

## PATIENT PRIVACY PROTECTION POLICY

In compliance with the law and Prospect Waterbury Home Health, Inc. d/b/a VNA Health at Home's commitment to its patients, it is the policy of VNA Health at Home to protect its patients' privacy.

VNA Health at Home will take reasonable steps, in accordance with the law to:

- 1) Protect the confidentiality of Social Security numbers and nonpublic personal and medical information;
- 2) Prohibit unlawful disclosure of Social Security numbers and nonpublic personal and medical information; and
- 3) Limit access to Social Security numbers and nonpublic personal and medical information.

VNA Health at Home will not authorize or condone the disclosure of any nonpublic personal information or medical information about our patients or former patients, except as permitted or required by law, or as authorized by our patients. Although complete security cannot be guaranteed, VNA Health at Home has implemented procedures to minimize the risk of access or disclosure of nonpublic personal and medical information. Nonpublic personal and medical information includes, any personally identifiable information relating to a patient's physical or mental condition, medical history or medical treatment, including names, addresses, photos, diagnoses, Social Security and other identification, registration, and account numbers, and any other nonpublic identifiable information that can be traced back to a patient. It includes all claims and financial information on a patient, whether such information is maintained in written, oral or electronic form.

VNA Health at Home has updated its policies to restrict access to nonpublic personal and medical information to those employees who need to know that information in order to provide services to our patients as well as to train its employees to protect the privacy of our patients. VNA Health at Home maintains physical, electronic, and procedural safeguards that comply with federal and state law to guard our patients' nonpublic personal information.

VNA Health at Home will destroy, erase or make unreadable nonpublic personal and medical information prior to disposal, in accordance with the retention obligation of Connecticut and Federal law, governing agencies or third party payors. VNA Health at Home may contract with a business that disposes of confidential patient information.

VNA Health at Home will take disciplinary and other measures for noncompliance with the policy. All complaints will be investigated and VNA Health at Home will take appropriate action where such action violates the law of VNA policy.

Effective October 1, 2015, subject to limited exceptions, any breach of a Connecticut resident's "personal information" triggers obligations to notify the affected person and the Connecticut Attorney General.

Notification must be made "without unreasonable delay" but no longer than ninety days from discovery of the breach. The law also requires the business to offer the affected person identity theft prevention services and, if applicable, identity theft mitigation services, for a period of at least twelve months free of charge.

**Please contact AnnMarie Garrison, President and Privacy Officer, at 860-274-7531, ext. 113, if you have any questions or to report a possible violation.**