health care services we recommend for you, such as; making a determination of eligibility or coverage for insurance benefits, reviewing services provided to you for medical necessity, and undertaking utilization review activities.

Healthcare Operations: We may use or disclose, as-needed, your Protected Health Information in order to support the business activities of Joseph M LaCava DPM, PA and its clinics. These activities include, but are not limited to, quality assessment activities, employee review activities, training of our students, licensing, marketing and fundraising activities, and conducting or arranging for other business activities.

For example, we may disclose your Protected Health Information to our students that see patients on our campus. In addition, we may use a sign-in sheet at the registration desk where you will be asked to sign your name and indicate your student Intern. We may also call you by name in the waiting room when your Intern is ready to see you. We may use or disclose your Protected Health Information, as necessary, to contact you to remind you of your appointment.

We will share your Protected Health Information with third party business associates that perform various activities (e.g., billing, transcription services) for Joseph M LaCava DPM, PA and its clinics. Whenever an arrangement between our office and a business associate involves the use or disclosure of your

Protected Health Information, we will have a written contract that contains terms that will protect the privacy of your Protected Health Information.

We may use or disclose your Protected Health Information, as necessary, to provide you with information about treatment alternatives or other health-related benefits and services that may be of interest to you. We may also use and disclose your Protected Health Information for other marketing activities. For example, your name and address may be used to send you a newsletter about Joseph M LaCava DPM, PA and its clinics and the services we offer. We may also send you information about products or services that we believe may be beneficial to you. You may contact our Privacy Officer to request that these materials not be sent to you.

We may use or disclose your demographic information and the dates you received care, as necessary, in order to contact you for fundraising activities supported by Joseph M LaCava DPM, PA. If you do not want to receive these materials, please contact our Privacy Officer and request that these fundraising materials not be sent to you.

Uses and Disclosures of Protected Health Information Based upon Your Written Authorization

Other uses and disclosures of your Protected Health Information will be made only with your written authorization, unless otherwise permitted or required by law as described below. You may revoke this authorization at any time, in writing except to the extent that Joseph M LaCava DPM, PA or its clinics has taken an action in reliance on the use or disclosure indicated in the authorization.

Other Permitted and Required Uses and Disclosures That May Be Made With Your Consent, Authorization or Opportunity to Object

We may use and disclose your Protected Health Information in the following instances. You have the opportunity to agree or object to the use or disclosure of all or part of your Protected Health Information. If you are not present or able to agree or object to the use or disclosure of the Protected Health Information, then Joseph M LaCava DPM, PA's Faculty Clinicians may, using professional judgment, determine whether the disclosure is in your best interest. In this case, only the Protected Health Information that is relevant to your health care will be disclosed.

Others Involved in Your Healthcare: Unless you object, we may disclose to a member of your family, a relative, a close friend or any other person you identify, your Protected Health Information that directly relates to that person's involvement in your health care. If you are unable to agree or object to such a disclosure, we may disclose such information as necessary if we determine that it is in your best interest based on our professional judgment. We may use or disclose Protected Health Information to notify or assist in notifying a family

member, personal representative or any other person that is responsible for your care of your location, general condition or death. Finally, we may use or disclose your Protected Health Information to an authorized public or private entity to assist in disaster relief efforts and to coordinate uses and disclosures to family or other individuals involved in your health care.

Emergencies: We may use or disclose your Protected Health Information in an emergency treatment situation. If this happens, The Faculty Clinician shall try to obtain your consent as soon as reasonably practicable after the delivery of treatment. If we have attempted to obtain your consent but are unable to, we may still use or disclose your Protected Health Information to treat you.

Communication Barriers: We may use and disclose your Protected Health Information if we attempt to obtain consent from you but are unable to do so due to substantial communication barriers and the Faculty Doctor determines, using professional judgment that you intend to consent to use or disclosure under the circumstances.

Other Permitted and Required Uses and Disclosures That May Be Made Without Your Consent, Authorization or Opportunity to Object

We may use or disclose your Protected Health Information in the following situations without your consent or authorization. These situations include:

Required By Law: We may use or disclose your Protected Health Information to the extent that the use or disclosure is required by law. The use or disclosure will be made in compliance with the law and will be limited to the relevant requirements of the law. You will be notified, as required by law, of any such uses or disclosures.

Public Health: We may disclose your Protected Health Information for public health activities and purposes to a public health authority that is permitted by law to collect or receive the information. The disclosure will be made for the purpose of controlling disease, injury or disability. We may also disclose your Protected Health Information, if directed by the public health authority, to a foreign government agency that is collaborating with the public health authority.

Communicable Diseases: We may disclose your Protected Health Information, if authorized by law, to a person who may have been exposed to a communicable disease or may otherwise be at risk of contracting or spreading the disease or condition.

Health Oversight: We may disclose Protected Health Information to a health oversight agency for activities authorized by law, such as audits, investigations, and inspections, Oversight agencies seeking this information include government agencies that oversee the health care system, government benefit

programs, other government regulatory programs and civil rights laws.

Abuse or Neglect: We may disclose your Protected Health Information to a public health authority that is authorized by law to receive reports of child abuse or neglect. In addition, we may disclose your Protected Health Information if we believe that you have been a victim of abuse, neglect or domestic violence to the governmental entity or agency authorized to receive such information. In this case, the disclosure will be made consistent with the requirements of applicable federal and state laws.

Food and Drug Administration: We may disclose your Protected Health Information to a person or company required by the Food and Drug Administration to report adverse events, product defects or problems, biologic product deviations, track products; to enable product recalls; to make repairs or replacements, or to conduct post marketing surveillance, as required.

Legal Proceedings: We may disclose Protected Health Information in the course of any judicial or administrative proceeding in response to an order of a court or administrative tribunal (to the extent such disclosure is expressly authorized), in certain conditions in response to a subpoena, discovery request or other lawful process.

Law Enforcement: We may also disclose Protected Health Information, so long as applicable legal requirements are met, for law enforcement purposes. These law enforcement purposes include (1) legal processes and otherwise required by law, (2) limited information requests for identification and location purposes, (3) pertaining to victims of a crime, (4) suspicion that death has occurred as a result of criminal conduct, (5) in the event that a crime occurs on Joseph M LaCava DPM, PA premises, and (6) medical emergency (not on the Joseph M LaCava DPM, PA's premises) and it is likely that a crime has occurred.

Coroners, Funeral Directors, and Organ Donation: We may disclose Protected Health Information to a coroner or medical examiner for identification purposes, determining cause of death or for the coroner or medical examiner to perform other duties authorized by law. We may also disclose Protected Health Information to a funeral director, as authorized by law, in order to permit the funeral director to carry out their duties. We may disclose such information in reasonable anticipation of death Protected Health Information may be used and disclosed for cadaver organ, eye or tissue donation purposes.

Research: We may disclose your Protected Health Information to researchers when an institutional review board that has reviewed the research proposal and established protocols to ensure the privacy of your Protected Health Information has approved their research.

Criminal Activity: Consistent with applicable federal and state laws, we may disclose your Protected Health Information, if we believe that the use or

disclosure is necessary to prevent or lessen a serious and imminent threat to the health or safety of a person or the public. We may also disclose Protected Health Information if it is necessary for law enforcement authorities to identify or apprehend an individual.

Military Activity and National Security: When the appropriate conditions apply, we may use or disclose Protected Health Information of individuals who are Armed Forces personnel (1) for activities deemed necessary by appropriate military command authorities; (2) for the purpose of a determination by the Department of Veterans Affairs of your eligibility for benefits, or (3) to a foreign military authority if you are a member of a foreign military service. We may also disclose your Protected Health Information to authorized federal officials for conducting national security and intelligence activities, including for the provision of protective services to the President or others legally authorized.

Workers' Compensation: Your Protected Health Information may be disclosed by us as authorized to comply with workers' compensation laws and other similar legally established programs.

Inmates: We may use or disclose your Protected Health Information if you are an inmate of a correctional facility and Joseph M LaCava DPM, PA created or received your Protected Health Information in the course of providing care to you.

Required Uses and Disclosures: Under the law, we must make disclosures to you and when required by the Secretary of the Department of Health and Human Services to investigate or determine our compliance with the requirements of section 164.500.

A.2 Your Rights

The following is a statement of your rights with respect to your Protected Health Information and a brief description of how you may exercise these rights. You have the right to inspect and copy your Protected Health Information. This means you may inspect and obtain a copy of Protected Health Information about you that is contained in a designated record set for as long as we maintain the Protected Health Information. A designated record set contains medical and billing records and any other records that Joseph M LaCava DPM, PA and its clinics use for making decisions about you.

Under federal law, however, you may not inspect or copy the following records; psychotherapy notes; information compiled in reasonable anticipation of, or use in, a civil, criminal, or administrative action or proceeding, and Protected Health Information that is subject to law that prohibits access to Protected Health Information. Depending on the circumstances, a decision to deny access may be reviewable. In some circumstances, you may have a right to have

this decision reviewed. Please contact our Privacy Officer if you have questions about access to your medical record

You have the right to request a restriction of your Protected Health Information. This means you may ask us not to use or disclose any part of your Protected Health Information for the purposes of treatment, payment or healthcare operations. You may also request that any part of your Protected Health Information not be disclosed to family members or friends who may be involved in your care or for notification purposes as described in this Notice of Privacy Practices. Your request must state the specific restriction requested and to whom you want the restriction to apply.

Joseph M LaCava DPM, PA and its clinics are not required to agree to a restriction that you may request. If our Privacy Officer believes it is in your best interest to permit use and disclosure of your Protected Health Information, your Protected Health Information will not be restricted. If our Privacy Officer does agree to the requested restriction, we may not use or disclose your Protected Health Information in violation of that restriction unless it is needed to provide emergency treatment. With this in mind please discuss any restriction you wish to request with your Faculty Clinician. You may request a restriction by asking for a form from your Faculty Clinician.

You have the right to request to receive confidential communications from us by alternative means or at an alternative location. We will accommodate reasonable requests. We may also condition this accommodation by asking you for information as to how payment will be handled or specification of an alternative address or other method of contact. We will not request an explanation from you as to the basis for the request. Please make this request in writing to our Privacy Officer.

You may have the right to have the Faculty Clinician amend your Protected Health Information. This means you may request an amendment of Protected Health Information about you in a designated record set for as long as we maintain this information. In certain cases, we may deny your request for an amendment. If we deny your request for amendment, you have the right to file a statement of disagreement with us and we may prepare a rebuttal to your statement and will provide you with a copy of any such rebuttal. Please contact our Privacy Officer to determine if you have questions about amending your medical record.

You have the right to receive an accounting of certain disclosures we have made, if any, of your Protected Health Information. This right applies to disclosures for purposes other than treatment, payment or healthcare operations as described in this Notice of Privacy Practices. It excludes disclosures we may have made to you, for a facility directory, to family members or friends involved in your care, or for notification purposes. You have the right to receive specific information regarding these disclosures that occurred after

April 14, 2003. You may request a shorter timeframe. The right to receive this information is subject to certain exceptions, restrictions and limitations.

You have the right to obtain a paper copy of this notice from us, upon request, even if you have agreed to accept this notice by reading it where it is posted or by receiving it electronically.

A.3 Complaints

You may complain to us or to the Secretary of Health and Human Services if you believe we have violated your privacy rights by us. You may file a complaint with us by notifying our Privacy Officer and complete a complaint and resolution form. We will not retaliate against you for filing a complaint.

You may contact our Privacy Officer, Joseph M. LaCava at 5013214844 for further information about the complaint process.

This notice was published and becomes effective on April 14, 2015.

Summary of Notice of Privacy Practices

This summary is provided to assist you in understanding the Full Notice of Privacy Practices

This attached Notice of Privacy Practices contains a detailed description of how Joseph M LaCava DPM, PA will protect your health Information, your rights as a patient and our common practices in dealing with patient health information. Please refer to that Notice for further health information.

Uses and Disclosures of Health Information We will use and disclose your health information in order to treat you or to assist other health care providers in treating you. We will also use and disclose your health information in order to obtain payment for our services or to allow insurance companies to process insurance claims for services rendered to you by us or other health care providers. Finally we may disclose your health information for certain limited operational activities such as quality assessment, licensing, accreditation and training of students.

Uses and Disclosures Based on Your Authorization Except as stated in more detail in the Notice of Privacy Practices, we will not use or disclose your health information without your written authorization.

Uses and Disclosures Not Requiring Your Authorization In the following circumstances, we may disclose your health information without your written authorization:

- To family members or close friends who are involved in your health care
- For certain limited research purposes
- For purposes of Public Health and safety
- To government agencies for purposes of their audits, investigations and oversight activities.
- To government authorities to prevent child abuse or domestic violence
- To the FDA to report product defects or incidents
- To law enforcement authorities to protect public safety or to assist in apprehending criminal offenders
- When required by court orders, search warrants, subpoenas and as otherwise required by law

Patient Rights As our patient, you have the following rights:

- To have access to and/or a copy of your health information

- To receive an accounting of certain disclosures we have made of your health information
- To request restrictions as to how your health information is used or disclosed
- To request that we communicate with you in confidence
- To request that we amend your health information
- To receive notice of our privacy practices

If you have questions, concern or complaint regarding our privacy practices, please refer to *Joseph M LaCava DPM, PA's Notice of Privacy Practices* for the person or persons whom you may contact.

Patient's Bill Of Rights

A patient should expect and receive from doctors entrusted with the responsibility of delivering medical care, consideration of their basic rights as human beings to independence of expression, decisions and actions; and concern and respect for their personal dignity at all times.

The following patient's rights are an integral part of the Joseph M LaCava DPM, PA Code of Professional Ethics and the patient should be advised of these rights by his/her Faculty Clinician.

1. The patient has the right to impartial access to medical care without regard to race; sex; cultural, national or ethnic origins; economic, educational, religious or political affiliation; and without having to disclose the source of payment for his/her care.
2. The patient has the right to be interviewed and examined in surroundings that permit reasonable visual and auditory privacy. Individuals not directly involved in his/her care will not be present without the patient's permission. The patient has the right to be advised of the presence of any individual during consultation and/or care and the reason for their presence.
3. The patient has the right to have a person of his/her sex present during certain physical examinations by a faculty clinician/intern of the opposite sex and the right not to remain disrobed any longer than is required for accomplishing the examination for which the patient was asked to disrobe.
4. The patient should know the identity and professional status of individual(s) providing service to him/her and to know who has the primary responsibility for coordinating his/her care. This includes the right to know the professional relationships among individuals who are caring for his/her as well as the relationship to any other health care or educational institution involved in his/her case.
5. The patient has the right to expect information from the doctor coordinating his/her care concerning the diagnosis/analysis, prognosis and the planned course of care in terms that the patient is able to understand. When it is not clinically advisable to give such information to the patient, the information should be made available to a legally authorized representative of the patient.
6. The patient has the right to actively participate in any and all decisions regarding his/her care. To the extent permissible by applicable law, this will include the right to refuse care even after being informed of possible adverse consequences of his/her decision. When a patient or his/her legally authorized representative refused procedures which prevent the

- doctor from providing care in accordance with professional standards, the relationship with the patient may be terminated upon reasonable notice.
7. The patient has the right not to be subjected to any procedure(s) without voluntary consent or the consent of his/her legally authorized representative. When alternatives to care exist, the patient can be expected to be informed of these alternatives.
 8. The patient has the right to expect confidential care of all communications and records pertaining to his/her care. The patient also has the right to have his/her health care record read only by individuals directly involved in his/her care or in monitoring of its quality and by other individuals only on the patient's written authorization or that of his/her legally authorized representative. Written permission shall be obtained before health care records are made available to anyone not directly concerned with the patient's care.
 9. The patient has the right to leave or voluntarily be discharged from medical care even against the best advice of the attending doctor.
 10. A patient can expect reasonable continuity of care. He/she shall be informed in advance of the time(s) and location(s) of appointments as well as the name and capacity of the student clinician/health practitioner who will be providing care.
 11. A patient has the right to be advised if the doctor and/or other attending physicians or other concomitant health care personnel propose to engage in or otherwise perform human experimentation affecting his/her care. The patient has the privilege and right of refusing to participate in any research project. Participation by patient in clinical training programs or in the gathering of data for research purposes should always and everywhere be voluntary.
 12. The patient has the right to be informed of continuing health care requirements following discharge from care in the out-patient or inpatient setting.
 13. The patient has the right, upon request, to receive an itemized, detailed and thorough explanation of total charges billed for services rendered, regardless of the source of payment. The patient has the right to timely notice prior to termination of his/her eligibility for reimbursement by any third-party payer for the cost of his/her care.
 14. The patient shall be advised of his/her rights and shall be instructed as to the rules and policies which apply to his/her conduct as a patient in the out-patient and/or in-patient setting.
 15. The patient shall have all his/her rights also applied to the person or persons who may assume the legal responsibility to make decisions on the

patient's behalf regarding the care of the patient should the patient be a legal minor or otherwise incapacitated.

16. The patient has the right to expect reasonable safety insofar as the health care environment is concerned.
17. The patient, at his/her own request and expense, has the right to consult with another health care practitioner.

PATIENT RESPONSIBILITIES

1. **Provision of Information:** A patient has the responsibility to provide, to the best of his/her ability and knowledge, accurate and complete information about present complaints, past illnesses, accidents, hospitalizations, medications, and other matters relating to his/her health. It is the patient's responsibility to report any new episode of trauma or any unexpected changes in his/her health condition to the practitioner. The patient is responsible for letting the student clinician and supervising Faculty Clinician know if he/she does not fully comprehend the practitioner's contemplated course of care.
2. **Compliance with Instructions:** A patient is responsible for following the care plan recommended by the practitioner primarily responsible for his/her care. The patient is responsible for keeping appointments and, when unable to do so, for notifying the practitioner or his/her office.
3. **Refusal of Care:** The patient is responsible for the consequences if he/she refuses care or does not follow the practitioner's instructions.
4. **Charges:** The patient is responsible for assuring that the financial obligations of his/her health care are fulfilled as promptly as possible.
5. **Clinic Rules and Regulations:** The patient is responsible for following clinic rules and regulations affecting patient care and conduct.
6. **Respect and Consideration:** The patient is responsible for being considerate of the rights of other patients. He/she is also responsible for being respectful of the property of other persons and of the offices and environment in which care is rendered.

FREEDOM OF CHOICE

Joseph M LaCava DPM, PA shall recognize the right of the patient to elect his/her own method of health care. Joseph M LaCava DPM, PA shall also respect the patient's right to change his/her choice of providers at will. This may be separate, concomitant or complementary to care where co-operation with another provider may be required and concurrent procedures do not conflict.

Joseph M LaCava DPM, PA should ensure that patients possess enough information to enable the patient to make an informed intelligent decision with regard to any proposed care.

CONSULTATION AND REFERRAL

In difficult or protracted cases, consultation(s) with other health care providers are recommended and advisable. Having requested the opinion, Joseph M LaCava DPM, PA shall make available any relevant information and indicate clearly whether he/she wishes the colleague to continue care of the patient.

Joseph M LaCava DPM, PA shall be ready to act upon a patient's expressed desire for a consultation with another doctor or provider even though he/she may not feel the need for consultation.

Joseph M LaCava DPM, PA shall, when his/her opinion has been requested by a colleague, report in detail his/her findings and recommendations to the colleague and may outline his/her opinion to the patient. He/she will continue with the care of the patient only at the specific request of the attending doctor or health care provider, and with the consent of the patient.

Joseph M LaCava DPM, PA shall make available at a patient's request a report of his/her findings and a description of his/her care of the patient. (Administrative fees apply.)

REMUNERATION

The health and welfare of the patient should always be paramount and expectation of remuneration or lack thereof shall not in any way affect the quality of service rendered to the patient.

Joseph M LaCava DPM, PA is entitled to receive proper and reasonable compensation for professional services rendered compared to the fees commonly assessed in the community by other members of the profession based on usual and customary practices, experience, time, reputation, the nature of the patient's condition and the patient's ability to pay. Joseph M LaCava DPM, PA should be prepared to discuss fees with individual patients and should initiate discussion when fees are expected to exceed usual and customary charges.

Joseph M LaCava DPM, PA should support proper activities designed to access necessary care on behalf of individuals who are unable to pay reasonable fees or who are otherwise legally destitute.