

# NOTICES OF PRIVACY PRACTICES, NON-DISCRIMINATION & AVAILABILITY OF LANGUAGE ASSISTANCE & AUXILIARY AIDS

## For all On With Life Programs

**The Health Insurance Portability and Accountability Act of 1996 (HIPAA) and its later amendments require that On With Life provide you with a Notice of Privacy Practices. Please review this Notice carefully.**

### For More Information Or To File A Complaint

This Notice has been provided to you as a summary of how On With Life may use and disclose your protected health information (PHI) and your rights with respect to your PHI. Please contact the Privacy Officer at the phone number listed below with questions, requests for more information or to file a complaint if you believe your privacy rights have been violated.

You may also file a complaint with the Secretary of Health and Human Services. If you file a complaint, there will be no retaliation and you will continue to receive care and treatment.

On With Life reserves the right to revise practices with respect to protected health information and to amend this Notice. Should you wish to obtain a revised Privacy Notice, please contact On With Life's Privacy Officer.

**Privacy Officer  
On With Life, Inc.  
715 SW Ankeny Rd.  
Ankeny, IA 50023  
Telephone: 515-289-9600  
[complianceitems@onwithlife.org](mailto:complianceitems@onwithlife.org)**

### Introduction

To coordinate your care, treatment and services, information regarding your medical history, treatment and payment for your health care may be originated and/or received by On With Life. Information which can be used to identify you and which relates to your medical care or payment for your medical care is commonly known as "protected health information," or PHI, and its use and disclosure is protected by state and federal law. On With Life always obtains or discloses only the minimum amount of relevant information necessary, and has administrative (policies, procedures), physical (security locks, backups) and technical safeguards (passwords, encryption) in place to ensure the confidentiality, availability, and integrity of this information. Except for the types of situations listed below, On With Life must obtain your specific written authorization for any release of your PHI.

### Ways Your Protected Health Information (PHI) Can Generally Be Disclosed

Generally speaking, health professionals, using their best judgment, may release to a family member, other relative, close personal friend or any person you identify, *health information relevant to that person's involvement in your care or payment related to your care.*

We may request specific written authorization from you to release records related to mental health information, substance abuse, human immunodeficiency virus (HIV) test results, suspected assault and abuse, legal requests, and the records of minors. Any requests related to marketing, such as highlighting the story of a person served for our Headway magazine, will also require a specific written authorization.

### How On With Life Will Use Your Health Information For Treatment Purposes

On With Life provides multi-disciplinary, team-based care to our persons served, so staff working in all areas of your care need access to your PHI. Those individuals may include, but are not limited to: physicians, nurses, social workers, rehabilitation and therapy staff, psychologists, and dietitians. All On With Life staff are oriented at hire and re-educated annually on safeguarding the protected health information of our persons served. Non-staff, such as students in training, are also educated on these policies and are required to sign confidentiality statements before they are allowed access to your PHI. It may also be necessary to release your PHI to health care providers outside On With Life who are involved in your care, such as a hospital or clinic, directly or through a health information exchange system, to ensure continuation of your medical care. Please note that if you do not consent to us or your other healthcare providers accessing your relevant medical information, it may affect our ability to serve you.

### How On With Life Will Use Your Health Information For Payment Purposes

It is necessary for On With Life to use or release PHI to you, your insurance company, or other third party payer, so that treatment and services provided by On With Life may be billed and collected for. Documentation related to payment may include PHI which identifies you, your diagnosis, and any care you may receive. On With Life may also release your PHI to another health care provider, individual or entity covered by the HIPAA privacy regulations for payment activities, including, but not limited to, Medicaid, Medicare or your personal health insurance carrier.

### How On With Life Will Use Your Health Information For Health Care Operations

Your PHI may also be used for internal quality assurance purposes, such as measuring our performance on certain quality of care measures. We take steps to de-identify this information so that it cannot be tied to you as an individual person served. We may disclose PHI to our business associates that perform functions on our behalf or provide us with services (such as a third party administrator that assists with claims processing, or language interpreting services) if the information is necessary for such functions or services. All of our business associates are obligated to protect the privacy of your information and are not allowed to use or disclose any information other than as specified in our business associate agreements. On With Life will never sell your protected health information.

### Using PHI for Research Purposes

Your de-identified PHI may be used or released for research purposes if the research follows all required approval procedures and the necessary rules governing uses and disclosures of protected health information are agreed to and followed. An example of research is comparing outcomes for the same treatment amongst different persons served. We may ask you for specific authorization for any research in which your protected health information would not be de-identified, though in some cases, as allowed by HIPAA regulations, your PHI may be used or disclosed for research purposes without your authorization if an Institutional Review Board or Privacy Board has reviewed the research proposal and determined that it meets the privacy and ethical standards required by law.

### Using PHI As Required Or Permitted By Law

Federal law requires additional disclosures of PHI that are not related to the above. These include:

- *Abuse Reporting:* On With Life may have to respond to a court order or report documented or suspected abuse, neglect, domestic violence or certain physical injuries, to legal authorities such as law enforcement officials, court officials, or government agencies.
- *Public Health Activities:* On With Life may be required to release your PHI to authorities to help prevent or control disease, injury, or disability, including but not limited to, the reporting of disease, injury, vital events such as birth or death and the conduct of public health surveillance, investigations and interventions.
- *Health Oversight Activities:* On With Life may be required to release your PHI to agencies that monitor, investigate, inspect, discipline or license those who work in the health care system.
- *To Avoid A Serious Threat To Health Or Safety:* As required by law and standards of ethical conduct, we may release your PHI to the proper authorities if it is believed, in good faith, that it is necessary to prevent or minimize a serious and approaching threat to you or others' health or safety.
- *Law Enforcement:* On With Life may release your PHI for law enforcement purposes as required by law or in response to a court order, subpoena, warrant or other lawful process.
- *Judicial and Administrative Proceedings:* If you are involved in a lawsuit or other administrative proceeding, we may release your Protected Information in response to a court order requesting the release.
- *Medical Examiners/Coroners:* We may release PHI for purposes of identification or determining cause of death.
- *Workers Compensation:* We may release PHI to comply with laws relating to workers compensation or other similar programs established by law.
- *Social Security Administration:* On With Life may release PHI for eligibility and benefit determinations related to Social Security.

*Specialized Government Functions:* Your PHI may be used or disclosed for a variety of other government functions, subject to some limitations. These functions include:

- Military and veterans activities;
  - National security and intelligence activities;
  - Protected service of the President and others;
  - Correctional institutions and custodial situations;
  - Provision of public benefits.
- If you are an organ donor, On With Life may release your PHI to organizations involved with obtaining, storing or transplanting organs for donation purposes.

### Your Rights

Federal law grants you certain rights with respect to your PHI. Specifically, you have the right to:

- Receive notice of On With Life's policies and procedures used to protect your PHI (this document).
- Ask, in writing, that certain uses and disclosures of your PHI be restricted, such as limiting the amount of information disclosed to a certain family member.
- Ask, in writing, to inspect and copy your PHI.
- Ask, in writing, that your PHI be amended.
- Obtain an accounting of certain disclosures of your PHI by On With Life after the effective date of this Notice. Please submit this request in writing.
- Request cancellation, in writing, of any prior authorizations or consents for use or disclosure of PHI, except to the extent that action has already been taken.
- Request, in writing, communication of your PHI by alternative means or at alternative locations (such as a specific phone number or mailing address).
- As a non-profit, On With Life occasionally sends fundraising communications to former persons served and families. You have the right to opt-out of fundraising communications from On With Life. To do so, please notify a member of your care team or contact the Privacy Officer at the phone number listed on this Notice.

## Our Responsibilities

Federal law also imposes certain obligations and duties upon On With Life with respect to your PHI. Specifically, On With Life is required to:

- Provide you with a notice of On With Life's legal duties and its policies regarding the use and disclosure of your protected health information (this document).
- Maintain the privacy of your PHI in accordance with state and federal law. This includes protecting PHI for 50 years after an individual is deceased.
- Notify you if your unsecured PHI is breached.
- Respond to your request to restrict certain uses and disclosures of your PHI. We must agree to your request to restrict PHI if the information pertains to a health care item or service for which you, or person other than a health plan on your behalf, have paid in full.
- Allow you to inspect and obtain a copy of your PHI during regular business hours and according to On With Life policy. If your PHI is maintained electronically in one or more designated records sets, we must provide you access to your PHI in the electronic form and format you request that is readily producible.
- Act on your request to amend PHI within sixty (60) days and notify you of any delay that would require On With Life to extend the deadline by thirty (30) days.
- Accommodate reasonable requests to communicate PHI by alternative means or methods.
- Make a good faith effort to obtain a signed acknowledgement that you have received this Notice.
- Abide by the terms of this Notice.

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**Incidental Disclosures:** The Federal HIPAA laws acknowledge that incidental disclosures may occur. Examples of incidental disclosures include:

- a discussion with your provider may be overheard by another person
- a visitor may glimpse your name somewhere in our facilities
- an employee not regularly involved with your care (such as information technology staff) may see some of your care documentation while doing maintenance on On With Life's electronic medical record

Unfortunately, no amount of administrative, physical, and technical safeguards can completely eliminate these incidental disclosures, but On With Life will always take reasonable steps to limit them as much as possible.

## Notices of Nondiscrimination, Availability of Language Assistance & Auxiliary Aids, and Grievance/Complaint procedures

On With Life complies with applicable Federal civil rights laws and does not discriminate on the basis of any actual or perceived class, status or characteristic, such as race, ethnicity, creed, color, religion, national origin, ancestry, citizenship status, age, disability status, sex, veteran status, sexual orientation, gender identity, genetics, pregnancy, or any other class, status, or characteristic protected by law. A person served needing any of the following services should contact any On With Life staff member:

- Free aids and services to communicate effectively with us, such as:
  - Qualified sign language interpreters
  - Information in other formats, such as large print, braille, audio, and accessible electronic formats
- Free language services, such as:
  - Qualified interpreters
  - Information written in languages other than English

On With Life's HR Director/Compliance Officer is also its Grievance Coordinator. If you believe that On With Life has failed to provide the services above, has illegally discriminated, or has engaged in unethical, fraudulent, or otherwise illegal conduct, you can submit a concern or grievance to any supervisor, Facility Administrator, or by reaching out to the HR Director/Compliance officer in writing or by asking for them in person at 715 SW Ankeny Road, Ankeny, Iowa 50023. You may also submit by phone (515-289-9600), by fax (515-965-1186), or by emailing [complianceitems@onwithlife.org](mailto:complianceitems@onwithlife.org). You may also submit anonymously by leaving a message at 515-289-9600, ext. 444. Please make sure you provide enough information for the Grievance Coordinator to adequately investigate. If you need help submitting, any On With Life staff member is available to help you. All complaints and concerns are taken seriously and confidentiality maintained to the extent possible.

You may also file a civil rights complaint with the U.S. Department of Health and Human Services, Office for Civil Rights, electronically through the Office for Civil Rights Complaint Portal, available at: <https://ocrportal.hhs.gov/ocr/portal/lobby.jsf>, or <http://www.hhs.gov/ocr/office/file/index.html>, or phone at 1-800-368-1019, 800-537-7697 (TDD), or mail at: U.S. Department of Health and Human Services, 200 Independence Avenue SW, Room 509F, HHH Building, Washington, D.C. 20201

1. Spanish (Español)  
ATENCIÓN: si habla español, tiene a su disposición servicios gratuitos de asistencia lingüística.
2. Chinese (中文 – Simplified)  
注意：如果您使用中文，您可以免费获得语言帮助服务。
3. Vietnamese (Tiếng Việt)  
CHÚ Ý: Nếu bạn nói Tiếng Việt, có các dịch vụ hỗ trợ ngôn ngữ miễn phí dành cho bạn.
4. Serbo-Croatian (Srpsko-hrvatski)  
OBAVJEŠTENJE: Ako govorite srpsko-hrvatski, usluge jezičke pomoći dostupne su vam besplatno.
5. German (Deutsch)  
ACHTUNG: Wenn Sie Deutsch sprechen, stehen Ihnen kostenlos sprachliche Hilfsdienstleistungen zur Verfügung.
6. Arabic (العربية)  
ملحوظة: إذا كنت تتحدث العربية، فإن خدمات المساعدة اللغوية تتوافر لك بالمجان.
7. Lao (ພາສາລາວ)  
ໂປດຊາບ: ຖ້າວ່າທ່ານເວົ້າພາສາລາວ, ການບໍລິການຊ່ວຍເຫຼືອດ້ານພາສາ ໂດຍບໍ່ເສຍຄ່າ, ມີໃຫ້ທ່ານ.
8. Korean (한국어)  
주의: 한국어를 사용하시는 경우, 언어 지원 서비스를 무료로 이용하실 수 있습니다.
9. Hindi (हिंदी)  
ध्यान दें: यदि आप हिंदी बोलते हैं तो आपके लिए मुफ्त में भाषा सहायता सेवाएं उपलब्ध हैं।
10. French (Français)  
ATTENTION : Si vous parlez français, des services d'aide linguistique vous sont proposés gratuitement.
11. Pennsylvania Dutch (Deutsch / Pennsylvania German)  
Wann du Deutsch schwetzst, kannscht du mitaus Koschte ebber gricke, ass dihr helft mit die englisch Schprooch.
12. Thai (ภาษาไทย)  
เรียน: ถ้าคุณพูดภาษาไทย คุณสามารถใช้บริการช่วยเหลือทางภาษาได้ฟรี
13. Tagalog (Tagalog / Filipino)  
PAUNAWA: Kung nagsasalita ka ng Tagalog, maaari kang gumamit ng mga serbisyo ng tulong sa wika nang walang bayad.
14. Karen (ကညီကျိာ် / Karenic)  
သတိပေးချက် - နင်က ကညီကျိာ်စကား ပြောတတ်လျှင်၊ ဘာသာစကား အကူအညီ ဝန်ဆောင်မှုများကို အခမဲ့ရရှိနိုင်ပါသည်။
15. Russian (Русский)  
ВНИМАНИЕ: Если вы говорите на русском языке, то вам доступны бесплатные услуги перевода.