

Saltillo Notice of Privacy Practice

Saltillo Corporation is a provider of Assistive Technology Equipment. Through these activities Saltillo collects, uses, and discloses personal health information to carry out its mission. This information is private and confidential. There are policies and procedures in place to protect the information against unlawful use and disclosure. This notice provides you with other important information, including how to contact us with questions about this notice or our privacy practices.

I. What is this notice?

This notice describes information we collect, how we use that information, and when and to whom we may disclose it.

II. What is "Personal Health Information"?

Personal Health Information or "PHI" is current, past, or future information created or received by Saltillo through health care providers, health plans, distributors, and other contractors. It relates to the physical or mental condition of a patient, the provision of equipment to that person, or payment for equipment. The term PHI does not generally include publicly available information, or information available or reported in a summarized or grouped manner.

III. What types of personal health information does Saltillo collect?

Saltillo collects PHI through interactions with you and your health care providers. It can be obtained through applications, interviews, surveys, and other forms. PHI may be obtained in writing, in person, by telephone and electronically. In order to process your equipment request, Saltillo will collect or create information including your name, address, telephone number, social security number, date of birth, medical history, diagnosis, treatment, provider identification, financial responsibility and payment information, and family and advocate contact information.

IV. How does Saltillo protect personal health information within Saltillo?

Access to PHI is restricted to only those employees who need it to provide services or products to our clients. We maintain physical, technical and procedural safeguards to protect PHI against unauthorized use and disclosure. We have a Privacy Officer who is responsible for developing, educating Saltillo personnel about, and overseeing the implementation and enforcement of policies and procedures designed to safeguard PHI against inappropriate use and disclosure consistent with the applicable law.

V. What personal health information does Saltillo disclose to third parties, and for what purposes?

To provide equipment, we use PHI internally and also may disclose it to our billing affiliates (e.g., Prentke Romich Company), health care providers (doctors, and other caregivers), insurers, third party administrators, and other payors (employers, health care provider organizations, and others who may be responsible for paying for your equipment), vendors, consultants, government authorities; and their respective agents. They are required by law to keep PHI confidential. Saltillo follows a policy of minimum necessary disclosure, which limits the disclosure of PHI to the minimum amount necessary to accomplish the stated purpose. Some examples of what we do with the information we collect and the reasons it might be disclosed to third parties are described below.

Treatment or Provision of Equipment: We may use or disclose PHI with or without your consent to provide equipment. Saltillo uses and discloses PHI without specific consent to provide, coordinate and manage the purchase or rental of equipment by customers. These activities include coordination by Saltillo with billing affiliates (e.g., Prentke-Romich Company).

Payment: Saltillo uses and discloses PHI to obtain reimbursement for purchased or rental equipment. For example, we may contract with a third-party billing agent (e.g., Prentke Romich Company) to process a claim. All third-party billing agents also adhere to this Privacy Practice. Other activities include claims management, collections activities, coordinating benefits among various payors, recovering payments from third parties liable for coverage; risk adjustment; and, disclosures to consumer reporting agencies. We may use or disclose PHI in connection with payment activities with or without your consent.

Reminders: We may contact you to give you information about your device purchase

Family and Friends: Under certain circumstances, we may disclose PHI to family members, advocates or others that you identify to the extent it is directly relevant to their involvement with your care or payment related to your care.

Required by Law: We may use or disclose PHI to the extent such use or disclosure is required by law and that the disclosure complies with and is limited to the requirements of that law. We also use and disclose PHI for certain law enforcement purposes and in response to official subpoenas, court orders, discovery requests and other legal process. In addition, we use and disclose PHI in connection with health oversight activities (e.g., government audits of our compliance with certain laws and regulations; oversight of government-funded health benefits programs, etc.)

Ohio Law: Our use and disclosure of PHI must comply not only with federal privacy regulations but also with applicable Ohio law. Ohio law provides different and sometimes more stringent protections to PHI than federal regulations. Examples of these protections include: (i) special protections for sensitive information, such as information about HIV/AIDS, treatment for psychiatric conditions or substance abuse problems, and certain genetic information; (ii) a bar against redisclosure of PHI collected by third party administrators of health plans for certain purposes; and (iii) a prohibition against making changes to medical records that would conceal or alter prior entries (even if inaccurate).

VI. Why is it important that personal health information be used and disclosed as described above?

The activities described above are necessary to effectively provide equipment to customers.

VII. What does a person need to do to request other disclosures of personal health information?

Many patients and health plan members ask us to disclose PHI to people in ways not described above. For example, an adult person with a disability may want us to make her records available to a neighbor who is helping her resolve a question about her care or payment for that care. If you fill out a form and later change your mind about the special authorization, you may send a letter to us at the address listed on the form to let us know that you would like to revoke the special authorization. In any communication with us, please provide your name, address, patient or member identification number or Social Security number, and a telephone number where we can reach you in case we need to contact you about your request.

VIII. What other rights does a person have with respect to Personal Health Information (PHI), and how can the person exercise those rights?

You have a right to ask us in writing to restrict use or disclosure of your PHI related to your equipment or your payment for equipment. In addition, you may request PHI disclosure restrictions to family members, advocates or others involved in your care. We are not required to agree to such a restriction, but if we do agree, we will honor our agreement except in case of an emergency. Any restriction we agree to is not effective to prevent uses or disclosures of PHI (i) required by the Secretary of the Department of Health and Human Services to investigate or determine our compliance with federal privacy regulations adopted under the Health Insurance Portability and Accountability Act of 1996; or (ii) for certain activities permitted or required by law (see Section V above).

You have a right to review and obtain a copy of existing PHI contained in (i) medical and billing records about you maintained by Saltillo; and (ii) records used by or for Saltillo to make decisions about you. You must make your request in writing and this right is limited to existing records that are maintained, collected, used or disseminated by Saltillo. It does not apply to information we compile in reasonable anticipation of, or for use in, civil, criminal or administrative actions or proceedings. We may charge a fee for any copies you request.

You have a right to request that we amend the records described above for as long as we maintain them. You must make the request in writing and give us a reason for the amendment. We may deny your request if: (i) we determine that we did not create the record, unless the originator of the PHI is no longer available to act on the requested amendment; or (ii) if we believe that the existing records are accurate and complete. Note that an amendment may take several forms, for example we may add an explanatory statement to a record rather than changing it.

You have a right to receive an accounting of disclosures made by Saltillo to any third party in the six years prior to the date on which the accounting is requested. This right does not apply to certain disclosures, including, but not limited to, disclosures made for the purposes of treatment or payment; disclosures made to you or to others involved in your care; disclosures made with your authorization; disclosures made for national security or intelligence purposes or to correctional institutions or law enforcement purposes; or disclosures made prior to April 14, 2003. You must make any request for an accounting in writing and we may charge a fee to fill more than one request in any given year.

You have the right to request that we communicate with you about medical matters in a certain way or at a certain location. For example, you can ask that we only contact you at work or by mail. To request confidential communications, you must make your request in writing. We will not ask you the reason for your request. We will accommodate all reasonable requests. Your request must specify how or where you wish to be contacted.

IX. What does Saltillo do with personal health information about clients who are no longer affiliated with Saltillo?

Saltillo does not necessarily destroy PHI when individuals terminate their relationships with us. In many cases, the information is subject to legal retention requirements. However, the policies and procedures that protect all PHI against inappropriate use and disclosure apply regardless of the status of any individual whose information is maintained.

X. How is this notice distributed and updated?

Saltillo posts this notice on our internet site at www.saltillo.com and distributes this notice To individuals who have submitted equipment purchase requests upon the receipt of submission; or, upon contact with a Saltillo representative for purposes of evaluation. An individual may also received this notice upon request (see Section XII for contact information). We reserve the right to change the terms of this notice. Any changes will be effective for all PHI that we maintain.

XI. What more do I need to know about my privacy rights?

Saltillo is required by law to maintain the privacy of Personal Health Information and to provide individuals with notice of its legal duties and privacy practices with respect to that information. We are required to abide by the terms of the notice currently in effect.

XII. What should I do if I want a paper copy of this notice, if I have questions about it, or if I think my privacy rights have been violated?

If you would like a paper copy of this notice, have questions about it, or believe its terms or any Saltillo privacy or confidentiality policy has been violated with respect to information about you, please let us know immediately. You will not be penalized for filing a complaint. If you have a question or wish to file a complaint, you may contact us at:

Saltillo Privacy Officer
2143 Township Road #112
Millerburg OH 44654
800-382-8622

Please include your name, address, and a telephone number where we can contact you, and a brief description of your concern.

If you prefer, you may lodge an anonymous complaint. You also may contact the Secretary of the Department of Health and Human Services at:

The U.S. Department of Health and Human Services
200 Independence Avenue S.W.
Washington D.C. 20201
(202) 619-0257
Toll Free: 1-877-696-6775

Please provide as much information as possible so that the complaint can be properly investigated. Saltillo will not retaliate against a person who files a complaint with us or with the Secretary of the Department of Health and Human Services.