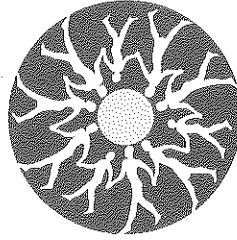


John F. Kennedy Behavioral Health Center

Delores Wilson Esq.
Chairperson
Board of Directors



Jo Williamson
President/CEO

John F. Kennedy Behavioral Health Center **Notice of Privacy Practices for Protected Health Information**

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

I. Purpose of this Notice

As an individual receiving service from John F. Kennedy Behavioral Health Center (JFK), you have a clinical/medical record pertaining to your treatment. JFK protects as confidential any information it collects. This policy describes the types of information JFK collects concerning you, the safeguards that are in place to protect your information, the circumstances under which that information may be shared, and your rights concerning this information.

We understand that information about you and your health is personal and that protecting this information is important. JFK requires all of its employees, staff, volunteers, other personnel, independent contractors and business associates to comply with these privacy practices.

You should read this Notice before signing any documents. If you have any questions or would like to discuss the issue further please contact your case manager, therapist or doctor who will direct your questions to JFK's Privacy Officer.

II. The Use and Disclosure of Information for Treatment, Payment and Health Care Operations

By law JFK is allowed to use and disclose certain medical information for most treatment, payment and healthcare operations once it has provided you with this notice and obtained your written consent for treatment. JFK has described each of these categories below and has provided some examples under each. Not every use of disclosure in a category will be listed.

Treatment means the provision, coordination, or case management of health care and related services by or involving JFK. This includes coordinating care among the various clinical departments within JFK as well as coordinating care with outside health care providers.

For example: Information obtained by a clinician, physician, case manager or other member of your healthcare team will be recorded in your record and used to determine the plan of treatment/service that should work best for you.

Typically, this information includes your symptoms, examination and test results, diagnoses, treatment plan, psychiatric evaluation, and medication regimen. Members of your clinical team will then record the actions they took and their observations. In that way, the team will know how you are responding to care. With your Consent, JFK can exchange information with outside health care providers to help ensure continuity of care.

Also, JFK may contact you by phone or mail and in doing so identify itself, for the purposes of scheduling appointments or addressing other aspects of care.

Payment mainly refers to the activities JFK undertakes to obtain reimbursement for services provided to you. Payment can also include activities related to determining eligibility for services from your insurer, coordination of benefits with other insurers, billing, claims management, collection, medical necessity review activities, utilization review activities, and disclosures to consumer reporting agencies.

For example: A bill may be sent to you or a third-party payer. The information on or accompanying the bill may include information that identifies you, as well as your diagnosis, procedures, and treatment provided. JFK may also be asked to disclose healthcare information to your insurer to determine whether the services provided to you were medically necessary.

Health care operations cover a variety of activities performed by JFK or its business associates that are necessary for quality treatment and services. These include, but are not limited to, conducting quality assessment and improvement activities, including outcomes evaluation and development of clinical guidelines; peer review; credentialing and licensing; training programs; legal and financial services; business planning and development; management activities related to JFK's privacy practices; customer services; internal grievances; creating de-identified information for data aggregation or other purposes; fund-raising; and due diligence activities. Health care operations also include certain marketing activities, but may not include marketing communications direct or indirect payment is made in exchange for the marketing communication. However, a marketing activity is considered to be a health care operation if one of the following three exceptions are met: the communication describes a medication to be prescribed to the recipient and payment to JFK is reasonable in amount; the communication is made by JFK and a valid authorization is obtained; or the communication is made by a business associate pursuant to a valid business associate agreement.

For example: Members of the clinical and/or quality improvement team may use information in your medical record to assess the care and outcomes in your case and others like it. This information will then be used in an effort to continually improve the quality and effectiveness of the healthcare and service we provide.

III. The Use and Disclosure of Information for Other Purposes Not Requiring Authorizations or Consent

Under the circumstances listed below, JFK is permitted by law to use or disclose treatment information without Consent or Authorization:

- (1) To those actively engaged in treating you, or to persons at other facilities, if you are being referred to that facility and a summary or portion of the record is necessary to provide for continuity of proper care and treatment. If applicable, this includes professional treatment staff of State Correctional Institutions and county prisons.
- (2) To the third-party payers, both those operated and financed in whole or in part by any governmental agency and their agents or intermediaries, or those whom you identified to JFK as payor or copayor for your services and who require information to verify that services were actually provided. Information to be released without consent or court order is limited to the staff names, the dates, types and costs of therapies or services, and a short description of the general purpose of each treatment session or service.
- (3) To reviewers and inspectors, including the Joint Commission on Accreditation of healthcare Organizations (JCAHO) and Commonwealth licensure or certification, when necessary to obtain certification as an eligible provider of services.
- (4) To those participating in Professional Standards Review Organization (PSRO) or Utilization Reviews.
- (5) To the Mental Health Administrator, under his or her duties under applicable statutes and regulations.
- (6) To a court or mental health review officer, in the course of legal proceedings authorized by statute or regulations.
- (7) In response to a court order, when production of the documents is properly ordered by law.
- (8) To appropriate regulatory agencies responsible for handling child or patient abuse.
- (9) In response to an emergency medical situation when release of information is necessary to prevent serious risk of bodily harm or death. Only the specific minimum necessary information pertinent to the relief of the emergency may be released on a nonconsensual basis.
- (10) To parents/guardians and others when necessary to obtain consent to medical treatment.
- (11) To attorneys assigned to represent the subject of a commitment hearing.
- (12) To Business Associates with whom JFK contracts for services. Examples include physician laboratory tests, microfilm production, and ambulance transportation. When these services are contracted; JFK may disclose your health information to our business associate so that they can perform the job we have asked them to do and bill you or your third-party payer for services rendered. To protect your health information, however, JFK requires the business associate to appropriately safeguard your information.

- (13) As required by law, JFK may disclose your health information to public health or legal authorities charged with preventing or controlling disease or injury. Examples include adverse reactions to medication and communicable diseases.
- (14) To governmental healthcare oversight entities. Healthcare oversight activities include audits; civil, administrative, or criminal investigations; inspections; licensure or disciplinary actions; and other administrative and judicial actions undertaken by the government (or their contractors) by law to oversee the health care system. JFK may be required to share medical information with a health oversight agency for these activities.

Information made available under these circumstances is limited to a limited data set, which excludes disclosures of name, address, telephone number, social security number, account numbers, and others, if such limited data set is sufficient to carry out the intended purpose. If such limited data set is not sufficient to carry out such purpose, the information will be limited to that information which is minimum and necessary to the purpose for which the information is sought. The information may not, without your consent, be released to additional persons or entities, or used for additional purposes.

IV. Authorizations for Other Uses and Disclosures of Your Medical Information

JFK must obtain your written Consent prior to beginning treatment, payment or health care operations on your behalf. You will be required to read and give your Consent in writing before JFK begins any treatment services.

Unless JFK has your Consent, or is required to use your medical information for the reasons listed above; JFK must obtain your Authorization before making any disclosure. An Authorization is different from Consent in that it is a written document that specifies the exact information which JFK can disclose, the person or entity, to which it may be disclosed, and an expiration date or event for the authorization. You have the right to revoke the authorization except to the extent that JFK has already used or disclosed information in reliance of the authorization, or your authorization was obtained as a condition of obtaining insurance coverage. JFK cannot categorically guarantee that a third party named in your Authorization will abide by JFK's Privacy Notice with respect to your confidential treatment information released to them.

V. Your Health Information Rights

Although your medical record is the physical property of JFK, you have the following rights concerning it:

Restrictions: You have the right to request that JFK restrict uses and disclosures for treatment, payment or healthcare operations including consultations with other healthcare providers. Under federal law, we are required to agree and comply with your request to restrict information if:

- (1) Except as otherwise required by law, the disclosure is to a health plan for the purpose of carrying out payment of health care operations (and is not for the purpose of carrying out treatment); and

- (2) The disclosure relates to products or services that were paid for out-of-pocket in full.

Once we agree to your request, we must follow your restrictions, unless the information is necessary for emergency treatment. You may cancel the restrictions at any time. In addition, JFK may also ask you to revoke a restriction. If you would like to request a restriction, please contact your case manager, therapist or doctor who will assist you in the process.

Confidential Communications: You have a right to request the way in which JFK communicates with you. JFK typically will contact you at the numbers you provide (home and/or work) to confirm or reschedule appointments and will send correspondence with the JFK logo to your home. You have a right to restrict these communications. For example, you may request that JFK only contact you at home and not work. If you would like to request a restriction, you must do so in writing. Please contact your case manager, therapist, or doctor who will assist you in this process.

Access to your Record: You have a right to inspect and copy the information contained in your record. If you request a copy of information in your record JFK will normally comply within 30 days and charge a reasonable copying fee. JFK may request that a clinical professional be present to review the record with you if you request inspection or prior to releasing copies of information to you. If we maintain your medical records in an Electronic Health Format (EHR) system, you may obtain an electronic copy of your medical records. In the following very limited instances, JFK may deny access to all or part of your record.

- (1) Upon reviewing documentation by the treatment team leader, it is determined that disclosure of specific information concerning treatment will constitute a substantial detriment to your treatment.

- (2) When disclosure of specific information will reveal the identity of persons or breach the trust or confidentiality of persons who have provided information upon an agreement to maintain their confidentiality.

- (3) The above limitations are applicable to parents, guardians, and others who may control access over records, except that the possibility of substantial detriment to the parent, guardian, or other person may also be considered.

You may appeal JFK's denial. If you would like to request to inspect or copy your record, please contact your case manager, therapist, or doctor who will assist you in this process of documenting this request in writing.

Amending your Record: You have a right to request that JFK correct or amend information in the record which you believe is inaccurate, irrelevant, outdated or incomplete. Corrections or amendments agreed to by JFK will be documented within 60 days of your written request. JFK has a right to deny this request in writing if it believes the information is accurate and/or complete. You have a right to appeal this denial within 30 days of its receipt. You also have the right to enter written data or memoranda qualifying or rebutting information in your record, which you believe to be erroneous or misleading. Your written data or memoranda will accompany all released records. To exercise any of these rights, please contact your case

manager, therapist or doctor who will assist you in this process of documenting this request in writing.

Accounting: You have a right to request a copy of any authorization you sign to disclose information from your record. JFK will offer you a copy at the point of your request but may take up to 60 days by law to process this request. This accounting does not include disclosures made for treatment, payment or healthcare operations. However, if we maintain your medical records in an Electronic Health Record (EHR) system, you may request that we include disclosures for treatment, payment or healthcare operations for the three year period prior to the date of the accounting request. To exercise this right, contact your case manager, therapist, or doctor who will assist you in the process of documenting this request in writing.

Complaint: You may follow JFK's grievance procedure if you have complaints concerning any disclosure of your personal information. You may also file a complaint to the Secretary of the Federal Department of Health and Human Services if you believe JFK, its employees or its agents have violated any of your rights. For violations of Drug /Alcohol confidentiality, you may contact the United States Attorney for the Philadelphia District. Reports of violations by a Methadone program may be directed to the Food and Drug Administration in Philadelphia. However, under no circumstances will JFK take any retaliation against you for filing a complaint. If you would like to make a complaint, please contact your case manager, therapist or doctor who will assist you in this process. You also may contact the Privacy Officer at the JFK Compliance Helpline: (215) 568-0134 Ext. 3357

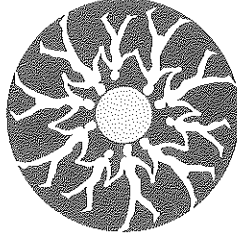
VI. JFK Duties and Responsibilities

JFK is required by law to maintain the privacy and confidentiality of your medical record and information. JFK is also required to provide you with a Notice as to its legal duties and privacy practices with respect to information it collects and maintains about you. JFK must date and comply with the notice currently in effect. JFK will revise this Notice if there are material changes to any of its provisions or due to revision of law. If JFK revises a Notice, it will provide you with a revised Notice through your case manager, therapist or doctor or we will mail it to you at the address you supplied as long as you are still active in treatment at the time of revision. JFK reserves the right to implement the changes prior to issuing the revised Privacy Notice.

* Please note that there are special protections in place for substance abuse treatment records by Federal/State regulations. The Health Insurance Portability and Accountability Act (HIPAA) do not supersede or do away with those regulations. HIPAA may permit certain releases that a Federal/State regulation prohibits. JFK will always comply with those regulations that are most protective of client confidentiality.

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President/CEO

By my dated signature below, I verify that I have read and received a copy of the JFK Privacy Notice consisting of seven (7) pages including the signature page.

Signature of Client

Date

Print Name of Client

Signature of Parent/Guardian if under 14 years of age

Date

Print Name of Parent/Guardian if under 14 years of age

Signature of Witness

Date