

NOTICE OF PRIVACY PRACTICES

**NORTHERN ARIZONA INTERGOVERNMENTAL PUBLIC TRANSPORTATION
AUTHORITY (NAIPTA)**

Danelle Knight, HIPAA Officer, (928) 679-8926

Effective Date: August 1, 2017

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.

We understand the importance of privacy and are committed to maintaining the confidentiality of your medical information. We use these records to provide or enable the ADA Specialist to make eligibility determinations for our Paratransit transportation and Reduced Fair Programs. The medical information is obtained to determine the rates for payment of transportation services to you as allowed by the American with Disabilities Act of 1990 and Civil Rights Bill. We are required by law to maintain the privacy of protected health information, to provide individuals with notice of our legal duties and privacy practices with respect to protected health information, and to notify affected individuals following a breach of unsecured protected health information. This notice describes how we may use and disclose your medical information. It also describes your rights and our legal obligations with respect to your medical information. If you have any questions about this Notice, please contact our HIPAA Officer listed above.

TABLE OF CONTENTS

- 1. How Mountain Lift-Paratransit and Reduced Fair Programs May Use or Disclose Your Health Information
- 2. When Mountain Line Paratransit and Reduced Fair Programs May Not Use or Disclose Your Health Information
- 3. Your Health Information Rights
.....
 - a. Right to Request Special Privacy Protections
 - b. Right to Request Confidential Communications
 - c. Right to Inspect and Copy
 - d. Right to Amend or Supplement
 - e. Right to an Accounting of Disclosures
 - f. Right to a Paper or Electronic Copy of this Notice
- 4. Changes to this Notice of Privacy Practices
.....
- 5. Complaints.

A. How Mountain Lift-Paratransit and Reduced Fair Programs May Use Your Health Information

The application process is used to collect health information about you and stored in a locked file cabinet. This is your medical record. The medical record is the property of NAIPTA, but the information in the medical record belongs to you. The law permits us to use or disclose your health information for the following purposes:

1. Payment. We use medical information about you to determine the appropriate rate for payment of the services we provide.
2. Mountain Line Paratransit and Reduced Fair Programs Operations. We may use medical information about you to operate this transportation business. For example, we may use this information to review and improve the quality of service we provide, or the competence and qualifications of our staff.
3. Scheduled Pick-up Reminders. We have an automated system that will call day prior to remind client of scheduled pick up to specify who is traveling, estimated time of pick up, location of errand. The automated message may include medical appointment information which could be left on an answering machine if you are not at home or in a message left with the person answering the phone.
4. Notification and Communication with Family. If an incident should occur while Mountain Lift Paratransit or the Reduced Fair program transportation or, in the event of your death, NAIPTA will call 911.
5. Sale of Health Information. We will not sell your health information without your prior written authorization.
6. Required by Law. As required by law, we will use your health information, but we will limit our use to the relevant requirements of the law. When the law requires us to report abuse, neglect or domestic violence, or respond to judicial or administrative proceedings, or to law enforcement officials, we will further comply with the requirement set forth below concerning those activities.
7. Public Health. We may, and are sometimes required by law, to disclose your health information to public health authorities for purposes related to: preventing or controlling disease, injury or disability; reporting child, elder or dependent adult abuse or neglect; reporting domestic violence; reporting to the Food and Drug Administration problems with products and reactions to medications; and reporting disease or infection exposure. When we report suspected elder or dependent adult abuse or domestic violence, we will inform you or your personal representative promptly unless in our best professional judgment, we believe the notification would place you at risk of serious harm or would require informing a personal representative we believe is responsible for the abuse or harm.
8. Judicial and Administrative Proceedings. We may, and are sometimes required by law, to disclose your health information in the course of any administrative or judicial proceeding to the extent expressly authorized by a court or administrative order. We may also disclose information about you in response to a subpoena, discovery request or other

lawful process if reasonable efforts have been made to notify you of the request and you have not objected, or if your objections have been resolved by a court or administrative order.

9. Law Enforcement. We may, and are sometimes required by law, to disclose your health information to a law enforcement official for purposes such as identifying or locating a suspect, fugitive, material witness or missing person, complying with a court order, warrant, grand jury subpoena and other law enforcement purposes.
10. Coroners. We may, and are often required by law, to disclose your health information to coroners in connection with their investigations of deaths.
11. Public Safety. We may, and are sometimes required by law, to disclose your health information to appropriate persons in order to prevent or lessen a serious and imminent threat to the health or safety of a particular person or the general public.
12. Specialized Government Functions. We may disclose your health information for military or national security purposes or to correctional institutions or law enforcement officers that have you in their lawful custody.
13. Change of Ownership. In the event that this transportation business is sold or merged with another organization, your health information/record will become the property of the new owner, although you will maintain the right to request that copies of your health information.
14. Breach Notification. In the case of a breach of unsecured protected health information, we will notify you as required by law. If you have provided us with a current e-mail address, we may use e-mail to communicate information related to the breach. In some circumstances, our business associate may provide the notification. We may also provide notification by other methods as appropriate.

B. When Mountain Lift-Paratransit and Reduced Fair Programs May Not Use Your Health Information

Except as described in this Notice of Privacy Practices, NAIPTA will, consistent with its legal obligations, not use or disclose health information which identifies you without your written authorization. If you do authorize NAIPTA to use or disclose your health information for another purpose, you may revoke your authorization in writing at any time.

C. Your Health Information Rights

1. Right to Request Special Privacy Protections. You have the right to request restrictions on certain uses your health information by a written request specifying what information you want to limit, and what limitations on our use or disclosure of that information you wish to have imposed. We reserve the right to accept or reject any other request, and will notify you of our decision.
2. Right to Request Confidential Communications. You have the right to request that you receive your health information in a specific way or at a specific location. For example, you may ask that we send information to a particular e-mail account or to your work address. We will comply with all reasonable requests submitted in writing which specify how or where you wish to receive these communications.
3. Right to a Paper or Electronic Copy of this Notice. You have a right to notice of our legal duties and privacy practices with respect to your health information, including a right to a paper copy of this Notice of Privacy Practices, even if you have previously requested its receipt by e-mail. If you would like to have a more detailed explanation of these rights or if you would like to exercise one or more of these rights, contact our HIPAA Officer listed at the top of this Notice of Privacy Practices.

D. Changes to this Notice of Privacy Practices

We reserve the right to amend this Notice of Privacy Practices at any time in the future. Until such amendment is made, we are required by law to comply with the terms of this Notice currently in effect. After an amendment is made, the revised Notice of Privacy Protections will apply to all protected health information that we maintain, regardless of when it was created or received. We will keep a copy of the current notice with the Mountain Lift Paratransit and Reduced Fare applications at the front desk and on our Mountain Line Website.

E. Complaints

Complaints about this Notice of Privacy Practices or how NAIPTA handles your health information should be directed to our HIPAA Officer listed at the top of this Notice of Privacy Practices.

If you are not satisfied with the manner in which this office handles a complaint, you may submit a formal complaint to:

Michael Leoz, Regional Manager-Pacific Region
U.S. Department of Health and Human Services Office of Civil Rights
90 7th Street, Suite 4-100, San Francisco, CA 94103
Customer Response Center: 1-800-368-1019
Fax: 202-619-3818
TDD: 800-537-7697
OCRMail@hhs.gov

The complaint form may be found at: <https://www.hhs.gov/hipaa/filing-a-complaint/complaint-process/index.html>

You will not be penalized in any way for filing a complaint.