

People Resources, Inc.
Revised Notice of Privacy Practices for the
Member Assistance Program (MAP) &
Employee Assistance Program (EAP)
Effective Date: February 1, 2010

This Notice describes how confidential information about you may be used and disclosed and how you can get access to this information. Please review it carefully.

People Resources, Inc. is dedicated to protecting all confidential information we collect and use in providing MAP & EAP Services. We follow all requirements of Health Insurance Portability and Accountability Act of 1996 (HIPAA) and Federal Confidentiality Law 42 CFR, Part 2; and the Health Information Technology for Economic and Clinical Health (HITECH) Act, passed as part of the 2009 American Recovery and Reinvestment Act. *If you have questions, want to exercise your privacy rights or make a complaint; contact our **Privacy Officer** at People Resources, Inc., 9666 Olive Blvd, Suite 705, St. Louis, MO 63132; 314-222-4012 or 800-765-9124.*

I. How People Resources May Use or Disclose Your Confidential Information

People Resources collects personal and health information from you and we store it in our confidential databases and sometimes in paper records. People Resources uses and discloses your confidential information for the following purposes:

1. **MAP & EAP Services.** We assist members in finding resources, meeting needs and solving problems at home, school and at work. Our services include *web-based* information and referral services; *telephone-based* services such as confidential conversation with a Service Specialist,* individualized telephone coaching, and referrals for health care or community services; brief, *in-person counseling* services; and evaluation and services provided if you are formally referred as a condition of continued employment, often called *supervisor referrals*. These services are free to you. We also provide to your company or union fund critical incident stress management services for employees and managers when there has been a traumatic event at the worksite; and training on accessing our services and improving personal potential, such as stress management training.

In order to provide, pay for and manage these services, we collect personal information such as names, addresses, social security numbers and information you give us concerning issues and needs for which you would like our help. For example, if you would like to have brief counseling services, we will give your Service Specialist enough of your confidential information so the services can be provided. Another example is our quality review of some of our client records in order to see that services are properly provided. In all situations, we maintain our highest standards for protecting confidentiality.

Your employer or union fund does NOT receive any confidential information about the services you seek or use, with one exception. If you are formally referred for brief counseling services, called a *supervisor referral*, then we will tell the referring official whether you called us, dates and times of appointments, whether you attended scheduled appointments, and if you are following the action plan established by your Service Specialist. We may also inform of any specific worksite risks, such as risk of violence or serious accident risks. In some cases we may share anticipated time off work and any recommended follow-up drug tests.

* A Service Specialist is a licensed counselor or certified Employee Assistance Professional who has been specially trained to provide MAP & EAP services. The Specialist may be a staff member or network affiliate.

2. Other Possible Disclosures

Notification and communication with family. We may disclose your confidential information to a family member, your personal representative or another person legally responsible for your care *only with your express permission*. In an emergency when there is serious threat of harm to you or others, we may communicate with your family or others to ensure the safety of all involved. We follow State law in sharing information with parents of children receiving our services.

Required by law or regulation. As required by law or regulation, we may disclose your confidential information. Examples include possible child abuse or domestic violence, or a serious possibility that you or others could be hurt or hurt someone else. We may also be required to disclose your private information to government health agencies for audits, investigations, inspections, licensure and other proceedings; to law enforcement officials for official business; to comply with a court order or subpoena; to prevent or lessen a serious threat to the health or safety of an individual or the general public; to comply with workers' compensation laws; for military, national security, prisoner or government benefits purposes; and/or to provide appointment reminders or give you information about our other services available to you.

Except as detailed above, no other information is shared without your written permission, which must include your name, information to be disclosed and to whom, and time limit for sharing the information. You may revoke your authorization in writing at any time.

II. Your Confidential Personal and Health Information Rights

You have the right to:

- Inspect and copy your personal and health information, with the exception of a Service Specialist's personal psychotherapy notes. *We require your written request in advance and proof of your identity before we share the information.* You have the right to receive your health information through reasonable alternative means or at an alternative location. You have the right to request either a hard copy or an electronic copy of your records.
- Request that we make changes to your confidential information. We will review your request and may or may not make the change. If we deny your request, we will provide you with information about our denial and how you can disagree with our denial.
- Receive a list of any disclosures we have made of your personal information, except that we do not have to account for the disclosures needed for treatment, payment, operations or for military, national security, prisoner or government benefits purposes.
- Request restrictions on certain uses and disclosures of your personal and health information. People Resources is not required to agree to the restriction that you request. However, we must comply with your request to restrict a disclosure of your confidential information for payment or health care operations if you paid for these services in full, out of pocket.
- Receive a paper copy of this Notice. We may ask you to sign your receipt of the copy.

III. Changes to this Notice & Making Complaints

People Resources reserves the right to amend or change this Notice at any time and to make any changes effective for all information that we maintain, including information already created or received. Until any changes are made, we are required by law to comply with this Notice. If we revise our Notice, we will put it on our web-site, WorkLifeTools.com, and provide written copies to our callers receiving services.

Complaints about this Notice or our handling of your confidential information can be directed to our Privacy Officer. If you are not satisfied with the manner in which we handle a complaint, you may submit a formal complaint to the Department of Health and Human Services, Office of Civil Rights.