

**CALIFORNIA DENTAL NETWORK
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.**

Effective April 14, 2004

The Health Insurance Portability and Accountability Act of 1996 ("HIPAA") requires that we provide you with this notice of our privacy practices and legal duties, as well as your rights, regarding any of your protected health information (PHI) that we maintain. California Dental Network (CDN) will follow the privacy practices that are described in this notice, and will also comply with any stricter federal or state laws that may apply. CDN reserves the right to change our privacy policies and to amend this notice from time to time. Updated copies of our Privacy Notice may be obtained from our website at www.caldental.net.

Use and Disclosure of your Protected Health Information (PHI)

- ◆ The following is a summary of when CDN may, as permitted by law, use or disclose your PHI without your authorization:
- ◆ For Payment Purposes- activities to make payments to and/or collect payments (including premiums) from you or third parties and to determine or maintain coverage, including providing information about your coverage or treatment to other health care entities to coordinate payment of benefits, as well as activities related to pre-authorization for certain dental services.
- ◆ For Treatment Purposes- such as forwarding copies of records submitted to CDN by your general dentist to specialists or other general dentists who will be providing care and /or second opinions about care.
- ◆ For Health Care Administration Purposes- activities essential to CDN's function as a licensed Health Care Service Plan, including, but not limited to: quality assessment and improvement activities, accreditation, certification, licensing, or credentialing activities, healthcare provider qualification and competence review, customer service activities such as answering enrollee inquiries and resolving grievances, activities designed to improve health care, and /or reduce health care costs, and underwriting and premium rating activities.
- ◆ To Provide Information on Health-Related Benefits and Alternatives, Programs or Products- CDN may provide you with information on health-related products or services, or recommend treatment options or alternatives that may be of interest to you.
- ◆ Business Associates- where services are provided to CDN through contracts with third- party Business Associates (example: independent insurance brokers), and these services involve the use or disclosure of PHI, CDN will have a written contract or contract addendum that requires the Business Associate to maintain the same privacy standards as those maintained by CDN and its employees.
- ◆ To Parents or Guardians of a Minor, Court-Appointed Guardian of an Adult, Spouse or other close relative, or personal representative -CDN may disclose health information relevant to that person's involvement in your health care or payment. CDN employees will use their best judgement to verify the identity and relationship of the persons in question, and the appropriateness of disclosing the information.
- ◆ To an Employer- for purposes of administering benefits if your benefit program is sponsored by your employer, or if health care services were provided with specific prior written request and expense of the employer, and are relevant in a grievance, arbitration or lawsuit, or describe health limitations that permit you to leave from work or that limit job related activities.
- ◆ Other Purposes- Public health activities, health oversight by government agencies, Worker's Compensation purposes, to assist in disaster relief efforts, to avert a serious threat to health or

safety, concerning victims of abuse, neglect, or domestic violence, information about decedents to coroners, medical examiners, and funeral directors, for research purposes (provided research has been approved by an institutional review board and insures privacy of your PHI), for organ donation purposes, for FDA reporting relative to adverse effects or product recalls, for underwriting and fundraising (subject to certain restrictions), for military and veterans as required by military command, for national security activities as authorized by law, for inmates (to the correctional institution or law enforcement agency in custody), for judicial and administrative purpose (including the defense by CDN of a legal action or proceeding brought by you), in response to a court order, subpoena, or law enforcement search warrant, for use in creating summary information that can no longer be traced to you, and as otherwise required by federal, state, or local law.

Authorized Disclosures

CDN will not disclose your personal health information without your prior written authorization, if such disclosure is not permitted by law. If you give us authorization to use your PHI, you may revoke that authorization in writing at any time. A revocation of authorization will only affect uses and disclosures made after the revocation is received.

Your Rights Regarding Your Health Information

- ◆ Right to inspect and copy- Subject to certain limitations you have the right to inspect and copy PHI that CDN possesses. The request must be made in writing, and CDN may charge a reasonable fee for locating and copying the information. CDN will act on your request within 30 days of receipt.
- ◆ Right to request a restriction- you may ask that CDN limit how your PHI is used and disclosed. CDN is not required to agree to your request, but if we do the limitations will be put in writing and CDN will abide by them except in emergency situations. You may not limit uses and disclosures that are required by law.
- ◆ Right to amend your PHI-If you believe that health records that CDN created about you are inaccurate or incomplete you may file a written request for amendment. If CDN did not create the information we will refer you to the source, such as your dental provider. In certain circumstances CDN may deny a request to amend. If your request is denied you have the right to file a statement of disagreement with us, and CDN has a right to file a rebuttal (and provide you with a copy of it).
- ◆ Right to confidential or alternative communications-You may request in writing that CDN communicate with you by reasonable alternative means or at an alternative address, if communications about your PHI to your home address could endanger you.
- ◆ Right to an accounting-You have the right to receive an accounting of CDN's disclosures of your PHI except for disclosures made for treatment, payment, or health care operations, or when such accounting is restricted by law. The request must be made in writing, include the time period requested, must be for a time period starting no earlier than April 14, 2004, and may not go back more than 6 years.
- ◆ Right to a paper copy of this notice- You have a right to request a paper copy of this notice at any time, even if you have previously gotten this notice electronically (by e-mail or from our website at www.caldental.net).

Complaints

If you feel your privacy rights have been violated you may file a written complaint with CDN at:

California Dental Network
Attn: Privacy Officer
23291 Mill Creek Drive, Ste. 100
Laguna Hills, CA 92653

You may also file a complaint with the Secretary of the Department of Health and Human Services. You will not be retaliated against for filing a complaint.