

Divisions: All Divisions	Policy Number 179.10.14
Subject: NOTICE OF PRIVACY PRACTICES (Provision)	
Approved: Executive Director	
Approved: Associate Director	
Approved: CADE BOD	
Effective Date: April 14, 2003	
Review Dates:	
Revised Dates:	

Purpose

HIPAA requires that notice be given to individuals of the use and disclosure of protected health information as well as the individual's rights and R6as thiproviders.

Policy

1. Center for Advanced Dental Education will provide a formal notice to individuals regarding the use or disclosure of protected health information pursuant to HIPAA regulation 164.520.
2. The provision of the notice given to individuals regarding the use and disclosure of protected health information pursuant to regulation 164.520 will comply with the policies and procedures described herein.

Procedures

1. The notice will be provided to individuals with whom Center for Advanced Dental Education has a direct treatment relationship as follows:
 - a. No later than the date of the first service delivery, including service delivered electronically, to such individual after the compliance date for the covered health care provider;
 - b. Upon request;
 - c. On or after the effective date of a revision;
 - d. Promptly available at the service delivery site for individuals to request and to take with them;
 - e. Posted in a clear and prominent location where it is reasonable to expect individuals seeking service from the covered health care provider to be able to read the notice;
 - f. Automatically and contemporaneously for electronic notices, when the response is to the individual's first request for service and the first service delivery is delivered electronically. The individual who is the recipient of electronic notice must also be permitted to retain the right to obtain a paper copy of the notice upon request.
2. For Saint Louis Center's physical service delivery sites the notice will be:
 - a. Available at the service delivery site for individuals to request and to take with them
 - b. Posted in a clear and prominent location where it is reasonable to expect individuals seeking service to be able to read the notice.
3. Center for Advanced Dental Education will only use a joint notice when both it and the other covered entities participating in the organized health care arrangement agree to abide by the terms of the notice with respect to protected health information created or received by the Center as part of its participation in the organized health care arrangement.
4. All joint notices will:
 - a. Contain all of the specifications required of a single-entity notice and describe with reasonable specificity the covered entities, or class of entities, and service delivery sites, or classes of service

- delivery sites, to which the joint notice applies;
 - b. Contain all of the specifications required of a single-entity notice and, if applicable, state that the covered entities participating in the organized health care arrangement will share protected health information with each other, as necessary to carry out treatment payment, or health care operations relating to the organized health care arrangement;
 - c. Be provided to individuals within the same requirements as a single-entity notice.
5. Center for Advanced Dental Education will prominently post its notice on any web sites that it maintains that provides information about its customer services or benefits, and make the notice available electronically through the web site.
6. When providing the notice to an individual by e-mail, Center for Advanced Dental Education will:
- a. Ensure that the individual has agreed to electronic notice and such agreement has not been withdrawn;
 - b. Provide a paper copy of the notice to the individual if the Center knows that an e-mail transmission of the electronic notice has failed.
7. Center for Advanced Dental Education will document compliance with and maintain the notice, or joint notice as applicable, by retaining copies of the notices issued by the Center, for a period of at least six years from the date of its creation or the date when it last was in effect, whichever is later.
8. Knowledge of a violation or potential violation of this policy must be reported directly to the Privacy Officer, Compliance Officer, or to the employee compliance hotline.