PURPOSE:
To ensure compliance with the HIPAA Privacy Rule, that allows a personal representative authorized to act on behalf of a patient, to make decisions related to the use and disclosure of the patient’s individually identifiable health information (“PHI”).

POLICY:
It is the policy of Health Quest Systems, Inc. and its affiliates (“HQ”), when appropriate, to recognize personal representatives for patients of HQ for purposes of sharing PHI with them and allowing them to act on behalf of patients in certain circumstances. Subject to certain exceptions, the HIPAA Privacy Rule (the “Rule”) requires HQ to treat an individual’s personal representative as the individual with respect to uses and disclosures of the individual’s protected health information, as well as the individual’s rights under the Rule, depending on the personal representative’s authority to make health care decisions for the individual. State or other law should be consulted to determine the authority of the personal representative to receive or access the individual’s protected health information.

DEFINITIONS: See HIPAA Glossary

ENFORCEMENT:
All individuals whose responsibilities are affected by this policy are expected to be familiar with the basic procedures and responsibilities created by this policy. Failure to comply with this policy will be subject to appropriate remedial and/or disciplinary action, up to and including termination of any employment or other relationship, in accordance with this policy.

REFERENCES:
45 CFR, Parts 160 and 164
Sections 18(2) and 2982(3) of the New York Public Health Law
2011 Connecticut Code, Sec. 19a-575a
5.2.25 Personal Representatives and Communication with Patient Families Procedure

POLICY HISTORY:
Supersedes: 2/27/14
Original Implementation Date: 2/27/14
<table>
<thead>
<tr>
<th>Title: Personal Representatives and Communication with Patient Families</th>
<th>Reference Number: HQ 5.2.25</th>
</tr>
</thead>
<tbody>
<tr>
<td>Signature: Chief Compliance Officer</td>
<td>Page #: Page 2 of 2</td>
</tr>
</tbody>
</table>

Date Reviewed: 3/13/19, 3/24/20  
Date Revised: 2/27/14, 3/13/19, 3/24/20

**APPROVAL:**  
W.A. McNulty by [Signature]  3.31.20

Policy Owner  Date