

NOTICE OF PRIVACY PRACTICES

THIS NOTICE OF PRIVACY PRACTICES DESCRIBES HOW INFORMATION ABOUT YOU MAY BE USED AND DISCLOSED AND HOW YOU CAN ACCESS THIS INFORMATION. PLEASE REVIEW CAREFULLY.

Jetstream APS discloses personal identifying information we receive from our clients for the purpose of retrieving medical records (protected health information) from medical facilities or their designated third party copy services. Jetstream APS then discloses the protected health information pursuant to appropriate written authorizations to gather information for, and disclose it to, its clients for the purposes of their underwriting and servicing of insurance policies, and for their other legitimate purposes authorized by law.

We are required by the federal Health Insurance Portability and Accountability Act (HIPAA) Privacy Rule to give you this Notice about our privacy practices, our legal duties, and your rights concerning your PHI. **This Notice of Privacy Practices takes effect immediately and will remain in effect until we replace or modify it.**

The Information We Collect

The types of personal identifying information we collect include: patient name, address, phone number, email address, date of birth, social security number, and insurance policy number.

We also collect protected health information (PHI) such as: medical conditions, prognosis, diagnosis, treatment, prescriptions, drug or medical history, treatment received, drug history, drug interactions, medical test data, lab results, or any other type of medical information.

HIPAA Compliance

Jetstream APS takes security and compliance very seriously and has built a secure HIPAA compliant website.

Jetstream APS is fully compliant with the standards and procedures outlined in the HIPAA rules and regulations. We have protections and security measures in place to protect from loss, misuse, and alteration of the information provided to us.

The privacy standards of HIPAA provide a framework for health privacy protection which serves to enhance and insure the protection of patient medical and health information. The Privacy Rule applies only to health plans, health care clearinghouses, and covered certain health care providers – known as “covered entities” under the legislation. Most health care providers rely on contractors and other “business associates” to assist them in providing quality care to their patients. Jetstream APS is considered a business associate.

A business associate is typically defined as, “a person or entity that provides certain functions, activities or services for or to a covered entity, involving the use and/or disclosure of

protected health information.” The business associate rule places restrictions on third parties who perform certain covered functions on behalf of a covered entity and receive protected health information.

The privacy law requires covered entities to have written agreements and satisfactory assurances that the information they disclose to their business associates will: remain confidential, only be used for the stated purpose, be safeguarded from misuses, and assist the covered entity in complying with their responsibilities under the law. Information is only provided to a business associate to help the covered entity carry out their health care function – never for independent use by the business associate.

Valid Authorizations

Our clients must provide a valid written authorization from the patient in order for Jetstream APS to obtain medical records from medical facilities on their behalf. We submit the written authorization along with a written request and letter of representation to the medical facility. We keep a copy of the written authorization for 6 years.

An authorization to disclose PHI shall be communicated in plain language and contain the following core elements:

1. A meaningful and specific description of the information to be used or disclosed.
2. The name or other specific identification of the person(s) or class of persons authorized to make the requested use or disclosure (medical facility).
3. The name or other specific identification of the person(s) or class of persons to whom the covered entity may make the requested use or disclosure (the requestor). The requestor should be Jetstream APS or a life insurance carrier, general brokerage agency or agent for whom Jetstream APS is authorized to obtain records on their behalf.
4. A description of each purpose of the requested use or disclosure. The statement "at the request of the individual" is a sufficient description of the purpose when an individual initiates the authorization and does not or elects not to provide a statement of the purpose.
5. An expiration date or an expiration event that relates to the individual or the purpose of the use or disclosure. The statements "end of the research study," "none," and similar language are sufficient if the authorization is for a use or disclosure of PHI for research—including for the creation and maintenance of a research database or research repository.
6. Signature of the individual and date. If the authorization is signed by a personal representative of the individual, a description of such representative's authority to act for the individual must also be provided.

An authorization to disclose PHI shall also include the following statements:

1. Revoke statement: A statement that the individual may revoke the authorization in writing, and instructions on how to exercise such right (who does the individual need to write, name and address).

2. TPO/Conditioning Statement: A statement that treatment, payment, enrollment, or eligibility for benefits may not be conditioned on obtaining the authorization if such conditioning is prohibited by the Privacy Rule or, if conditioning is permitted, a statement about the consequences of refusing to sign the authorization.
3. Re-disclosure statement: A statement about the potential for the PHI to be re-disclosed by the recipient and no longer protected by the Privacy Rule.

An authorization is not valid unless it contains both the required core elements, and all of the required statements. This is the minimum information needed to ensure individuals are fully informed of their rights with respect to an authorization and to understand the consequences of authorizing the disclosure. The required statements must be written in a manner that is adequate to place the individual on notice of the substance of the statements.

Privacy Practices

This Notice of Privacy Practices describes our privacy practices, which include how we may use, disclose, collect, handle, and protect our clients' PHI. We protect our clients' privacy by taking the following precautions:

1. Limiting who may see PHI. Only Jetstream APS staff members who are authorized and trained are given access to the private information. Staff members who fail to follow the established policies and procedures are subject to disciplinary actions.
2. Limiting how we may use or disclose PHI.
3. Maintaining physical, technical, and administrative safeguards to ensure the privacy of our clients' information.
4. Developing and maintaining security policies and controls to ensure proper handling of confidential information, protecting information from unauthorized access and inappropriate disclosure.
5. Informing our clients of our legal duties with respect to PHI.
6. Explaining our privacy policies.
7. Adhering to the policies currently in effect.

Copies of this Notice

1. You may request a copy of our Notice of Privacy Practices at any time. It is your right.
2. The Notice shall also be made available on our website.
3. If you want more information about our privacy practices, or have questions or concerns, please contact us using the contact information on our website.

Changes to this Notice

The terms of our Notice of Privacy Practices apply to all records created or retained by us that contain your PHI. We reserve the right to revise or amend the terms of this Notice. We are required by law to comply with whatever privacy notice is currently in effect.

Potential Impact of State Law

The HIPAA Privacy Rule generally does not pre-empt (or take precedence over) state privacy or other applicable laws that provide individuals greater privacy protections. As a result, to the extent state law applies, the privacy laws of a particular state or other federal laws rather than the HIPAA Privacy Rule might impose a privacy standard under which we will be required to operate. For example, where such laws have been enacted, we will follow the more stringent state privacy laws that relate to uses and disclosures of PHI concerning HIV, AIDS, mental health, substance abuse, chemical dependency, genetic testing, and reproductive rights.

Rights You Can Exercise with Regard to Your PHI

If you believe your privacy rights have been violated, or if you are dissatisfied with our privacy practices or procedures, you may file a complaint with Jetstream APS's Privacy Office and/or with the U.S. Secretary of the Department of Health and Human Services. Jetstream APS assures you that filing a complaint will not in any way impact the services we provide, nor will there be any retaliatory acts against you.

If you feel the need to interact with us on any issues related to this Notice or to file a privacy complaint with us, you may contact us as follows:

Email: info@jetstreamaps.com

Phone: 310-826-3759 ext 225