

FIRST STEPS KENT PRIVACY NOTICE

THIS NOTICE DESCRIBES HOW CLIENT INFORMATION ABOUT YOU MAY BE USED AND DISCLOSED AND HOW YOU CAN GET ACCESS TO THIS INFORMATION. PLEASE REVIEW IT CAREFULLY.

WHO WE ARE AND WHO WILL FOLLOW THIS NOTICE

When this Notice refers to “we” or “First Steps Kent”, it is referring to First Steps Kent, a Michigan Nonprofit corporation, together with all First Steps Kent employees, staff, volunteers, and persons or entities performing services for First Steps Kent under agreements containing privacy protections or to which disclosure of client information is permitted by law.

OUR PLEDGE AND PRIVACY OBLIGATIONS

First Steps Kent is committed to protecting the confidentiality of your client information. We will access your client records for purposes of the operating any First Steps Kent’s programs (the “Programs”), including each of the following First Steps Kent programs that are presently in existence:

1. Children’s Healthcare Access Program;
2. Prevention Grant Programs under Department of Human Services; and
3. Welcome Home Baby.

We need this record to be able to pursue the Programs and to comply with certain legal requirements. This notice will inform you as to the ways we may use and disclose information about you and your health (“client information”). This notice also describes your rights and certain obligations we have regarding the use and disclosure of your client information.

This notice applies to all of the records of your care that your hospital, your physician or First Steps Kent personnel may generate. Your doctor may have different policies or notices regarding the doctor’s use and disclosure of your client information created in the doctor’s office or clinic.

The Health Insurance Portability and Accountability Act (“HIPAA”) requires that we maintain the privacy of your client information and provide you this notice as to our legal duties and privacy practices with respect to client information. When we use or disclose client information, we are required to abide by the terms of this notice. We reserve the right to change our privacy practices and this notice. We reserve the right to make the revised or changed notice effective for client information we already have about you as well as any information we receive in the future. Our current notice may be accessed on the First Steps Kent web page at www.firststepskent.org You may also receive current copies of our notice by sending a written request to our privacy officer.

If you have any questions about this notice, contact the First Steps Kent Privacy Officer at (616) 752-8638, or by writing to First Steps Kent Privacy Officer, 118 Commerce Ave. S.W., Grand Rapids, Michigan 49503

USES AND DISCLOSURES OF CLIENT INFORMATION

The following sections describe different ways that we may use and disclose your client information. For each category of uses or disclosures we will explain what we mean and attempt to provide an example. Not every use or disclosure in a category will be listed. However, all of the ways we are permitted to use and disclose information will fall within one of the categories.

1. For Treatment. We will use and disclose your client information to provide you with access to medical treatment and services. We may disclose client information about you to doctors, nurses, technicians, students, or other health care personnel who are involved in your care.
2. For Payment. Your client information will be used, as necessary, to obtain payment in connection with your health care services, whether through grants or otherwise.
3. For Health Care Operations. We may use and disclose your client information to conduct our health care operations. These uses and disclosures are necessary to the business activities of First Steps Kent.
4. Health-Related Benefits and Services. We may use and disclose client information to tell you about health-related benefits or services that may be of interest to you.
5. Fundraising Activities. We may use your client information to contact you to provide information about First Steps Kent sponsored activities, including fundraising programs and events. We may disclose client information to a foundation related to First Steps Kent so that the foundation may contact you about fundraising programs and events. We only would release contact information, such as your name, address and phone number and the dates you received treatment or services through us. If you do not want us to contact you about our fundraising efforts, you must notify us in writing by forwarding your request to: First Steps Kent Privacy Officer, 118 Commerce Ave. S.W., Grand Rapids, Michigan 49503.
6. Individuals Involved in Your Care or Payment for Your Care. We may release client information about you to a friend, family member, or personal representative who is involved in your medical care or payment for your care.
7. As Required By Law. We will disclose client information about you when required to do so by federal, state or local law.
8. To Avert a Serious Threat to Health or Safety. We may use and disclose client information about you when necessary to prevent a serious threat to your health and safety or the health and safety of the public or another person. Any disclosure would be limited to someone able to help prevent the threat.

SPECIAL SITUATIONS

1. Workers' Compensation. We may disclose your client information as authorized to comply with workers' compensation laws and other similar programs established by law.
2. Public Health Disclosures. We may disclose your client information for public health activities and purposes to a public health authority authorized by law to collect or receive information. These activities generally include:

- a. Preventing or controlling disease, injury or disability;
 - b. Reporting vital events such as births and deaths;
 - c. Reporting suspected instances of child abuse, endangerment, or neglect;
 - d. Reporting reactions to medications or problems with products;
 - e. Notifying people of recalls of products they may be using;
 - f. Notifying a person who may have been exposed to a disease or may be at risk for contracting or spreading a disease or condition, where authorized by law;
 - g. Notifying the appropriate government authority if we believe a patient has been the victim of abuse, neglect or domestic violence and this disclosure is made as authorized or required by law.
3. Health Oversight Activities. We may disclose your client information to health oversight agencies for activities authorized by law such as audits, investigations, inspections, and licensure activities.
 4. Lawsuits and Disputes. In connection with lawsuits or other legal proceedings, we may disclose your client information in response to a court or administrative order, or in response to a subpoena, discovery request, warrant, or other lawful process.
 5. Law Enforcement. Where requested by law enforcement, and as authorized or required by law, we may disclose client information:
 - a. In response to a court order, subpoena, warrant, summons or similar process;
 - b. In response to limited requests for information necessary to identify or locate a suspect, fugitive, material witness, or missing person;
 - c. About a suspected victim of a crime if the individual agrees to the disclosure and, under certain circumstances, where we are unable to obtain the person's agreement;
 - d. About a death we suspect may be the result of criminal conduct;
 - e. In emergency circumstances to report a crime; the location of the crime or victims; or the identity, description or location of the person who committed the crime.
 6. Inmates. If you are an inmate of a correctional facility or under the custody of law enforcement officials, we may disclose your client information to the correctional institution or officials as authorized or required by law.

YOUR RIGHTS REGARDING YOUR CLIENT INFORMATION

You have the following rights regarding client information we maintain about you:

7. Right to Inspect and Copy. With certain exceptions, you have the right to inspect and copy your client information for as long as we maintain that information. To inspect and copy client information that may be used to make decisions about you, you must submit your request in writing to First Steps Kent Privacy Officer, 118 Commerce Ave. S.W., Grand Rapids, Michigan 49503. If you request a copy of the information, we may charge a fee for the costs of copying, mailing or other supplies associated with your request.
8. Right to Request an Amendment or Addendum. If you feel that client information we have about you is incorrect or incomplete, you may ask us to amend the information or add an addendum (addition to the record). You have the right to request an amendment or addendum for as long as the information is kept by or for First Steps Kent.

To request an amendment, your request must be made in writing and submitted to First Steps Kent Privacy Officer, 118 Commerce Ave. S.W., Grand Rapids, Michigan 49503. In addition, you must provide a reason that supports your request.

We may deny your request for an amendment if it is not in writing or does not include a reason to support the request. In addition, we may deny your request if you ask us to amend information that:

- a. Was not created by us;
 - b. Is not part of the client information kept by or for First Steps Kent;
 - c. Is not part of the information which you would be permitted to inspect and copy; or
 - d. Is accurate and complete.
9. Right to an Accounting of Disclosures. You have the right to request an "accounting of disclosures". This is a list of the disclosures we made of your client information. This right does not apply to disclosures made for purposes of treatment, payment, and health care operations or disclosures that are subject to certain restrictions, exceptions, and limitations imposed by law.

To request an accounting of disclosures, you must submit your request in writing to First Steps Kent Privacy Officer, 118 Commerce Ave. S.W., Grand Rapids, Michigan 49503. Your request should indicate in what form you want the list (for example, on paper, electronically). The first list you request within a 12 month period will be free. For additional lists, we may charge you for the costs of providing the list. We will notify you of the cost involved and you may choose to withdraw or modify your request at that time before any costs are incurred.

We will ordinarily respond to your request for an accounting within 30 days. If we require additional time to prepare the accounting you have requested, we will notify you in writing about the reason for the delay and the date you can expect to receive the accounting.

10. Right to Request Restrictions. You have the right to request a restriction or limitation on the client information we use or disclose about you for treatment, payment or health care

operations. You also have the right to request a limit on the client information we disclose about you to someone who is involved in your care or the payment for your care, like a family member or friend. For example, you could ask that we not use or disclose information about a surgery you had.

We are not required to agree to your request. If we do agree, our agreement must be in writing and we will comply with your request unless the information is needed to provide you emergency treatment.

To request a restriction, you must make your request in writing to the First Steps Kent Privacy Officer, 118 Commerce Ave. S.W., Grand Rapids, Michigan 49503. In your request, you must tell us (1) what information you want to limit; (2) whether you want to limit our use, disclosure or both; and (3) to whom you want the limits to apply, for example, disclosures to your spouse.

11. Right to Request Confidential Communications. You have the right to request that we communicate with you about medical matters in a more confidential way by requesting that we communicate with you by alternative means or at alternative locations. For example, you can ask that we only contact you at home or by mail.

To request more confidential communications, please make your request in writing to First Steps Kent Privacy Officer, 118 Commerce Ave. S.W., Grand Rapids, Michigan 49503. We will not ask you the reason for your request, and we will try to accommodate reasonable requests. Please specify in your request how or where you wish to be contacted, and how payment for your health care will be handled if we communicate with you through the requested alternative method or location.

12. Right to a Paper Copy of This Notice. You have the right to a paper copy of this Notice. You may ask us to give you a copy of this Notice at any time. Even if you have agreed to receive this Notice electronically, you are still entitled to a paper copy of this Notice.

You may obtain a copy of this notice at our website, <http://www.firststepskent.org/> or by writing First Steps Kent Privacy Officer, 118 Commerce Ave. S.W., Grand Rapids, Michigan 49503.

COMPLAINTS

If you believe your privacy rights have been violated, you may file a complaint with First Steps Kent or with the Secretary of the Department of Health and Human Services. To file a written complaint with First Steps Kent, contact First Steps Kent Privacy Officer, 118 Commerce Ave. S.W., Grand Rapids, Michigan 49503.

You will not be penalized for filing a complaint.

OTHER USES OF CLIENT INFORMATION

Other uses and disclosures of client information not covered by this notice or the laws that apply to us will be made only with your written authorization, giving us permission for such uses or disclosures. If you provide us permission to use or disclose client information about you, you may revoke that permission, in writing, at any time, by contacting First Steps Kent Privacy

Officer, 118 Commerce Ave. S.W., Grand Rapids, Michigan 49503. If you revoke your permission, we will no longer use or disclose client information about you for the reasons covered by your written authorization. We are unable to take back any disclosures we have already made with your permission, and we will retain our records of the care that we provided to you as required by law.