



GoSignMeUp

Notice of Privacy Practices Policy

Policies and Forms That Conform to HIPAA Privacy Rule

Table 1 – Revision History

Version	Date	Author	Description of Change
2.0	October 2014	Jaime Baxter	Privacy Policy Created

Table 2 – Assigned Responsibility

Name	Title	Phone	Email Address
Tanja Morrison	Privacy Official	949-951-8701	Tanja@gosignmeup.com

Scope

<input checked="" type="checkbox"/> Entire Workforce	<input type="checkbox"/> Faculty/Staff	<input type="checkbox"/> Student Clinicians
<input type="checkbox"/> Volunteers	<input type="checkbox"/> Agents	<input type="checkbox"/> Other
<input type="checkbox"/> Executive Team	<input type="checkbox"/> Security Team	<input type="checkbox"/> Other

Purpose

A Covered Entity has a legal duty to protect the privacy of Protected Health Information (PHI). The Health Insurance Portability and Accountability Act (HIPAA) requires each individual with whom a Direct Treatment Relationship exists be provided with notice of their rights with respect to his/her PHI and the privacy practices of the Covered Entity¹. The notice is referred to as a Notice of Privacy Practices (NPP). The NPP must inform individuals of:

- How GoSignMeUp will use and disclosure an individual's PHI;
- The individual's rights and responsibilities with respect to his/her PHI; and
- GoSignMeUp's duties with respect to an individual's PHI².

The purpose of this Policy is to define how GoSignMeUp will implement this requirement, and who to contact with questions about the NPP.

¹ 45 C.F.R. 164.520 *Notice of Privacy Practices*

² 45 C.F.R. 164.520(b) *Content of Notice*

Definitions

- **Covered Entity** is a healthcare clearinghouse, health plan, or a healthcare provider that transmit health information electronically.
- **Direct Treatment Relationship** refers to a treatment relationship between an individual and a healthcare provider in which the provider delivers healthcare services or products, or reports diagnoses or results from that healthcare, directly to that individual, under the provider's own orders and with no other provider intervening.
- **Health Insurance Portability & Accountability Act (HIPAA)** refers to a federal law that protects the confidentiality and security of healthcare information. HIPAA sets forth standards for both the privacy (Privacy Rule) and security (Security Rule) safeguards for Protected Health Information (PHI).
- **Protected Health Information (PHI)** is any data that identifies the individual or for which there is a reasonable basis to believe can be used to identify the individual. Individually identifiable health information includes many common identifiers (e.g., name, address, birth date, Social Security Number).
- **Workforce** refers to faculty, staff, volunteers, trainees, students, agents, and other persons whose conduct, in the performance of work for GoSignMeUp, is under the direct control of GoSignMeUp, whether or not GoSignMeUp pays them.

Policy

GoSignMeUp will provide to each individual, with whom a Direct Treatment Relationship exists a copy of GoSignMeUp's Notice of Privacy Practices (NPP) at the first date of delivery of service or at any other time if requested by an individual. This NPP will clearly and adequately provide an explanation of the individual's rights with respect to their PHI and the privacy practices of GoSignMeUp pursuant to HIPAA.

GoSignMeUp's NPP will be clearly labeled and prominently displayed in all delivery sites at GoSignMeUp. Additionally, if GoSignMeUp maintains a website, an electronic version will be located on that site.

Procedure

Each individual that receives healthcare services at GoSignMeUp will receive a NPP. GoSignMeUp will make best attempts to obtain an acknowledgement of receipt of the NPP from the individual.

- 1) Workforce members responsible for patient registration are responsible for distributing NPP's to individuals at the time of their visit as follows:
 - a) **New Patients.** At the time of registration, Workforce member will provide the individual with the NPP and obtain a signed acknowledgement of receipt.

- b) **Current Patients.** If there is no documentation of a previous receipt and acknowledgment of the NPP for the individual, Workforce member will provide the individual with the NPP and request the individual to acknowledge receipt of the NPP by signing the Patient Acknowledgment form.
 - c) **Refusal to Acknowledge Receipt of NPP.** If the individual refuses or is unable to acknowledge receipt of the NPP, Workforce member will document the individual's refusal or inability to sign on the acknowledgment form along with any efforts that were made to obtain the individual's signature.
 - d) **Emergency.** In the case of an emergency treatment situation, GoSignMeUp will provide the NPP to the individual as soon as reasonably practicable after the emergency treatment situation.
 - e) File the NPP acknowledgment of receipt in the individual's record.
- 2) **Requests for NPP.** If an individual requests a copy of GoSignMeUp's NPP, Workforce member will provide a copy of the NPP to the individual and direct the individual to the GoSignMeUp's NPP on its website, if any.
 - 3) GoSignMeUp will post a copy of the NPP in a clear and prominent location such as the entrance lobby or similar location.
 - 4) A current version of the NPP will be maintained on GoSignMeUp's website, if any.
 - 5) Whenever the NPP is revised, the Privacy Official will assure that the revised NPP is:
 - a) Made available upon request on or after the effective date of the revision; and
 - b) Posted in a clear and prominent location.
 - 6) A copy of each NPP issued by GoSignMeUp will be maintained for at least six years from the date it was last in effect.
 - 7) Direct to the Privacy Official:
 - a) Any questions about GoSignMeUp's NPP; and
 - b) All information about a violation or potential violation of this Policy in accordance with GoSignMeUp's *Complaint Policy*.

Additional Documents

Table 3 provided below references other documents that GoSignMeUp referred to, or relied on, in the Policy and Procedure statement. The documents may include other privacy and security policies, forms, or guidelines.

Table 3 – Documents Referenced by this Policy and Procedure

Document Name	Location or Custodian
<i>Notice of Privacy Practices</i>	<i>Security Metrics Portal</i>