

R.J. ROSENBERG ORTHOPEDIC LAB, INC.

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.

If you have any questions about this Notice please contact our Privacy Contact, Tammy Henschen, at 513-221-7200.

OUR COMMITMENT TO PROTECT YOUR HEALTH INFORMATION

This Notice of Privacy Practices describes how we may use and disclose your protected health information to carry out treatment, payment or health care operations and for other purposes that are permitted or required by law. It also describes your rights to access and control your protected health information. Your "protected health information" means any of your written and oral health information, including your demographic data that can be used to identify you. This is health information that is created or received by your health care provider, and that relates to your past, present or future physical or mental health or condition. We are strongly committed to protecting your medical information. We create a medical record about your care because we need the record to provide you with appropriate treatment and to comply with various legal requirements. We transmit some medical information about your care in order to obtain payment for the services you receive, and we use certain information in our day-to-day operations. This Notice will let you know about the various ways we use and disclose your medical information, describe your rights and our obligations with respect to the use or disclosure of your medical information. We will also ask that you acknowledge receipt of this Notice the first time you come to or use one of our facilities, because the law requires us to make a good faith effort to obtain your acknowledgment.

We are required by law to:

Make sure that any medical or health information that we have that identifies you is kept private, and will be used or disclosed only in accord with this Notice of Privacy Practices and applicable law; Give you this Notice of our legal duties and our privacy practices; and Abide by the terms of the Notice of Privacy Practices that is in effect from time to time.

1. USES AND DISCLOSURES OF PROTECTED HEALTH INFORMATION

A. Uses and Disclosures of Protected Health Information for Treatment, Payment and Healthcare Operations

Your protected health information may be used and disclosed by your Orthotist or Prosthetist, our office staff and others outside of our office who are involved in your care and treatment for the purpose of providing health care services to you. Your protected health information may also be used and disclosed to pay your health care bills and to support the operation of R.J. Rosenberg Orthopedic Lab, Inc.

The following are examples of the types of uses and disclosures of your protected health care information in which R.J. Rosenberg Orthopedic Lab, Inc. is permitted to make. We have provided some examples of the types of each use or disclosure we may make, but not every use or disclosure in any of the following categories will be listed.

For Treatment: We will use and disclose your protected health information to provide, coordinate, or manage your health care and any related treatment. This includes the coordination or management of your health care with a third party that has already obtained your permission to have access to your protected health information. For example, we would disclose your protected health information, as necessary, to the physician that referred you to us. We will also disclose protected health information to other health care providers who may be treating you when we have the necessary permission from you to disclose your protected health information.

For Payment: Your protected health information will be used, as needed, to obtain payment for your health care services. This may include certain activities that your health insurance plan may

undertake before it approves or pays for the health care services we recommend for you such as; making a determination of eligibility or coverage for insurance benefits, reviewing services provided to you for medical necessity, and undertaking utilization review activities. We may also tell your health plan about an orthotic or prosthetic device you are going to receive to obtain prior approval or to determine whether your plan will cover the device.

For Healthcare Operations: We may use or disclose, as needed, your protected health information in order to support the business activities of R.J. Rosenberg Orthopedic Lab, Inc. These activities include, but are not limited to, quality assessment activities, employee review activities, legal services, licensing, and conducting or arranging for other business activities. We may share your protected health information with third party "business associates" that perform various activities (e.g., billing, transcription services) for our company, R.J. Rosenberg Orthopedic Lab, Inc. Whenever an arrangement between R.J. Rosenberg Orthopedic Lab, Inc. and our business associate involves the use or disclosure of your protected health information, we will have a written contract that contains terms that will protect the privacy of your protected health information.

Treatment Alternatives: We may use or disclose your protected health information, as necessary, to provide you with information about treatment alternatives or other health-related benefits and services that may be of interest to you.

Appointment Reminders: We may use or disclose your protected health information, as necessary, to contact you to remind you of your appointment.

Sign In Sheets: We may use a sign-in sheet at the registration desk where you will be asked to sign your name. We may also call you by name in the waiting room when your Orthotist or Prosthetist is ready to see you.

Marketing and Health Related Benefits and Services: We may also use and disclose your protected health information for other marketing activities. For example, we may send you information about products or services that we believe may be beneficial to you. You may ... contact our Privacy Contact to request that these materials not be sent to you.

Sale of the Practice: If we decide to sell this practice or merge or combine with another practice, we may share your protected health information with the new owners.

Required by Law: We may use or disclose your health information when we are required to do so by law.

Public Health: We may disclose your protected health information for public health authority that is permitted by law to collect or receive the information. The disclosure will be made for the purpose of controlling disease, injury or disability. A disclosure under this exception would only be made to somebody in a position to help prevent the threat to public health.

Communicable Diseases: We may disclose your protected health information, if authorized by law, to a person who may have been exposed to a communicable disease or may otherwise be at risk of contracting or spreading the disease or condition.

Health Oversight: We may disclose protected health information to a health oversight agency for activities authorized by law, such as audits, investigations and inspections. Oversight agencies seeking this information include government agencies that oversee the healthcare system, government benefit programs, other government regulatory programs and civil rights laws.

Abuse or Neglect: We may disclose your health information to appropriate authorities if we reasonably believe you are possibly being abused by neglect, domestic violence or a victim of crime.

Military and Veterans: If you are a member of the military, we may release protected health information about you as required by military command authorities.

Legal Proceedings: We may disclose your protected health information in the course of any judicial or administrative proceeding, in response to an order of a court or administrative tribunal (to the extent such disclosure is expressly authorized), in certain conditions in response to a subpoena, discovery request or other lawful process.

Law Enforcement: We may disclose your protected health information, so long as applicable legal requirements are met, for law enforcement purposes. These law enforcement purposes might include legal process and otherwise required by law, limited information requests for identification and location purposes, pertaining to victims of a crime, suspension that death has occurred as a result of criminal conduct, in the event that a crime occurs on the premises of the practice and medical emergency, where it is likely that a crime has occurred, on or off of the R.J. Rosenberg Orthopedic Lab, Inc. premises.

Research: Under certain circumstances, we may disclose your protected health information to researchers when an institutional review board that has reviewed the research proposal and established protocols to ensure the privacy of you protected health information as approved their research.

Criminal activity: Consistent with applicable federal and state laws, we may disclose your protected health information, if we believe that the use or disclosure is necessary to prevent or lessen a serious and imminent threat to the health or safety of a person or the public. We may also disclose protected health information if it is necessary for law enforcement authorities to identify or apprehend an individual.

Workers' Compensation: We may disclose your protected health information as authorized to comply with worker' compensation laws and other similar legally established programs that provide benefits for work-related injuries.

Required Uses and Disclosures: Under the law, we must make disclosures to you and when required by the Secretary of the Department of Health and Human Services to investigate or determine our compliance with the requirements, of the final rule on Standards for Privacy of Individual Identifiable Health Information.

PATIENT RIGHTS

Access: You have the right to obtain copies of your health information with limited exceptions. You may request that we provide copies in a format other than photocopies. We will use the format you request unless we cannot do so for practicality reasons. It will be necessary for you to make a request in writing to obtain your health information. You may obtain a form to request your health information from the Privacy contact listed in the beginning and end of this noticed.

Disclosure Accounting: You have the right to receive a list of instances in which your health information may have been disclosed for purposes other than treatment, payment of healthcare operations. Your request can be for activities for the past 6 years, but not for dates prior to to this. For requests that are made more than once in a 12-month period, we will charge a fee for responding to and providing you with these additional requests.

Restriction: You have the right to request that we place certain restrictions on our use or disclosure of your health information. We are not required by law to concur to these restrictions, but if we do, we will abide by our agreement (except in an emergency).

Alternative Communication: You have the right to request to receive confidential communications from you by alternative means or at an alternative location. We will accommodate reasonable requests. We may also condition this accommodation by asking you for information as to how payments will be handled or specification of an alternative address or other method of contact. We will not request an explanation from you as a basis for the request. Please make this request in writing to our Privacy Contact.

Amendment: You have the right to request that we amend your health information. Your request must be in writing and must explain why the information should be amended. We may deny any request.

Questions and Complaints:

You may complain to us or to the U.S. Department of Health and Human Services, secretary of health, if you believe we have violated your privacy rights. The address will be provided to you. You may file a complaint with us by notifying our privacy contact of your complaint. We will not retaliate against you in any way for filing a complaint with the U.S. Dept. of Health and Human Services or with R.J. Rosenberg Orthopedic Lab, Inc.

Privacy Officer:
Richard J. Rosenberg

Privacy Contact:
Tammy Henschen

Company: R.J. Rosenberg Orthopedic Lab, Inc.
3366 Central Parkway
Cincinnati, OH 45225

Phone: (513) 221-7200

Web site: www.oandp.com/Rosenberg

Changes to this Notice: We reserve the right to change the privacy practices that are described in this Notice of Privacy Practices. We also reserve the right to apply these changes retroactively to Protected Health Information received before the change in privacy practices. You may obtain a revised Notice of Privacy Practices by calling the office and requesting a revised copy be sent in the mail, asking for one at the time of your next appointment or accessing our Web site.

This notice was published and became effective on November 5, 2008.