PROCEDURE STATEMENT:
Health Quest Systems, Inc. and its affiliates (“HQ”) ensure that there is an updated, posted Notice of Privacy Practices (“Notice”) in all of its sites, so as to be readily available to patients for reference.

PROCEDURE:
A. Distribution of Notice of Privacy Practices

1. The Notice will be available for distribution at all points of registration or the place of service at HQ entities and will be displayed in main areas.

2. The Notice will be prominently posted on the System facility web site and be available electronically. All documentation related to the Notice is to be maintained in the medical record for a minimum of six (6) years.

3. The Notice will be available in both English and Spanish and is made available upon request.

4. HQ entities will provide the Notice once to each patient (or the patient’s Personal Representative) on the date of the first service delivery. Note: A date cannot be entered into the system until the patient actually receives the Notice; therefore, if a patient is pre-registered, or has a paper registration where the patient is not present, a date should not be entered into the system.

   a. For each patient encounter at a hospital, the registration information system will be checked to determine if the Notice was previously given and if a signed acknowledgment was received.

   b. For each new patient visit at a Health Quest Medical Practice (“HQMP”) location, a Notice will be provided, and an acknowledgement obtained.

   c. If there is no record that the Notice was previously provided to the patient or the patient’s Personal Representative, a Notice will be provided, and the patient will be asked to sign the acknowledgment of receipt. If the patient indicates that the
Notice was previously received, and an acknowledgement form signed, document this as the patient’s reason for not signing another; if he/she refuses to provide an acknowledgment for any other reason, document in the acknowledgement section of the Notice that efforts were made to obtain the acknowledgment and the reason(s) why the acknowledgment was declined.

d. The original paper acknowledgement form, indicating the patient’s or Personal Representative’s signature or refusal to sign or an electronic scanned version of this document must be stored in an easily retrievable location for at least six (6) years.

e. If the patient requests the Notice via email, ensure that the correct email address is utilized, and if a failed transmission notification is received, a paper copy of the Notice must be provided.

B. Acknowledgement of Receipt
A good faith effort to obtain acknowledgement of receipt from the patient must be evidenced. If an acknowledgement cannot be obtained e.g., the patient refuses to sign it, efforts to obtain the acknowledgement must be documented. In an emergency treatment situation, it is not necessary to make a good faith effort, however, it must be documented that the acknowledgement was not received due to an emergency treatment situation.

C. Questions About the Notice
If the patient has additional questions, direct the patient to the HQ Office of Compliance, Internal Audit and Privacy (“OCIAP”) at (845) 475-9755.

D. Review and Changes to the Notice

1. The Notice will be reviewed periodically to ensure continued compliance with the privacy regulations, as amended from time-to-time, and/or privacy policies and procedures by the OCIAP.

2. If the Notice is revised, the revised Notice must be posted in prominent locations at the HQ facility or HQMP location and on the HQ web site and provided to any patient upon request. When the Notice is revised, HQ will make the revised Notice available upon request on or after the effective date of a revision. HQ will promptly revise the Notice whenever a material change to HQ policies and procedures is made that affects the Notice.

DEFINITIONS:
See HIPAA Glossary
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<td>Chief Compliance Officer</td>
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REFERENCES:
45 CFR 164.520
5.2.10 Notice of Privacy Practice Policy

POLICY HISTORY:
Supersedes: 2/13/2019
Original Implementation Date: 2/27/2014
Date Reviewed: 2/28/2020
Date Revised: 2/27/2014, 2/13/2019, 2/28/2020

APPROVAL:

[Signature]

Procedure Owner 2/28/20

Date