REFERENCES FOR OPIOID ALGORITHM:


HIPAA NOTICE OF PRIVACY PRACTICES

PUBLIC NOTICE OF PRIVACY PRACTICES:

Cordant Health Solutions (Sterling) has created this Notice of Privacy Practices (Notice) in order to demonstrate and communicate our firm commitment to abide by HIPAA and this Notice. Cordant reserves the right to change the terms of this Notice and to make the new provisions effective for all protected health information (PHI) that it maintains. Cordant will provide individuals with a revised Notice on its Website at www.cordanths.com. Cordant maintains administrative, physical, and technical safeguards to ensure PHI is protected.

HIPAA COMPLIANCE:

Cordant is fully committed to compliance with all requirements of HIPPA (45 Code of Federal Regulations (C.F.R.) Parts 160 and 164, subparts A and E (Privacy Rule) and 45 C.F.R. Part 164, subparts A and C (Security Rule) for the Administrative Simplification provisions of Title II, Subtitle F of the Health Insurance Portability and Accountability Act of 1996, as amended by any other statute, rule and/or regulation, including Title XIII of the American Recovery and Reinvestment Act of 2009: the Health Information Technology for Economic and Clinical Health Act (HITECH)). Cordant is required to provide notice of legal duties and its privacy practices.

SOURCES OF PHI:

In providing laboratory testing services, we obtain PHI from the following sources:

1. Information from health care providers who are currently treating or have previously treated the patient.

2. Information from insurance companies that currently insure or have insured the patient in the past.

3. Information obtained in the course of providing laboratory services as well as through any indirect laboratory testing performed at the request of an affiliate/referring laboratory.

CORDANTEMPLOYEES:

Cordant’s employees understand the need to maintain PHI in the strictest of confidence.
Cordant has created HIPAA Privacy and Security Policies and Procedures to guide its employees and Representatives on complying with all requirements of HIPAA. Employees and Representatives are trained on HIPAA privacy and security regulations and required to abide by all requirements of HIPAA. Employees are also subject to disciplinary action, up to and including termination, if they violate such requirements.

**USE AND DISCLOSURE OF PHI:**

Cordant will request authorization from the patient or the patient’s personal representative before disclosing his or her PHI, unless covered by an exception, as stated below. If a patient has provided an authorization, he or she is permitted to revoke that authorization at any time in writing. Such revocations are abided, except to the extent that Cordant may have already taken action in reliance upon the original authorization.

**NO AUTHORIZATION REQUIRED FORUSES AND DISCLOSURES OF PHI:**

Cordant is permitted to use or make disclosures of PHI without prior written authorization for purposes of treatment, payment, or health care operations. For example, Cordant may use PHI for appointment reminders, to provide information on treatment alternatives, or to submit to insurance payers for payment for services. Below is a list of instances where prior authorization is not required, in addition to the treatment, payment, or health care operation purposes; this is not meant to be an all-inclusive list. A determination will be made by Cordant based on all the facts and circumstances. It may be necessary to use or disclose PHI for the purposes described herein even after the patient/client has been terminated; therefore, Cordant does not automatically destroy PHI upon the termination of a patient/client relationship.

**CORDANT MAY DISCLOSE PHI WITHOUT AUTHORIZATION WHEN THE INFORMATION IS NEEDED FOR:**

- Public health reporting requirements;
- Military requirements;
- National security, intelligence activities, or for the protection of public officials;
- Department of Labor, Department of Health and Human Services (HHS), health oversight agencies or his or her contractors for activities such as audits, investigations, licensures, disciplinary actions or civil, administrative or criminal proceedings which are necessary for the government to oversee the health care system, government benefits programs for compliance with standards, and compliance with civil rights laws;
- Licensure and/or state or government agency, survey or audit requirements;
• Court, Administrative and Agency proceedings in response to a valid subpoena, court order, discovery request, or other lawful process or litigation as appropriate;
• Correctional institution or law enforcement agencies;
• Laws relating to workers’ compensation or similar programs claim proceedings;
• Emergencies and the identification of deceased individuals;
• Certain approved research purposes;
• Organ donation;
• For use by coroners, medical examiners and funeral directors; and
• As otherwise required or permitted by law.

CORDANT’S BUSINESS ASSOCIATES:

In situations where a third party is contracted to perform services on behalf of Sterling, and in that service the contractor has access or comes into contact with PHI, the third party is bound to protect the privacy of PHI and use it only as required to perform those services and as otherwise permitted by law. No authorization is required from the patient or the patient’s personal representative before disclosing or using the PHI.

CORDANT MAY USE OR DISCLOSE PHI WITH AUTHORIZATION:

Below is a list of instances where prior authorization is required; this is not meant to be an all-inclusive list.

• Disclosures of PHI to the patient or the patient’s personal representative;
• Uses or disclosures of PHI for employment determinations;
• Uses and disclosures of PHI for marketing purposes, including subsidized treatment communications; and
• Disclosures that constitute a sale of PHI.

PATIENT’S LEGAL RIGHTS RELATED TO PHI:

Restricting PHI: Patients have the right to request restrictions on the use and disclosure of PHI for treatment, payment or health care operations purposes, as described above. Cordant will consider each request, but is not required to agree to most restrictions.
Patients have the right to request restrictions on the disclosure of PHI to health plans and insurance payers for payment or health care operations, provided that the patient has paid for the healthcare service in full and out of pocket. Unlike other restriction requests, Cordant Health Solutions must agree to this restriction request unless the disclosure is otherwise required by law.

**Accounting of Disclosures of PHI:** Patients have the right to request to receive an accounting of certain disclosures of PHI made by Sterling. The Accounting does not include disclosures made for purposes of treatment, payment or health care operations.

**Inspection and Access to PHI:** Patients have the right to request to inspect or obtain a copy of any PHI that Cordant creates or maintains. Cordant may charge a minimal fee to cover the cost of providing copies of any PHI. **Please note, however, both federal and state laws, in most circumstances, prohibit Cordant from disclosing laboratory test results directly to patients, subject to limited state law exceptions.** If the request for PHI is for a laboratory test result and does not fit within such exceptions, Cordant will refer the patient to the provider that ordered the laboratory services in order to obtain a copy of his or her PHI.

**Confidential Communications of PHI:** Patients have the right to receive confidential communications of PHI. For example, the patient can ask that Cordant only contact him or her at work or by mail. Cordant will not ask the patient the reason for the request and will accommodate all reasonable requests. Requests must specify how or where the patient wishes to be contacted.

**Amending PHI:** Patients have the right to amend PHI, which is included in Cordant’s records (called a designated record set). Cordant may deny a request following a determination that Cordant’s records are accurate and complete, the information was not created by Sterling, the information is not contained in Cordant’s designated record set, or if access is otherwise restricted by law.

**Breach of unsecured PHI:** Cordant is required to notify the patient in writing of any breach of his or her unsecured PHI.

**Paper copy of this Notice:** The patient has a right to obtain a paper copy of this Notice from Cordant upon request.
If a patient wishes to exercise any of the legal rights described above, he or she must do so in writing at: 12015 East 46th Ave, Suite 650, Denver, CO 80239. Please contact Cordant Health Solutions at 1-800-282-6574 to obtain the appropriate request form. All questions should be directed to Compliance@cordanths.com or 1-877-648-5279.

COMPLAINTS:

Any person who feels that his or her privacy rights have been violated is asked to file a complaint with Cordant’s Chief Compliance Officer. All complaints must be submitted in writing at: 12015 East 46th Avenue, Suite 650, Denver, CO, 80239. Questions about filing a complaint should also be directed to Compliance@cordanths.com or 1-877-648-5279. Complaints may also be made to the U.S. Secretary of Health and Human Services, who is responsible for overseeing compliance with federal privacy law. Cordant will not retaliate against any current or future patient who wishes to file a complaint.

NOTICE OF CORDANT’S PRIVACY POLICY:

Cordant reserves the right to change the terms of its HIPAA Privacy and Security Policies and Procedures and this Notice whenever necessary to reflect changes or interpretations of the law. Cordant may change these documents periodically and without prior notice.

DISCLAIMER OF LIABILITY:

Neither Cordant Health Solutions nor any of its employees or Representatives make any warranty, express or implied, or assume any legal liability or responsibility for the accuracy, completeness, or usefulness of any information contained within this Notice. Any questions or comments about this Notice please call Cordant’s Chief Compliance Officer at 1-877-648-5279.