

POLICY TITLE: 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.

Vantage uses health information about you for treatment, to obtain payment for treatment, for administrative purposes, and to evaluate the quality of care that you receive. Your health information is contained in a medical record that is the physical property of Vantage.

How Vantage May Use or Disclose Your Health Information

For Treatment: Vantage may use your health information to provide you with medical treatment or services. This information is necessary for health care providers to determine what treatment you should receive. Health care providers will also record actions taken by them in the course of your treatment and note how you respond to the actions.

For Payment: Vantage may use and disclose your health information to others for purposes of receiving payment for treatment and services that you receive. For example, a bill may be sent to you or a third-party payor, such as an insurance company or health plan. The information on the bill may contain information that identifies you, your diagnosis, and treatment or supplies used in the course of treatment.

For Health Care Operations: Vantage may use and disclose health information about you for operational purposes. For example, your health information may be disclosed to members of the medical staff, risk or quality improvement personnel, and others to:

- Evaluate the performance of our staff;
- Assess the quality of care and outcomes in your cases and similar cases
- Learn how to improve our facilities and services; and
- Determine how to continually improve the quality and effectiveness of the health care we provide

Appointments/Treatments/Treatment Alternatives: Vantage may use your information to provide appointment reminders. Vantage may leave you messages on your answering machine about deliveries. Vantage may contact you with information about treatment alternatives or other health-related benefits and services that may be of interest to you. If you do not wish to be contacted about appointments, deliveries or for treatment alternatives, advise us in writing to the attention of the Corporate Compliance Officer and/or Privacy Officer and we will not disclose your information for these purposes.

Persons Involved in Your Care: Vantage may disclose medical information about you to a relative, close personal friend or any other person you identify if that person is involved in your care and the information is relevant to your care. If the patient is a minor, we may disclose medical information about the minor to a parent, guardian or other person responsible for the minor except in limited circumstances.

We may also use or disclose medical information about you to a relative, another person involved in your care or possibly a disaster relief organization (such as the Red Cross) if we need to notify someone about your location or condition.

You may ask us at any time not to disclose medical information about you to persons involved in your care. We will agree to your request and not disclose the information except in certain limited circumstances (such as emergencies) or if the patient is a minor. If the patient is a minor, we may or may not be able to agree to your request.

Fund Raising: If Vantage conducts fundraising and we use communications like the U.S. Postal Service or electronic email for fundraising, the patient has the right to opt-out of receiving such communications. Patients must contact our Corporate Compliance Office and/or Privacy Officer to opt-out of fundraising communications if they choose to do so.

Required by Law: Vantage may use and disclose information about you as required by law. For example, Vantage may disclose information for the following purposes:

- For judicial and administrative proceedings pursuant to legal authority
- To report information related to victims of abuse, neglect or domestic violence; and
- To assist law enforcement officials in their law enforcement duties

Public Health: Your health information may be used or disclosed for public health activities such as assisting public health authorities or other legal authorities to prevent or control disease, injury, or disability, or for other health oversight activities.

Health oversight Activities: Vantage may disclose medical information about you to a health oversight agency-which is basically an agency responsible for overseeing the healthcare system or certain government programs.

Decedents: Health Information may be disclosed to funeral directors or coroners to enable them to carry out their lawful duties.

Organ/Tissue Donation: Your health information may be used or disclosed for cadaveric organ, eye or tissue donation purposes.

Research: Vantage may use your health information for research purposes when an institutional review board or privacy board that has reviewed the research proposal and established protocols to ensure the privacy of your health information has approved the research.

Health and Safety: Your health information may be disclosed to avert a serious threat to the health or safety of you or any other person pursuant to applicable law.

Business Associates: Vantage will disclose your health information to our business associates who we have contracted to provide services for Vantage. We require business associates to protect your health information and notify Vantage immediately if a breach is detected.

Lawsuits and Dispute: We may disclose health information about you in response to a court or administrative order.

Long Term Care, Personal Care and Miscellaneous Institutional Facilities: If you are a resident of a facility, we may disclose to the institution or agents there of health information necessary for your health and safety.

Government Functions: Specialized government functions such as protection of public officials or reporting to various branches of the armed services that may require use or disclosure of your health information.

Workers Compensation: Your health information may be used or disclosed in order to comply with laws and regulations related to Workers Compensation.

Authorizations

Other than the uses and disclosures described above, Vantage will not use or disclose medical information about you without the “authorization” – or signed permission – of you or your personal representative. In some instances, Vantage may wish to use or disclose medical information about you and we may contact you to ask you to sign an authorization form. In other instances, you may contact us to ask us to disclose medical information and we will ask you to sign an authorization form.

You may later revoke your authorization in writing (except in very limited circumstances related to obtaining insurance coverage).

The following uses and disclosures of medical information about you will only be made with your authorization (signed permission):

- Uses and disclosure for marketing purpose
- Uses and disclosure that constitute the sale of medical information about you
- Most uses and disclosures of psychotherapy notes, if we maintain psychotherapy notes
- Any other uses and disclosures not described in this notice

Your Health Information Rights

You have the right to:

- Request a restriction on certain uses and disclosures of your health information for treatment, payment and healthcare operations as provided by 45 CFR §164.522. Vantage must agree to your request and comply with requested restriction(s) if:
 - Except as otherwise required by law, the disclosure is to a health plan for purpose of carrying out payment of healthcare operations

- The medical information pertains solely to a healthcare item or service for which the healthcare provided has been paid out-of-pocket in full
- Obtain a paper copy of the notice of information practices upon request or contact our Corporate Compliance Officer and/or Privacy Officer 814-337-0000
- Inspect and obtain a copy of your health record as provided for in 45 CFR §164.524 for the previous six (6) years – if we maintain your health records in an electronic health record (HER) system, you may obtain an electronic copy of your medical records. You may also instruct us in writing to send an electronic copy of your health record to a third party. Vantage may deny your request in certain circumstances, which we will inform with a written explanation. Vantage may charge you a fee to cover the costs of the copy or labor if electronic
- Amend your health record as provided in 45 CFR §164.526
- Request communications of your health information by alternative means or at alternative locations
- Revoke your authorization to use or disclose health information except to the extent that action has already been taken
- Receive an accounting of disclosures made of your health information as provided by 45 CFR §164.528
- Notification of an event of a breach of your health information. If a breach of our health information occurs, and if that information is unsecured, we will notify you promptly with the following information:
 - A brief description of what happened
 - A description of the health information that was involved
 - Recommended steps you can take to protect yourself from harm
 - What steps we are taking in response to the breach
 - Contact procedure so you can obtain further information
- Opt-out of receiving any fundraising communications from Vantage
- Prohibition on the sale of PHI without the express written authorization of the individual

Complaints

We welcome all comments and concerns, regarding your safety issues, privacy rights, or the care you or a loved one received from us. Should you wish to speak to someone about your service please call us at 814-337-0000. Other options for you to call are The Joint Commission at 800-994-6610 or the Medicare Beneficiary Support Line at 800-633-4227.

If you have any questions or complaints, please contact:

Ray Morin, Corporate Compliance Officer, 1305 S. Main Street, Meadville, PA 16335
814-337-0000 Ext. 2136

To file a written complaint with the Federal government, please use the following contact information:
Office of Civil Rights, U.S. Department of Health and Human Services
200 Independence Ave, S.W. Room 509F, HHH Building, Washington, D.C. 20201

Obligations of Vantage

Vantage is required to:

- Maintain the privacy of protected health information
- Provide you with this notice of its legal duties and privacy practices with respect to your health information
- Abide by the terms of this notice
- Notify you if we are unable to agree to a requested restriction on how your information is used or disclosed
- Accommodate reasonable requests you may make to communicate health information by alternative means or at alternative locations
- Obtain your written authorization to use or disclose your health information for reasons other than those listed above and permitted under law

Vantage reserves the right to change its information practices and to make the new provisions effective for all protected health information it maintains. Revised notices will be made available to you on the Vantage Website. You are entitled to a copy of the notice currently in effect. Vantage will abide by the terms of the current notice.

This Notice applies to the following Vantage® companies: Vantage® Home Medical Equipment and Services, Vantage® Mobile Services, Vantage® Care Apothecary

Notice of Privacy Practices

Effective: April 14, 2003, Revised: 1/1/2004; 10/5/05; 3/16/2009; 9/1/2009; 09/23/13; 06/09/14; 10/24/16; 12/2022; 05/22/2023