



# DOVETAIL

ADVOCACY FOR OLDER ADULTS

## **Dovetail Advocacy for Older Adults, LLC**

### **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.**

**Dovetail Advocacy for Older Adults, LLC** (hereinafter referred to as "Dovetail Advocacy") is required by law to maintain the privacy of your health information, to provide to you (or your representative) this Notice of our duties and privacy practices, and to notify you (or your representative) following a breach of your unsecured health information. Dovetail Advocacy is required to abide by the terms of this Notice as may be amended from time to time. Dovetail Advocacy reserves the right to change the terms of this Notice. Any revisions to this Notice will be effective for all health information that Dovetail Advocacy has created or maintained in the past, and for any records that Dovetail Advocacy creates or maintains in the future. Dovetail Advocacy will post our current Notice on our website.

#### **USE AND DISCLOSURE OF HEALTH INFORMATION**

**THE FOLLOWING IS A SUMMARY OF THE CIRCUMSTANCES UNDER WHICH AND THE PURPOSES FOR WHICH DOVETAIL ADVOCACY MAY USE OR DISCLOSE YOUR HEALTH INFORMATION:**

**To Provide Treatment.** Dovetail Advocacy may use or disclose your health information to treat you and coordinate your care within Dovetail Advocacy.

**To Obtain Payment.** Dovetail Advocacy may use or disclose your health information to bill or collect payment from third parties for the services or items you receive from Dovetail Advocacy.

**To Conduct Health Care Operations.** Dovetail Advocacy may use or disclose your health information for our own operations in order to facilitate the functions of Dovetail Advocacy and as necessary to provide quality care to all of Dovetail Advocacy's clients. Dovetail Advocacy may disclose your health information to a health oversight agency performing activities authorized by law, such as investigations or audits. These agencies include governmental agencies that oversee the health care system, government benefit programs, and organizations subject to government regulation and civil rights laws. In addition, Dovetail Advocacy may disclose your health information to another health care provider subject to Federal privacy protection laws, as long as the provider has or has had a relationship with you and the information is for that provider's health care operations.

**To Inform You About Information That May Be of Interest to You.** Dovetail Advocacy may use or disclose your health information to tell you about or recommend possible options or alternatives for treatment, or to inform you of other information that may be of interest to you.

**Release of Information to Family/Friends.** Unless you specifically request in writing that Dovetail Advocacy not communicate with such person(s), Dovetail Advocacy may release your health information to a family member or friend who is involved in your treatment or who is helping pay for your care.

**Business Associates.** Dovetail Advocacy may disclose your health information to our business associates that perform functions on our behalf or provide us with services if the information is necessary for them to provide such functions or services. Dovetail Advocacy requires our business associates to agree in writing to protect the privacy of your health information and to use and disclose your health information only as specified in that written agreement.

**Health Information Exchanges.** Dovetail Advocacy may participate in an arrangement of health care organizations that have agreed to work with each other to facilitate access to health information that may be relevant to your care. For example, if you are admitted on an emergency basis to a hospital that participates in the exchange and you cannot provide important information about your condition, the arrangement will allow the hospital to access the health information Dovetail Advocacy maintains about you to treat you at the hospital.

**THE FOLLOWING IS A SUMMARY OF THE OTHER CIRCUMSTANCES UNDER WHICH AND THE OTHER PURPOSES FOR WHICH DOVETAIL ADVOCACY MAY USE OR DISCLOSE YOUR HEALTH INFORMATION WITHOUT YOUR WRITTEN CONSENT OR AUTHORIZATION:**

**When Legally Required.** Dovetail Advocacy will disclose your health information to the extent that it is required to do so by any Federal, State or local law.

**When There Are Risks to Public Health.** Dovetail Advocacy may disclose your health information for the following public activities and purposes:

- To prevent or control disease, injury or disability, report disease, injury, vital events such as death, and the conduct of public health surveillance, investigations and interventions.
- To report adverse events, product defects, to track products or enable product recalls, repairs and replacements, and to conduct post-marketing surveillance and compliance with requirements of the Food and Drug Administration.
- To notify a person who has been exposed to a communicable disease or who may be at risk of contracting or spreading a disease.
- To an employer about an individual who is a member of the workforce, as legally required.

**To Report Abuse, Neglect Or Domestic Violence.** Dovetail Advocacy is allowed to notify government authorities if Dovetail Advocacy reasonably believes a client is the victim of abuse,

neglect or domestic violence. Dovetail Advocacy will make this disclosure only when specifically required or authorized by law or when you authorize the disclosure.

**To Conduct Health Oversight Activities.** As permitted or required by State law, Dovetail Advocacy may disclose your health information to a health oversight agency for activities such as audits, civil, administrative or criminal investigations, inspections, and licensure or disciplinary action. If, however, you are the subject of a health oversight investigation, Dovetail Advocacy may disclose your health information only if it is directly related to your receipt of health care or public benefits.

**In Connection With Judicial And Administrative Proceedings.** As permitted or required by State law, Dovetail Advocacy may disclose your health information in the course of any judicial or administrative proceeding in response to an order of a court or administrative tribunal as expressly authorized by such order. Under certain conditions, Dovetail Advocacy also may disclose your health information in response to a subpoena, discovery request or other lawful process.

**For Law Enforcement Purposes.** As permitted or required by State law, Dovetail Advocacy may disclose your health information to a law enforcement official for certain law enforcement purposes, including, under certain limited circumstances, if you are a victim of a crime or in order to report a crime.

**To Coroners And Medical Examiners.** Dovetail Advocacy may disclose your health information to coroners and medical examiners for purposes of determining cause of death or for other duties, as authorized by law.

**To Funeral Directors.** Dovetail Advocacy may disclose your health information to funeral directors consistent with applicable law and, if necessary, to carry out their duties with respect to your funeral arrangements. If necessary to carry out their duties, Dovetail Advocacy may disclose your health information prior to and in reasonable anticipation of your death.

**In the Event of A Serious Threat To Health Or Safety.** Dovetail Advocacy may, consistent with applicable law and ethical standards of conduct, disclose your health information if Dovetail Advocacy, in good faith, believes that such disclosure is necessary to prevent or lessen a serious and imminent threat to your health or safety or to the health and safety of the public.

**For Worker's Compensation.** Dovetail Advocacy may release your health information for worker's compensation or similar programs.

#### **AUTHORIZATION TO USE OR DISCLOSE HEALTH INFORMATION**

Other than is stated above, Dovetail Advocacy will not use or disclose your health information other than with your written authorization. Your authorization (or the authorization of your representative) is specifically required before Dovetail Advocacy: (i) uses or discloses your psychotherapy notes; (ii) uses your health information to make a marketing communication to you for which it received financial remuneration from a third party, unless such communication is face-to-face or in other limited circumstances; or (iii) discloses your health information in any manner that constitutes the sale of such information under HIPAA. Also, some types of health information are particularly sensitive and the law, with limited exceptions, may require that Dovetail Advocacy

obtain your authorization to use or disclose that information. Sensitive information may include information dealing with genetics, HIV/AIDS, mental health, developmental disabilities, and alcohol and substance abuse. If required by law, Dovetail Advocacy will ask that you (or your representative) sign an authorization before we use or disclose such information. If you (or your representative) authorize Dovetail Advocacy to use or disclose your health information, you (or your representative) may revoke that authorization in writing at any time, except to the extent that it has already been acted upon.

### **YOUR RIGHTS WITH RESPECT TO YOUR HEALTH INFORMATION**

You have the following rights regarding your health information that Dovetail Advocacy maintains:

**Right to Receive Confidential Communications.** You (or your representative) have the right to request that Dovetail Advocacy communicates with you about your health and related issues in a particular manner or at a certain location. For instance, you (or your representative) may ask that Dovetail Advocacy only communicate with you pertaining to your health information privately with no other family members present. All requests for confidential communications must be made in writing using the appropriate Dovetail Advocacy form. This form can be requested by contacting Dovetail Advocacy's Owner at 262-264-8927. Dovetail Advocacy will accommodate reasonable requests. You (or your representative) will not be required to give a reason for your request.

**Right to Request Restrictions.** You (or your representative) have the right to request restrictions on certain uses and disclosures of your health information. For example, you (or your representative) have the right to request a limit on Dovetail Advocacy's disclosure of your health information to someone who is involved in your care or the payment of your care. All requests for restrictions must be made in writing using the appropriate Dovetail Advocacy form. This form can be requested by contacting Dovetail Advocacy's Owner at 262-264-8927.

Dovetail Advocacy is not required to agree to your request; however, if we do agree, we are bound by that agreement except when otherwise required by law or in emergencies. Except as otherwise required by law, Dovetail Advocacy must agree to a restriction if: (1) the disclosure is to a health plan for purposes of carrying out payment or health care operations (and not for purposes of carrying out treatment); and (2) the health information pertains solely to a health care item or service for which Dovetail Advocacy has been paid out of pocket, in full, by you or someone else on your behalf (not the health plan). If you self-pay and request a restriction, it will apply only to those health records created on the date that you received the item or service for which you, or another person (other than the health plan) on your behalf, paid in full, and which document the item or service provided on such date.

**Right to Inspect and Copy Your Health Information.** You (or your representative) have the right to inspect and copy your health information, including billing records. All requests to inspect and copy records must be made in writing using the appropriate Dovetail Advocacy form. This form can be requested by contacting Dovetail Advocacy's Owner at 262-264-8927. If you (or your representative) request a copy of your health information, Dovetail Advocacy will provide you (or your representative) copies of your health information in the format you requested unless we cannot practicably do so. Dovetail Advocacy may charge a reasonable fee for copying and

assembling costs associated with your request. Dovetail Advocacy may deny your request to inspect and/or copy your health information in certain limited circumstances. If Dovetail Advocacy denies your request, you (or your representative) may request that we provide you with a review of our denial. Reviews will be conducted by a licensed professional who we have designated as a reviewing official, and who did not participate in the original decision to deny the request.

**Right to Amend Your Health Information.** If you (or your representative) believe that your health information is incorrect, you (or your representative) have the right to request that Dovetail Advocacy amend your records. That request may be made as long as Dovetail Advocacy still maintains your records and it must include a reason for the request. All requests for amendment must be made in writing using the appropriate Dovetail Advocacy form. This form can be requested by contacting Dovetail Advocacy's owner at 262-264-8927.

Dovetail Advocacy may deny the request if it is not in writing or does not include a reason for the amendment. The request may also be denied if the requested amendment pertains to health information that was not created by Dovetail Advocacy, if the records you are requesting to amend are not part of Dovetail Advocacy's records, if the health information you wish to amend is not part of the health information you (or your representative) are permitted to inspect and copy, or if, in the opinion of Dovetail Advocacy, the records containing your health information are accurate and complete.

**Right to an Accounting.** You (or your representative) have the right to request an accounting of disclosures of your health information made by Dovetail Advocacy for certain purposes, which may include disclosures authorized by law. All requests for accounting must be made in writing using the appropriate Dovetail Advocacy form. This form can be requested by contacting Dovetail Advocacy's Owner at 262-264-8927

The request should specify the time period for the accounting, which may not be in excess of six years. Dovetail Advocacy will provide the first accounting you request during any 12-month period without charge. Subsequent accounting requests may be subject to a reasonable cost-based fee.

**Right to a Paper Copy of this Joint Notice.** You (or your representative) have a right to a separate paper copy of this Joint Notice at any time even if you (or your representative) have received this Joint Notice previously. To obtain a copy, please contact Dovetail Advocacy's Owner at 262-264-8927.

**Right to a Breach Notification.** You (or your representative) have a right to be notified of any breach of your unsecured health information. Notification of a breach may be delayed or not provided if so required by a law enforcement official. If you are deceased and there is a breach of your health information, the notice will be provided to your next of kin or personal representative if Dovetail Advocacy knows the identity and address of such individual.

## **CONTACT PERSON**

Dovetail Advocacy has designated Dovetail Advocacy's Privacy Officer as its contact person for all issues regarding client privacy and your rights under the Federal privacy standards. You may contact this person at:

Privacy Officer  
Dovetail Advocacy for Older Adults, LLC  
3215 Golf Road Unit 125  
Delafield, WI 53018  
262-264-8927

## **CONCERNS AND COMPLAINTS**

You (or your representative) have the right to express complaints to Dovetail Advocacy or to the Secretary of Health and Human Services if you (or your representative) believe that your privacy rights have been violated. Any complaints to Dovetail Advocacy should be made in writing to the: Dovetail Advocacy Privacy Officer at Dovetail Advocacy for Older Adults, LLC, 3215 Golf Road Unit 125, Delafield, WI 53018. Dovetail Advocacy encourages you to express any concerns you may have regarding the privacy of your information. You will not be retaliated against in any way for expressing your concerns or filing a complaint.

## **EFFECTIVE DATE**

This Notice is effective July 27, 2023.