

NOTICE OF PRIVACY PRACTICES

Effective April 14, 2003

This notice describes how protected medical information about you may be used and disclosed and how you can access this information. Please review it carefully.

We protect the confidentiality of our employees' and covered family members' protected health information, as required by law, accreditation standards and our internal policies and procedures. Protected health information is any information concerning individually identifiable health information that relates to past, present or future physical or mental health or condition of an individual; the provision of health care to an individual; or the past, present or future payment for the provision of health care to an individual. This Notice of Privacy Practices explains your rights, our legal duties and our privacy practices.

Your Health Information

We collect, use and disclose information provided by and about you for health care services, payments and business operations, or when we are otherwise permitted by law to do so. We regard all protected health information as confidential. We will not disclose your protected health information unless we are allowed or required by law to make disclosure or if you tell us, we can. We only make those disclosures as necessary to administer your insurance and claims and as necessary to effect transactions in the ordinary course of our business. Disclosures are only made to our affiliates, agents, and certain third parties, such as insurance administrators, consultants, and regulatory or governmental authorities.

We work with outside firms; for example, our insurance broker who assists us with obtaining bids for insurance coverage each year. As permitted by law, these firms may use certain identifying and non-medical information. These firms are subject to the same policies regarding privacy of your information as we are. Our policy is to require outside firms to pledge to maintain the confidentiality of the personal information and abide by all applicable privacy laws. These firms are prohibited from using or disclosing personal information given to them for any purpose other than the work they are performing or as required by law.

Even if your employment with the Allendale Association ends, we pledge to maintain privacy policy and practices so that privacy of protected health information will always be protected.

Information That May Be Collected: Personal information is provided in applications, physicals, claims, and other forms. In addition, we may receive information from your health care providers through the course of managing insurance transactions and FML (Family Medical Leave). We also have personal information from transactions with health insurance providers, affiliates, and certain third parties with whom we receive service. For example, a third party would be the group that administers our flexible spending account.

Generally, we receive information by telephone, in writing or through a computer. This generally includes personal information about your policies, premiums and claims of our employees, beneficiaries and other covered insureds. If additional information is required from medical professionals or consumer reporting agencies, it will be requested only with authorization.

For Payment: We may use and disclose information about you in managing your account or benefits. For example, we maintain information about your premium payments. We may also provide information to a doctor's office to confirm your eligibility for benefits.

For Health Care Operations: We may use and disclose medical information about you for our business operations. For example, we may use information about you to provide enrollment into a health insurance plan.

We may contact you to provide information about health-related benefits and services. For example, when you or your dependents reach a certain age, we may notify you about additional products or programs for which you may become eligible, such as individual coverage.

We may, in the case of group health care plans, share limited information with our health care providers, in order to enroll you in health care plans or to permit us to perform plan administrative functions. We are required by law to have safeguards in place to protect against inappropriate use.

As Permitted Or Required By Law: Information about you may be used or disclosed to regulatory agencies, such as during audits, licensure or other proceedings; for administrative or judicial proceedings; to public health authorities; or to law enforcement officials, such as to comply with a court order or subpoena. We may use or disclose health information about you to avert a serious threat to your health or safety or any other person pursuant to applicable law. We may use or disclose health information about you to comply with laws and regulations related to workers compensation.

Authorization: Other uses and disclosures of protected health information will be made only with your written permission, unless otherwise permitted or required by law. For example, assistance in resolving payment of outstanding claims. You may revoke this authorization, at any time, in writing. We will then stop using your information for that purpose. However, if we have already used your information based on your authorization, you cannot take back your agreement for those past situations.

Your Health Information Rights

Under regulations that will be in effect April 14, 2003, you will have additional rights over your health information. Under the new rules, you will have the right to:

- ▶ a paper copy of our Notice of Privacy Practices at any time. To obtain a copy of our current Notice of Privacy Practices, please contact the Privacy Officer indicated below;
- ▶ send a written request to see or get a copy of information that we have about you, or amend your personal information that you believe is incomplete or inaccurate. If we did not create the information, we will refer you to the source, such as your physician or hospital. In certain very limited circumstances, we may deny your request to inspect or amend and copy your health information. If you are denied access to your health information, we will explain our reasons in writing. You have the right to request that another person at Allendale review the decision and we will comply with the outcome of the review. In all instances, the request for amendment and denial/approval, will be made part of your record;
- ▶ receive an accounting of certain disclosures of your health information, except when those disclosures are made for treatment, payment or health care operations, or the law otherwise restricts the accounting. We are not required to give a list of disclosures made before April 14, 2003;

- ▶ request a restriction or limitation on the health information about you that we use or disclose. Your request must be in writing. Please be aware that we are not required to agree to your request for restrictions. If we agree to your request for a restriction, we will comply with the restriction unless the information is needed for emergency treatment;
- ▶ revoke your authorization to use or disclose health information, except to the extent that action has been taken in reliance upon your authorization. Your request must be in writing;
- ▶ request that we communicate with you about medical matters using reasonable alternative means or at an alternative address, if communications to your home address could endanger you.

Allendale’s Obligations

Allendale is required to:

- ▶ provide you with the Notice of our legal duties and privacy practices with respect to your health information;
- ▶ abide by the terms of the Notice of Privacy Practices currently in effect;
- ▶ notify you if we are unable to agree to a requested restriction on how your health information is 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 identified in this Notice and permitted by law;
- ▶ and comply with your state’s laws if they provide you with greater rights over your health information or provide for more restrictions on the use or disclosure of your health information;
- ▶ comply with judicial or 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;
- ▶ conduct training with individuals who have access to your protected health information.

Complaints & Contact Information

If you believe your privacy rights have been violated, you have the right to file a complaint with the Privacy Officer of the Allendale Association, or with the federal government. You will not be penalized for filing a complaint. Allendale’s Privacy Officers are as follows:

Connie Borucki	Employee complaints	Extension 6213
Danielle Borucki	Client complaints	Extension 6215

Please contact Connie or Danielle if you have any questions about our privacy policy.

Copies and Changes

You have the right to receive an additional copy of this notice at any time.

We reserve the right to revise this notice. A revised notice will be effective for information we already have about you as well as any information we may receive in the future. We are required by law to comply with whatever privacy notice is currently in effect. We will communicate any changes to our notice through employee newsletters, direct mail, and/or our website.