

# Notice of Privacy Practices

**This notice describes how health information about you may be used and disclosed, and how you can get access to this information. Please review it carefully. AllWays Health Partners provides health insurance coverage to you. Because you get health benefits from AllWays Health Partners, we have personal health information (PHI) about you. By law, AllWays Health Partners must protect the privacy of your health information.**

**This notice explains:**

- When AllWays Health Partners may use and share your health information.
- What your rights are regarding your health information.

**AllWays Health Partners may use or share your health information:**

- When the U.S. Department of Health and Human Services needs it to make sure your privacy is protected.
- When required by law or a law enforcement agency.
- For payment activities, such as checking if you are eligible for health benefits, and paying your healthcare Providers for services you get.
- To operate programs, such as evaluating the quality of healthcare services you get, providing care management and disease management services and performing studies to reduce healthcare costs.
- With your healthcare Providers to coordinate your treatment and the services you get.
- With health-oversight agencies, such as the Federal Centers for Medicare and Medicaid Services, and for oversight activities authorized by law, including fraud and abuse investigations.
- For health research.
- With government agencies that give you benefits or services.

- With plan sponsors of employer group health plans, but only if they agree to protect that information.
- To prevent or respond to an immediate and serious health or safety emergency.
- To remind you of appointments, benefits, treatment options or other health-related choices you have.
- With entities that provide services or perform functions on behalf of AllWays Health Partners (Business Associates), provided that they have agreed to safeguard your information.

When a federal or state privacy law provides for stricter safeguards of your PHI, AllWays Health Partners will follow the stricter law. Except as described above, AllWays Health Partners cannot use or share your health information with anyone without your written permission. You may cancel your permission at any time, as long as you tell us in writing. Please note: We cannot take back any health information we used or shared when we had your permission.

For purposes of underwriting, AllWays Health Partners is prohibited from using or disclosing any genetic information.

AllWays Health Partners does not use your health information for any marketing purposes and will not sell your health information to anyone.

**You have the right to:**

- See and get a copy of your health information that is contained in a “designated record set.” You must ask for this in writing. To the extent your information is held in an electronic health record, you may be able to receive the information in electronic form. In some cases, we may deny your request to see and get a copy of your health information. AllWays Health Partners may charge you to cover certain costs, such as copying and postage.

- Ask AllWays Health Partners to change your health information that is in a “designated record set” if you think it is wrong or incomplete. You must tell us in writing which health information you want us to change, and why. If we deny your request, you may file a statement of disagreement with us that will be included in any future disclosures of the disputed information.
- Ask AllWays Health Partners to limit its use or sharing of your health information. You must ask for this in writing. AllWays Health Partners may not be able to grant this request.
- Ask AllWays Health Partners to get in touch with you in some other way, if by contacting you at the address or telephone number we have on file, you believe you would be harmed.
- Get a list of when and with whom AllWays Health Partners has shared your health information. You must ask for this in writing.
- Be notified in the event that we or one of our Business Associates discovers a breach of your unsecured protected health information.
- Get a paper copy of this notice at any time.

These rights may not apply in certain situations.

This notice, effective as of April 17, 2019, will remain in effect until we change it. By law, AllWays Health Partners must give you notice explaining that we protect your health information, and that we must follow the terms of this notice.

This notice will remain in effect until we change it. This notice replaces any other information you have previously received from AllWays Health Partners about the privacy of your health information. AllWays Health Partners can change how we use and share your health information.

If AllWays Health Partners does make important changes, we will send you a new notice and post an updated notice on our website. That new notice will apply to all of the health information that AllWays Health Partners has about you. AllWays Health Partners takes your privacy very seriously. If you would like to exercise any of the rights we describe in this notice, or if you feel that AllWays Health Partners has violated your privacy rights, contact our Privacy Officer in writing at the following address:

AllWays Health Partners  
Privacy Officer  
399 Revolution Drive, Suite 810  
Somerville, MA 02245

Filing a Complaint or exercising your rights will not affect your benefits. You may also file a Complaint with the U.S. Secretary of Health and Human Services at:

The U.S. Department of Health and Human Services  
200 Independence Avenue, SW  
Washington, DC 20201  
Telephone: 202-619-0257  
Toll Free: 877-696-6775

AllWays Health Partners will not retaliate against you if you file a complaint either with AllWays Health Partners or the U.S. Secretary of Health and Human Services. For more information, or if you need help understanding this notice, call our Member Service Center at 800-462-5449 or TTY 711, Monday through Friday between 8:00 AM and 6:00 PM (Thursdays from 8:00 AM to 8:00 PM)

## Confidentiality

AllWays Health Partners takes seriously our obligation to protect your personal and health information. To help in maintaining your privacy, we have instituted the following practices:

- AllWays Health Partners employees do not discuss your personal information in public areas such as the cafeteria, on elevators or when outside of the office.
- Electronic information is kept secure through the use of passwords, automatic screen savers and limiting access to only those employees with a “need to know.”
- Written information is kept secure by storing it in locked file cabinets, enforcing “clean-desk” practices and using secured shredding bins for its destruction.
- All employees, as part of their initial orientation, receive training on our confidentiality and privacy practices. In addition, as part of every employee’s annual performance appraisal, they are required to sign a statement affirming that they have reviewed and agree to abide by our confidentiality policy.

- All providers and other entities with whom we need to share information are required to sign agreements in which they agree to maintain confidentiality.
- AllWays Health Partners only collects information about you that we need to have in order to provide you with the services you have agreed to receive by enrolling in AllWays Health Partners or as otherwise required by law.

In accordance with state law, AllWays Health Partners takes special precautions to protect any information concerning mental health or substance abuse, HIV status, sexually transmitted diseases, pregnancy or termination of pregnancy.