



SPECIALIZING IN SENIOR LIVING SERVICES
1235 South 24th Street, Manitowoc, WI 54220

JOINT NOTICE OF PRIVACY PRACTICES

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.

Shady Lane, Inc. ("Shady Lane") and each of the following Shady Lane affiliates, together, designate themselves as a single Affiliated Covered Entity ("ACE") for purposes of compliance with the Health Insurance Portability and Accountability Act of 1996 ("HIPAA"): Laurel Grove Assisted Living Center, Rehab at Shady Lane and Shady Lane Nursing Care Center. Each of these entities, sites, locations and care providers will follow the terms of this Joint Notice. In addition, these entities, sites, locations and care providers may share medical information with each other for treatment, payment or health care operations related to the ACE.

Shady Lane also participates in an Organized Health Care Arrangement ("OHCA") with other covered entities. This Joint Notice is jointly used by and jointly describes the practices of all participants within the OHCA, including, without limitation:

- Any health care professional authorized to enter information into your chart.
- All departments or units of Shady Lane.
- Any member of a volunteer group we allow to help you while you are a resident or client of, or being treated at, a Shady Lane facility.
- All employees, staff or other Shady Lane personnel.

Each of the above-listed individuals or entities participating in the OHCA will follow the terms of this Joint Notice. In addition, these individuals or entities may share medical information with each other for treatment, payment or health care operations related to the OHCA.

A list of ACE and OHCA participants using this Joint Notice is available upon request. Provision of this Joint Notice to an individual by any one of the ACE or OHCA participants will satisfy requirements with respect to all other ACE or OHCA participants covered by the Joint Notice.

Shady Lane is required by law to maintain the privacy of your health information, to provide to you (or your representative) this Joint Notice of our duties and privacy practices, and to notify you (or your representative) following a breach of your unsecured health information. Shady Lane is required to abide by the terms of our Joint Notice as may be amended from time to time. Shady Lane has the right to change the terms of our Joint Notice. Any revisions to this Joint Notice will be effective for all health information that Shady Lane has created or maintained in the past, and for any records that Shady Lane creates or maintains in the future. Shady Lane will post our current Joint Notice in a prominent location in our facility, as well as on our website, www.shadylaneinc.com.

USE AND DISCLOSURE OF HEALTH INFORMATION

THE FOLLOWING IS A SUMMARY OF THE CIRCUMSTANCES UNDER WHICH AND THE PURPOSES FOR WHICH SHADY LANE MAY USE OR DISCLOSE YOUR HEALTH INFORMATION:

To Provide Treatment. Shady Lane may use or disclose your health information to treat you and coordinate your care within Shady Lane. For example, your attending physician or other health care professionals involved in your care may use information about your symptoms in order to prescribe appropriate medications. Shady Lane may also disclose your health information to individuals outside of Shady Lane involved in your care, including family members, pharmacists, suppliers of medical equipment or other health care professionals.

To Obtain Payment. Shady Lane may use or disclose your health information to bill or collect payment for services or items you receive from Shady Lane. For example, Shady Lane may be required by your health insurer to provide information regarding your health care status so that the insurer will reimburse you or Shady Lane. Shady Lane may also need to obtain prior approval from your insurer and may need to explain to the insurer your need for health care and the services that will be provided to you.

To Conduct Health Care Operations. Shady Lane may use or disclose your health information for our own operations in order to facilitate the functioning of Shady Lane and as necessary to provide quality care to all Shady Lane residents and/or clients. For example, Shady Lane may use your health information to evaluate our staff performance, combine your health information with that of other Shady Lane residents and/or clients to evaluate how we may more effectively serve all Shady Lane residents and/or clients, disclose your health information to Shady Lane staff and contracted personnel for training purposes, or use your health information to contact you or your family as part of general community information mailings. Shady Lane may also disclose your health information to a health oversight agency performing activities authorized by law, such as investigations or audits. These agencies include governmental agencies that oversee the health care system, government benefit programs, and organizations subject to government regulation and civil rights laws. In addition, Shady Lane may disclose your health information to another health care provider subject to Federal privacy protection laws, as long as the provider has or has had a relationship with you and the information is for that provider's health care operations.

For the Shady Lane Directory. If you are receiving care at a Shady Lane facility, unless you request otherwise, Shady Lane may disclose certain information about you (*e.g.*, name, general health status, and room number) that is contained in the Shady Lane directory to anyone who asks for you by name. In addition, if you provide your religious affiliation, it may be disclosed, but only to members of the clergy. Shady Lane also may include your name and room number on the directory board, and may list your name outside your room. If you do not want Shady Lane to include any or some of your information in the Shady Lane directory or outside your room, you must notify the **Shady Lane Privacy Officer at 920-682-8254**.

For Fundraising Activities. In support of our charitable mission, Shady Lane may use certain information about you (*e.g.*, demographic information, dates of health care provided, department of service information, treating physician, outcome information and health insurance status) to contact you or your family to raise money for Shady Lane. Shady Lane may also disclose this information to an organizationally-related foundation for the same purpose. You may choose to "opt-out" of receiving these fundraising communications by notifying the **Shady Lane Privacy Officer at 920-682-8254** that you do not wish to be contacted.

To Inform You About Health Information That May Be of Interest to You. Shady Lane may use or disclose your health information to tell you about or recommend possible options or alternatives for your care, or to inform you of other information that may be of interest to you.

Release of Information to Family/Friends. Unless you specifically request in writing that Shady Lane not communicate with such person(s), Shady Lane may release your health information to a family member or friend who is involved in your treatment or who is helping pay for your care.

Business Associates. Shady Lane may disclose your health information to our business associates that perform functions on our behalf or provide us with services if the information is necessary for them to provide such functions or services. Shady Lane requires our business associates to agree in writing to protect the privacy of your health information and to use and disclose your health information only as specified in that written agreement.

Health Information Exchanges. Shady Lane may participate in an arrangement of health care organizations that have agreed to work with each other to facilitate access to health information that may be relevant to your care. For example, if you are admitted on an emergency basis to a hospital that participates in the exchange and you cannot provide important information about your condition, the arrangement will allow the hospital to access the health information Shady Lane maintains about you to treat you at the hospital.

THE FOLLOWING IS A SUMMARY OF THE OTHER CIRCUMSTANCES UNDER WHICH AND THE PURPOSES FOR WHICH SHADY LANE MAY USE OR DISCLOSE YOUR HEALTH INFORMATION WITHOUT YOUR WRITTEN CONSENT OR AUTHORIZATION:

When Legally Required. Shady Lane will disclose your health information to the extent that is required to do so by any Federal, State or local law.

When There Are Risks to Public Health. Shady Lane may disclose your health information for the following public activities and purposes:

- To prevent or control disease, injury or disability, report disease, injury, vital events such as death, and the conduct of public health surveillance, investigations and interventions.

- To report adverse events or product defects, to track products or enable product recalls, repairs and replacements, and to conduct post-marketing surveillance and compliance with requirements of the Food and Drug Administration.
- To notify a person who has been exposed to a communicable disease or who may be at risk of contracting or spreading a disease.
- To an employer about an individual who is a member of the workforce, as legally required.

To Report Abuse, Neglect or Domestic Violence. Shady Lane is allowed to notify government authorities if Shady Lane reasonably believes a resident or client is the victim of abuse, neglect or domestic violence. Shady Lane will make this disclosure only when specifically required or authorized by law or when you authorize the disclosure.

To Conduct Health Oversight Activities. As permitted or required by State law, Shady Lane may disclose your health information to a health oversight agency for activities such as audits, civil, administrative or criminal investigations, inspections, and licensure or disciplinary action. If, however, you are the subject of a health oversight agency investigation, Shady Lane may disclose your health information only if it is directly related to your receipt of health care or public benefits.

In Connection With Judicial and Administrative Proceedings. As permitted or required by State law, Shady Lane may disclose your health information in the course of any judicial or administrative proceeding in response to an order of a court or administrative tribunal, as expressly authorized by such order. In certain circumstances, Shady Lane may disclose your health information in response to a subpoena, discovery request or other lawful process.

For Law Enforcement Purposes. As permitted or required by State law, Shady Lane may disclose your health information to a law enforcement official for certain law enforcement purposes, including, under certain limited circumstances, if you are a victim of a crime or in order to report a crime.

To Coroners and Medical Examiners. Shady Lane may disclose your health information to coroners and medical examiners for purposes of determining cause of death or for other duties, as authorized by law.

To Funeral Directors. Shady Lane may disclose your health information to funeral directors consistent with applicable law and, if necessary, to carry out their duties with respect to your funeral arrangements. If necessary to carry out their duties, Shady Lane may disclose your health information prior to and in reasonable anticipation of your death.

For Organ, Eye or Tissue Donation. Shady Lane may disclose your health information to organ procurement organizations or other entities engaged in the procurement, banking or transplantation of organs, eyes or tissue for the purpose of facilitating the donation and transplantation.

For Research Purposes. Shady Lane may, under very select circumstances, use or disclose your health information for research. Before Shady Lane discloses any of your health information for such research purposes, the project will be subject to an extensive approval process.

In the Event of a Serious Threat to Health and Safety. Shady Lane may, consistent with applicable law and ethical standards of conduct, disclose your health information if Shady Lane, in good faith, believes that such disclosure is necessary to prevent or lessen a serious and imminent threat to your health or safety or to the health and safety of the public.

For Specified Government Functions. In certain circumstances, the Federal regulations authorize Shady Lane to use or disclose your health information to facilitate specified government functions relating to the military and veterans, national security and intelligence activities, protective services for the President and others, medical suitability determinations, and inmates in law enforcement custody.

For Worker's Compensation. Shady Lane may release your health information for worker's compensation or similar programs.

AUTHORIZATION TO USE OR DISCLOSE YOUR HEALTH INFORMATION

Other than as stated above, Shady Lane will not use or disclose your health information other than with your written authorization. Your authorization (or the authorization of your representative) is specifically required before Shady

Lane: (1) uses or discloses your psychotherapy notes; (2) uses your health information to make a marketing communication to you for which Shady Lane receives financial remuneration from a third party, unless such communication is face-to-face or in other limited circumstances; or (3) discloses your health information in any manner that constitutes the sale of such information under HIPAA. Also, some types of health information are particularly sensitive and the law, with limited exceptions, may require that Shady Lane obtain your authorization to use or disclose that information. Sensitive information may include information dealing with genetics, HIV/AIDS, mental health, developmental disabilities, and alcohol and substance abuse. If required by law, Shady Lane will ask that you (or your representative) sign an authorization before we use or disclose such information. If you (or your representative) authorize Shady Lane to use or disclose your health information, you (or your representative) may revoke that authorization in writing at any time, except to the extent that it has already been acted upon.

YOUR RIGHTS WITH RESPECT TO YOUR HEALTH INFORMATION

You have the following rights regarding your health information that Shady Lane maintains:

Right to Receive Confidential Communications. You (or your representative) have the right to request that Shady Lane communicate with you about your health and related issues in a particular manner or at a certain location. For instance, you may ask that Shady Lane only communicate with you about your health privately, with no other family members present. All requests for confidential communications must be made in writing using the appropriate Shady Lane form. This form can be requested by contacting the **Shady Lane Privacy Officer at 920-682-8254**. Such requests shall specify the requested method of contact and/or the location where you wish to be contacted. Shady Lane will accommodate reasonable requests. You (or your representative) do not need to give a reason for your request.

Right to Request Restrictions. You (or your representative) have the right to request restrictions on certain uses and disclosures of your health information. For example, you (or your representative) have the right to request a limit on Shady Lane's disclosure of your health information to someone who is involved in your care or the payment of your care. All requests for restrictions must be made in writing using the appropriate Shady Lane form. This form can be requested by contacting the **Shady Lane Privacy Officer at 920-682-8254**. Shady Lane is not required to agree to your request; however, if we do agree, we are bound by that agreement except when otherwise required by law or in emergencies. Except as otherwise required by law, Shady Lane must agree to a restriction if: (1) the disclosure is to a health plan for purposes of carrying out payment or health care operations (and not for purposes of carrying out treatment); and (2) the health information pertains solely to a health care item or service for which Shady Lane has been paid out of pocket, in full, by you or someone else on your behalf (not the health plan). If you self-pay and request a restriction, it will apply only to those health records created on the date that you received the item or service for which you, or another person (other than the health plan) on your behalf, paid in full, and which document the item or service provided on such date.

Right to Inspect and Copy Your Health Information. You (or your representative) have the right to inspect and copy your health information, including billing records. All requests to inspect and copy records must be made in writing using the appropriate Shady Lane form. This form can be requested by contacting the **Shady Lane Privacy Officer at 920-682-8254**. If you (or your representative) request a copy of your health information, Shady Lane will provide you (or your representative) a copy of your health information in the format you (or your representative) request, unless we cannot practically do so. Shady Lane may charge a reasonable fee for any copying and assembling costs associated with your request. Shady Lane may deny your request to inspect and/or copy your health information in certain limited circumstances. If Shady Lane denies your request, you (or your representative) may request that we provide you with a review of our denial. Reviews will be conducted by a licensed health care professional who we have designated as a reviewing official, and who did not participate in the original decision to deny the request.

Right to Amend Your Health Information. If you (or your representative) believe your health information is incorrect or incomplete, you (or your representative) have the right to request that Shady Lane amend your records. That request may be made as long as Shady Lane still maintains your records, and must contain a reason for the amendment. All requests for amendments must be made in writing using the appropriate Shady Lane form. This form can be requested by contacting the **Shady Lane Privacy Officer at 920-682-8254**. Shady Lane may deny the request if it is not in writing or does not include a reason for the amendment. The request may also be denied if the requested amendment pertains to health information that was not created by Shady Lane, if the records you are requesting to amend are not part of Shady Lane's records, if the health information you wish to amend is not part of the health information you (or your representative) are permitted to inspect and copy, or if, in the opinion of Shady Lane, the records containing your health information are accurate and complete.

Right to an Accounting. You (or your representative) have the right to request an accounting of disclosures of your health information made by Shady Lane for certain purposes, which may include disclosures authorized by law. All requests for accountings must be made in writing using the appropriate Shady Lane form. This form can be requested by contacting the **Shady Lane Privacy Officer at 920-682-8254**. The request should specify the time period for the accounting, which may not be in excess of six years. Shady Lane will provide the first accounting you request during any 12-month period without charge. Subsequent accounting requests within the same 12-month period may be subject to a reasonable cost-based fee.

Right to a Paper Copy of this Joint Notice. You (or your representative) have the right to receive a separate paper copy of this Joint Notice at any time, even if you (or your representative) have received this Joint Notice previously. To obtain a separate paper copy, please contact the **Shady Lane Privacy Officer at 920-682-8254**. A copy of our current Joint Notice may also be found on our website, www.shadylaneinc.com.

Right to Breach Notification. You (or your representative) have a right to be notified of any breach of your unsecured health information. Notification of a breach may be delayed or not provided if so required by a law enforcement official. If you are deceased and there is a breach of your health information, the notice will be provided to your next of kin or personal representative if Shady Lane knows the identity and address of such individual.

CONTACT PERSON

Shady Lane has designated the **Shady Lane Privacy Officer** as its contact for all issues regarding privacy and your rights under the Federal privacy standards. If you have any questions or concerns regarding this Joint Notice or your privacy rights, you may contact the **Shady Lane Privacy Officer at 920-682-8254**. You may also write to the Shady Lane Privacy Officer at:

Shady Lane, Inc.
Attention: Privacy Officer
1235 S. 24th Street
Manitowoc, WI 54220

COMPLAINTS

Shady Lane encourages you to express any concerns you may have regarding the privacy of your information. You will not be retaliated against in any way for expressing your concerns or filing a complaint. You (or your representative) have the right to express complaints to Shady Lane or to the Secretary of Health and Human Services if you (or your representative) believe that your privacy rights have been violated. Any complaints to Shady Lane may be made by calling the **Shady Lane Privacy Officer at 920-682-8254** or by writing to **1235 S. 24th Street, Manitowoc, WI 54220**.

EFFECTIVE DATE

This Joint Notice is effective May 15, 2016.

**IF YOU HAVE ANY QUESTIONS REGARDING THIS JOINT NOTICE,
PLEASE CONTACT THE SHADY LANE PRIVACY OFFICER AT 920-682-8254.**