



Notice of Privacy Practices

Effective: September 15, 2017

THIS NOTICE SUPPLEMENTS THE NOTICE PROVIDED BY Bay Area Surgical Specialists, Inc., DBA BASS Medical Group AND DESCRIBES HOW MEDICAL INFORMATION ABOUT YOU MAY BE USED OR DISCLOSED AND HOW YOU CAN GET ACCESS TO THIS INFORMATION. PLEASE REVIEW IT CAREFULLY.

Welcome to Collective Health. We partner with Bay Area Surgical Specialists, Inc., DBA BASS Medical Group and its affiliates (collectively "BASS Medical Group") to make sure you get the health benefits you deserve.

Information about your health care is personal and private, and we care about helping you keep it that way.

This document is Collective Health's Notice of Privacy Practices. It summarizes your health care privacy rights and details how Collective Health may use or disclose your health care information. Read it carefully, and if you have any questions, get in touch with us by email at privacy@collectivehealth.com, or give us a call at 844-857-6294.

1. "What information about me is protected?"

As part of our work with BASS Medical Group to administer your health benefits, we create, receive, transmit, and maintain information about you. When this information concerns your health care and could identify you as an individual, it is protected. This information is called "protected health information," or "PHI."

The ins and outs of PHI are governed by HIPAA (the Health Insurance Portability & Accountability Act of 1996), HITECH (the Health Information Technology for Economic and Clinical Health Act of

2009), and the regulations that enforce them. Throughout this Notice, we refer to these laws and regulations as “the federal health care privacy rules.” We may also be required to comply with state privacy and security laws, where those state laws are more protective than the federal health care privacy rules. Collective Health is dedicated to protecting the security and privacy of your PHI. We take these responsibilities seriously and implement safeguards to protect your PHI.

2. “What information does Collective Health receive in order to administer my health plan?”

In the course of administering your health plan, Collective Health collects various types of PHI from you, your employer, your plan’s network partners, and other health benefit partners designated by your plan. Examples of data collected include:

- Eligibility and enrollment data from your employer,
- Claims data from your plan’s network partners, and
- Treatment and claims information from your plan’s health benefits partners.

This information may be used, for example, to determine benefits eligibility, evaluate benefits and claims, pay claims on behalf of your health plan, coordinate and manage care, and improve the quality of our services.

3. “What are my privacy rights?”

Together with your BASS Medical Group health plan, Collective Health is required to maintain the privacy of your PHI. Your health plan is required to provide you with a notice (like this one) of its legal duties and privacy practices with respect to your PHI.

Below, we summarize your privacy rights under the federal health care privacy rules. To make a request under any of these rights, contact Collective Health’s privacy office – our contact information is at the end of this Notice.

- You have the right to ask for restrictions on how your PHI may be used or disclosed. We’re not required to agree your request, except in limited circumstances. When it’s reasonable to do so, we’ll pass your request on to your health plan administrator at BASS Medical Group.

- You have the right to receive your PHI confidentially – for example, at an address other than your home, or on a different phone number – if you tell us in writing that disclosing the information as usual could endanger you.
- You have the right to access your PHI (or request an electronic copy), if your PHI is maintained in a designated record set. A designated record set is the information your health plan uses to make decisions about your health coverage. It includes enrollment, payment, claims adjudication, and care management information that we maintain on behalf of your health plan. We will provide electronic copies of this information via e-mail at no charge, but might charge you a reasonable fee for physical copies.
- You have the right to request that we amend your PHI, if your PHI is maintained in a designated record set. We may deny your amendment request if we believe the information we have about you is accurate and complete.
- You have the right to request an accounting of certain disclosures that we've made of your PHI. You can request a list of disclosures for the past six years. We don't have to provide an accounting of routine disclosures (those made for payment, treatment, or health care operations), and we won't list disclosures that you authorized.
- You have the right to request a paper copy of this Notice, and we'll send you one without charge.

We are required to abide by the terms of this Notice. We may update this Notice, as long as our updates are consistent with the federal health care privacy rules. If we make a material change, we'll provide a revised Notice. If there is a breach of your unsecured PHI, your health plan must notify you.

4. "When may Collective Health use or disclose my PHI?"

Collective Health may use or disclose your PHI in the provision of services for your health plan. We are legally permitted to use or disclose your PHI without your written permission in the following ways:

- **Treatment** - We may disclose information to doctors, dentists, pharmacies, hospitals and

other health care providers who take care of you. For example, a doctor may send us information about your diagnosis and treatment plan so that we can adjudicate your claims or arrange for additional services.

- **Payment** - We may need to use your PHI to determine your plan's responsibility to pay for health-related services that you receive. For example, your health plan may be responsible for the payment of treatment you received from a health care provider. When we receive claims from your plan's network providers, we use and disclose your PHI to determine how much, if any, of the claim your plan is responsible for paying.
- **Health Care Operations** - We may use or disclose your PHI throughout the course of our operations in order to answer questions about your health benefits and services, coordinate and manage care, measure performance and outcomes, and improve the quality of our products and services. For example, we may use or disclose your PHI to make you aware of relevant programs and/or disease management services offered by your health plan.

Outside of Treatment, Payment, or Health Care Operations, we can only use or disclose your PHI when you provide written authorization, or permission, to your plan for us to do so. If you give your plan written authorization to use or disclose your PHI, you have the right to revoke that authorization at any time, as long as you let us know in writing – note that we may have already taken action in reliance on your authorization.

We will never use or disclose PHI for marketing purposes where we receive payment in exchange, and we'll never sell your PHI, unless you give us written authorization to do so.

BASS Medical Group may not use PHI that is genetic information for underwriting purposes. Except for limited health care operations purposes, we will never use or disclose any psychotherapy notes about you as a patient unless you've provided a written authorization.

There are certain other circumstances where we can use or disclose your PHI without your authorization or consent (see the list below). In any of these circumstances, we may also disclose your PHI to individuals or entities that work with us and BASS Medical Group to administer your health benefits. These third parties are called "business associates." Before we send them your PHI, business associates agree in writing to abide by the health care privacy rules to maintain the

confidentiality of the information we send them and to notify us in case of a breach.

The federal health care privacy rules allow us to use or disclose PHI, without your authorization, for the following purposes:

- When required by law.
- For public health activities.
- To report child or domestic abuse.
- For governmental oversight activities.
- Pursuant to judicial or administrative proceedings.
- For certain law enforcement purposes.
- For a coroner, medical examiner, or funeral director to obtain information about a deceased individual.
- For organ, eye, or tissue donation purposes.
- For certain government-approved research activities.
- To avert a serious threat to an individual's, or the public's, health or safety.
- For certain governmental functions, such as those related to military services or national security.
- To comply with workers' compensation laws.
- To a family member or close friend that you have identified and who is directly involved in your care or payment for your care.
- To notify a family member or other individual involved in your care of your location, general condition, or death; or to a public or private entity, if the entity is authorized by law or its charter to assist in disaster relief efforts to make such notifications.

We may disclose your PHI to BASS Medical Group in its role as administrator of your health plan, or for plan administration purposes that are permissible under the federal health care privacy rules. We may not disclose your PHI to BASS Medical Group for employment-related functions (for example, to document your need for sick leave) or functions in connection with any other benefits

(for example, to terminate your employer-provided life insurance policy).

5. “What if my privacy rights are not respected?”

If you believe that your privacy rights have been violated, you have the right to file a complaint.

We will not retaliate against you for filing a complaint, and neither will BASS Medical Group.

You may submit a complaint to Collective Health:

CollectiveHealth Administrators, LLC
ATTN: Privacy Officer
P.O. Box 78550
San Francisco, CA 94107
844-857-6294
privacy@collectivehealth.com

You may submit a complaint to your health plan, which is sponsored and administered by BASS Medical Group:

Bay Area Surgical Specialists,
Inc., DBA BASS Medical Group
ATTN: [Name], Privacy Officer
[TELEPHONE]
[EMAIL]

You may also file a complaint with the federal agency responsible for enforcing the health care privacy rules:

U.S. Department of Health and Human Services Office for Civil Rights
200 Independence Avenue, S.W.
Washington, D.C. 20201
1-877-696-6775
www.hhs.gov/ocr/privacy/hipaa/complaints/