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USE OF PROTECTED HEALTH INFORMATION FOR TREATMENT, PAYMENT AND OPERATIONS POLICY

Policy Number:	CP-013	Created:	August 2019
Department:	Compliance	Last Reviewed:	August 2019
Responsible Party:	Compliance Manager	Last Revised:	August 2019
Approval Authority:	Compliance Committee	Next Review Date:	August 2020

Purpose

The purpose of this Policy and Procedure is to help individuals who have access to Protected Health Information (PHI) understand how to appropriately use PHI within the course of their work.

Scope

This Policy applies to all Amplifon entities that provide services in the United States. Any individual that is acting on behalf of Amplifon in the course of their daily work is expected to abide by this policy. This includes Employees, Contractors, Volunteers, Board Members, Vendors and First Tier, Downstream and Related entities.

Key Terms

Amplifon: Amplifon (USA), Inc., and its subsidiaries.

Treatment is the provision, coordination, or management of health care and related services for an individual by one or more health care providers, including consultation between providers regarding a patient and referral of a patient by one provider to another.

Payment encompasses activities of a health plan to obtain premiums, determine or fulfill responsibilities for coverage and provision of benefits, and furnish or obtain reimbursement for health care delivered to an individual[21] and activities of a health care provider to obtain payment or be reimbursed for the provision of health care to an individual.

Health care operations are any of the following activities:

(a) quality assessment and improvement activities, including case management and care coordination;
(b) competency assurance activities, including provider or health plan performance evaluation, credentialing, and accreditation;
(c) conducting or arranging for medical reviews, audits, or legal services, including fraud and abuse detection and compliance programs;
(d) specified insurance functions, such as underwriting, risk rating, and reinsuring risk;
(e) business planning, development, management, and administration; and
(f) business management and general administrative activities of the entity, including but not limited to de-identifying protected health information, creating a limited data set, and certain fundraising for the benefit of the covered entity.

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Policy

Any individual or organization that has access to Amplifon patient data may use and disclose protected health information for purposes of treatment, payment, and health care operations activities without explicit patient consent.

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Procedure(s)

1. The following uses of Protected Health Information (PHI) are appropriate and permitted under the Privacy Standard.

a. **For Treatment:** Amplifon may use its patients PHI to provide treatment or services. PHI about patients may be disclosed to providers who are involved in the care of each patient.

b. **For Payment:** Amplifon may use and disclose medical information about a patients' treatment and services to bill and collect payment from patients, their insurance company or a third-party payer. Amplifon may also tell patients' health plan about treatment or services they are going to receive in order to determine whether their insurance plan will cover the treatment or services.

c. **For Health Care Operations:** Amplifon may use information in patients' health records for health care operations, as defined by 45 CFR §164.501 and this policy. For example, Amplifon may use this information to assess the care and outcomes in their case and others like it. The results may then be used to continually improve the quality of care for Amplifon patients. Amplifon may disclose information to providers for educational purposes.

2. Other acceptable uses of PHI include disclosures (but are not limited to):

a. To business associates with a current Business Associate Agreement;
b. To remind patients that they have an appointment for medical care;
c. To assess patient satisfaction with our services;
d. To tell patients about possible treatment alternatives;
e. To tell patients about health–related benefits or services;
f. For conducting training programs or reviewing competence of health care professionals.

3. Workforce members must always use only the minimum information necessary to accomplish the intended purpose of the use, access, or disclosure, unless the disclosure is related to treatment.

4. Patient privacy will be supported through authorization, access and audit controls and should be implemented for all systems that contain identifying patient information. Within the permitted access, an individual system user must access only what they need to perform his or her job.

5. Each workforce member with treatment, payment or health care related responsibilities is responsible for compliance with these policies and principles.

6. The Chief Compliance and Privacy Officer has the responsibility of facilitating compliance with these procedures.

Exceptions

Any exceptions to this Policy will be considered and approved on a case-by-case basis by the Approval Authority.

Related Policy and Compliance Documents

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References

45 CFR §164.506

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