

## HEALTH INFORMATION PRIVACY POLICIES & PROCEDURES

- d) **Restriction on Use or Disclosure** — Patients have the right to request our dental office to restrict use or disclosure of their PHI, including for treatment, payment, or healthcare operations. We have no obligation to agree to the request, but if we do, we will comply with our agreement (except in an appropriate dental/medical emergency).

We may terminate an agreement restricting use or disclosure of PHI by a written notice of termination to the patient. We will contact our **Business Associates** whenever we agree to such a restriction to inform the **Business Associate** of the restriction and its obligations to abide by the restriction. We will document in the patient's chart any such agreed to restrictions.

- e) **Alternative Communications** — Patients have the right to request us to use alternative means or alternative locations when communicating PHI to them. Our dental office will accommodate a patient's request for such alternative communications if the request is reasonable and in writing.

Our dental office will inform the patient of our decision to accommodate or deny such a request. If we agree to such a request, we will inform our **Business Associates** of the agreement and provide them with the information necessary to comply with the agreement.

- f) **Applicability** — Our dental office will be aware of and respect these patients' rights regarding their PHI, even though in most situations patients are unlikely to exercise them.

### 11. Staff Training and Management, Complaint Procedures, Data Safeguards, Administrative Practices

#### a) Staff Training and Management

- **Training** — Our dental office will train all members of our workforce in these Privacy Policies & Procedures, as necessary and appropriate for them to carry out their functions. We will complete the privacy training of our existing workforce by April 14, 2003.

After April 14, 2003, our dental office will train each new staff member within a reasonable time after the member starts. We will also retrain each staff member whose functions are affected either by a material change in our Privacy Policies and Procedures or in the member's job functions, within a reasonable time after the change.

Form 7, **Staff Review of Policies and Procedures**, can be used to have workforce members acknowledge they have received and read a copy of these Policies and Procedures.