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.

Introduction
All of us at Mitchell Cancer Institute Pharmacy value your relationship with us, and we know that respect for your privacy is the foundation of that relationship. We are committed to protecting the privacy of your protected health information ("PHI") that is in our possession, and only using and disclosing your PHI as permitted by applicable laws and regulations. PHI is any information that we possess, use, and disclose that identifies you and relates to your past, current, or future physical and mental health condition or illness and the health care products and services that have been provided to you. This Notice of Privacy Practices ("Notice") has been created to help you understand our legal duties under the Health Insurance Portability and Accountability Act of 1996 ("HIPAA") to protect your PHI and how we may use and disclose your PHI. We will mainly use and disclose your PHI in relation to the health care products and services that we provide you, such as dispensing your prescriptions. Specifically, we will use and disclose your PHI as necessary to provide treatment to you, to obtain payment for health care products and services provided to you, and other health care operations and activities as described later in this Notice. This Notice also describes the legal rights that you have related to your PHI that is in our possession. We take the matters described in this Notice very seriously because of our relationship with you and the requirement that we comply with this Notice. Your PHI will only be used and disclosed as described in this Notice. Should a need for use and disclosure of your PHI occur that is not described in this Notice, we will obtain your written authorization before the use and disclosure. At some future time, it may be necessary for us to revise this Notice. If such becomes necessary, we will post the revised Notice in the pharmacy, on Mitchell Cancer Institute Pharmacy’s website and, if you request, provide a written Notice to you.

Your Rights with Respect to Your PHI
HIPAA provides you with several rights related to your PHI. These rights are summarized below. If you would like more information about any of these, please contact our Privacy Officer at the addresses or telephone numbers indicated at the end of this Notice.

1. You have the right to receive this written Notice of Privacy Practices describing how we will protect your PHI and your rights related to PHI.
   You are entitled to request this written Notice at any time.
2. You have the right to request a limitation on our use and disclosure of your PHI. But please be aware that we may not be able to agree to your requested limitation if it results in our not being able to provide health care products and services to you or if we are required to use and disclose the PHI under federal or state law. Mitchell Cancer Institute Pharmacy intends to honor requests by you not to disclose PHI to your health plan if the PHI relates solely to an item or service for which you have already paid in full. All requests for limitation on the use and disclosure of your PHI must be submitted in writing, using a form that we will provide, to our Privacy Officer. The addresses and telephone numbers for our Privacy Officer are listed at the end of this Notice.
3. You have the right to review or receive photocopies of our records that contain your PHI, to the extent that these records are part of a “designated record set” as defined by HIPAA. The most common such records are your prescriptions on file with us and our patient profile for you. If we are unable to provide our records to you, we will provide you a written explanation of why we are not able to provide the records. Depending on the reason, you may submit a written request for us to reconsider. All requests to review or receive photocopies of our records that contain your PHI must be submitted in writing, using a form that we will provide, to our Privacy Officer. The addresses and telephone numbers for our Privacy Officer are listed at the end of this Notice.
4. You have the right to request changes to your PHI in our records if you believe that the PHI is inaccurate, incomplete, inaccurate, or for some other reason needs to be changed. We may not be able to agree to your requested change if we no longer have the records or if the requested change would cause your PHI to become inaccurate. If we are not able to agree to your requested change, we will notify you in writing as to why we are not able to agree. You will then have the right to submit to us a written statement of disagreement, to which we may elect to further respond in writing to you. All requests for changes to your PHI in our records must be submitted in writing, using a form that we will provide, to our Privacy Officer. The addresses and telephone numbers for our Privacy Officer are listed at the end of this Notice.
5. You have the right to request that we communicate with you about your PHI in a confidential manner and only to locations (such as a post office box) or by particular means (such as personal cellular telephone) specified by you. All requests for confidential communications must be submitted in writing, using a form that we will provide, to the Pharmacy Manager of the pharmacy location which serves you. The addresses and telephone numbers for our pharmacy locations are listed on the first page of this Notice.
6. You have the right to obtain an accounting of some of our disclosures of your PHI. By an accounting, we mean a written record of these disclosures. Some of our disclosures of your PHI are not required by HIPAA to be included in the accounting unless they are maintained in an electronic health record. Most notable among these are disclosures for purposes of treatment, obtaining payment, and carrying out health care operations. Other disclosures of your PHI that are not required to be included in the accounting are disclosures made directly to you or that you have authorized, made to family, friends, and others who assist you or are involved with your care (caregivers) and made for other purposes allowed by HIPAA. Please consult with our Privacy Officer, at the addresses or telephone numbers indicated at the end of this Notice, for more information on the disclosures not required to be including in the accounting. The period of time for which we are required to provide the accounting is the six-year period immediately prior to the date of your request for the accounting, except for disclosures for treatment, payment, and health care operations of an electronic health record, for which the period is three years. However, your request for an accounting can be for a shorter period of time. For disclosures by our business associates, we may provide you with a list of those business associates, in which case you may request an accounting of disclosures from them. You may obtain from us, without charge, one accounting during a 12-month period. However, if you request additional accountings during the same 12-month period, we may charge you $0.10 per page for printing or photocopying of the accounting, together with any expenses for mailing, special courier, faxing, and supplies necessary to fulfilling your request for the accounting. If it becomes necessary for us to charge you for an accounting, we will notify you in advance and allow you to withdraw or modify your request for the accounting. All requests for an accounting of our disclosures of your PHI must be submitted in writing, using a form that we will provide, to our Privacy Officer. The addresses and telephone numbers for our Privacy Officer are listed at the end of this Notice.
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PHARMACY

7. We are obligated to notify you if a breach occurs that may have compromised the privacy or security of your PHI.
8. You have the right to file a complaint if you believe that we have violated your rights as described above, and to not fear retaliation or adverse and adverse actions against you for exercising your right. You can file the complaint with us directly, or with the United States Department of Health and Human Services ("HHS"). Please be assured that we will work with you to resolve any complaint that you contact us to discuss.

If you have questions about any of your rights as described above, please contact the addresses or telephone numbers indicated at the end of this Notice.

You also may visit the following website for information on filing a complaint with the United States Department of Health and Human Services:


Ways That We May Use and Disclose Your PHI

HIPAA requires that this Notice tell you how we may use and disclose your PHI including, in some instances, uses and disclosures that are permitted without your authorization. These uses and disclosures are summarized below, but if you would like more information about any of these please contact our Privacy Officer at the addresses or telephone numbers indicated at the end of this Notice.

1. Treatment. Generally, HIPAA defines treatment as the provision, coordination, or management of health care and related services by one or more health care providers, including the coordination or management of health care by a health care provider with a third party; consultation between health care providers relating to a patient; or the referral of a patient for health care from one health care provider to another. We will maintain records that contain your PHI, and we will use and disclose your PHI as necessary to provide health care products and services to carry out and support your treatment. As a pharmacy, we may use and disclose your PHI as necessary to maintain a patient profile on you, which may include: information about you; your medical condition, medications, and prescription devices that you use; any allergies that you may have; and other information, such as any health insurance that you may have. We may use and disclose your PHI in dispensing prescription medicines and related products and services, including counseling you and your caregivers about proper use of your medications. We may discuss such problems with your other health care professionals, such as your physician or dentist, for purposes of your care and treatment, and through such discussions we may use and disclose your PHI. Finally, we may use and disclose your PHI to you and your caregivers in our discussions with you and your caregivers about your treatment.

2. Payment. Generally, HIPAA defines payment, in relation to health care providers such as us, as activities to obtain reimbursement for the health care products and services that we provide to you. These activities include primarily billing you directly or someone who pays for your health care, such as a family member or health insurance company, for health care products and services that we provide to you. Activities related to billing may include claims management, collections, and related health care data processing. Depending on who pays for the health care products and services that we provide you, other activities may include determination of eligibility or coverage; medical necessity; review of health care services with respect to medical necessity, coverage under a health plan, appropriateness of care, or justification of charges; utilization review activities, including precertification and preauthorization of services; concurrent and retrospective review of services; and disclosure to consumer reporting agencies of some or all of the following PHI necessary for collection of payment: name and address; date of birth; social security number; payment history; account number or numbers; and name and address of the health care provider and/or health plan. We will use and disclose your PHI to carry out the above activities as necessary or required to obtain payment for the health care products and services that we provide to you. In relation to this, public and private health care insurance programs that may provide or pay for your health care can conduct audits, inspections, and investigations of us in relation to our activities and your activities. We may be required to disclose your PHI to these programs for purposes of audits, inspections, and investigations.

3. Health care operations. Generally, HIPAA defines health care operations as those activities necessary and related to our providing of health care products and services to you. These activities include, but may not be limited to, the following:
   a. Conducting quality assessment and improvement activities, case management and care coordination, and contacting of health care providers and patients with information about treatment alternatives and related functions that do not include treatment.
   b. Conducting or arranging for medical review, legal services, and auditing functions, including fraud and abuse detection and compliance programs.
   c. Our pharmacy management and general administrative activities, including, but not limited to, activities relating to implementation of and compliance with the requirements of HIPAA. We will use and disclose your PHI to carry out the above activities as necessary or required, and especially to monitor and improve the quality of the health care products and services that are provided to you and others and health care professionals. In addition to treatment, payment, and health care operations as described above, we may use and disclose your PHI for the following purposes listed below.

4. Business associates. The nature of the health care system is such that we may not be able to provide health care products and services to you without the involvement of other businesses or persons. Depending on what these other businesses or persons do for us, they may become business associates as defined by HIPAA. In many situations, it will be necessary for us to provide your PHI to these business associates so that they can carry out the activities that we need to have performed in order to provide you with health care products and services. Contracts have or will be submitted to the business associates to whom we provide your PHI so that they can carry out their activities on our behalf. Very importantly to you, these contracts require our business associates to give us their assurance that they, like us, will protect the privacy of your PHI. Examples of business associates services include quality improvement, legal, data analysis/aggregation, and accounting.

5. Disclosures of your PHI not involving treatment, payment, and health care operations. In providing health care products and services to you, we may find it necessary to communicate with businesses and individuals not already described above. Most of these disclosures will be related to providing treatment to you, and to carrying out payment and health care operations as discussed above. In addition to communicating with these businesses and individuals, we may also communicate with you directly, as well as others who assist you with your health care, commonly referred to as caregivers. We will disclose your PHI to these caregivers, or appropriate others, as we believe necessary and appropriate for your health care.

6. Communications with you concerning your health and treatment. We want to assist you with maintaining your health and obtaining the most benefit from your treatment. We routinely monitor your prescription medications for appropriateness and take other steps to help you use your medication properly. For example, if our records show that a refill of your medication is due, we may contact you to remind you to obtain the refill. We may also call you or send you materials regarding products and services that we believe may be of benefit to you. As another example, in the event of a medication recall, we may contact you, if you are taking the medication subject to the recall. In addition to face-to-face discussions and telephone conversations with you, we will communicate PHI to you by means of letters that are enclosed.
in sealed envelopes, emailing you at the e-mail address you provide to us, and/or by leaving messages on your answering machine, voice mail or other similar automated system. We will not leave a message with another person which would disclose your particular
16. Other types of disclosures. This last category of disclosures includes a variety of disclosures that we may make in accordance with HIPAA.
14. Disclosures if you are in the military or a veteran. We may use or disclose PHI of individuals who are Armed Forces personnel: (1) for
12. Disclosures for the benefit of you and others. A variety of events could occur where we would use and disclose your PHI for your benefit and
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9. Matters of public health and safety; reporting required by law. There are a number of federal and state laws that require health care
8. Federal and state government health care insurance programs. If you apply for and receive benefits from federal and state health care
7. Federal and state government agencies. We may disclose your PHI to federal and state government agencies for a variety of purposes,
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IF YOU HAVE QUESTIONS ABOUT WAYS THAT WE MAY USE AND DISCLOSE YOUR PHI AS DESCRIBED ABOVE, PLEASE CONTACT OUR PRIVACY OFFICER AT THE ADDRESSES OR TELEPHONE NUMBERS INDICATED AT THE END OF THIS NOTICE.

Uses and Disclosures Not Contained in this Notice. If a use and disclosure of your PHI is not contained in this Notice, then we will obtain your or your authorized representative’s written authorization before the use and disclosure. You may have the right to refuse to authorize the use and disclosure, or if you grant the authorization, to revoke the authorization at any time, except to the extent Mitchell Cancer Institute Pharmacy has taken an action in reliance on the authorization. If such authorization is requested, we will provide you with a form that describes the proposed use and disclosure and your rights related to the requested authorization.

Conclusion

HIPAA requires that we give you this Notice of Privacy Practices and make a good faith effort to obtain your written acknowledgment that you were given this Notice. Upon giving you this Notice, you will be asked to sign a document acknowledging that you received this Notice. We appreciate your cooperation in reviewing this Notice and in giving us your written acknowledgment.

HIPAA requires that this Notice, at a minimum, cover the following three areas:

1. How we will use and disclose your protected health information;
2. Your rights with respect to your protected health information; and
3. Our legal duties to protect the confidentiality of your protected health information and to notify you if a breach occurs that may have compromised the privacy or security of your protected health information.

In preparing this Notice, we made every effort to comply with this HIPAA requirement. Also, we want to advise you that in addition to the privacy and other rights given to you by HIPAA, our state may from time to time enact laws that also provide you privacy and other rights in relation to your health care and your protected health information.

If you have any questions or want more information concerning your privacy rights under HIPAA or under the laws of our state or concerning our privacy practices, please consult our Privacy Officer: by phone at 251-410-6337 or by email at mci.rx@health.southalabama.edu or by mail at 1660 Springhill Ave Ste 3069, Mobile, AL 36604. Also, you should contact our Privacy Officer if you wish to file a complaint about our privacy practices or if you believe we have violated any of your rights as described in this Notice.

Thank you for allowing us the privilege of being your pharmacy. We look forward to continuing to be of service to you.

Effective Date: April 15, 2003; Last Revised Nov 2017