



**Policy: Notice of Privacy Practices**

**Effective date: April 1, 2024**

**Reviewed Date:**

**Introduction:** Specialty 1 Partners is committed to operating in accordance with the highest ethical and professional standards and in full compliance with all applicable federal, state and local regulations, including but not limited to the Health Insurance Portability and Accountability Act (HIPAA). This Policy outlines the Specialty1 Partners obligation to provide patients with adequate notice of its Privacy Practices.

**Purpose:** This policy and procedure describe the processes by which Specialty1 provides notice of its privacy practices to patients of supported practices.

**Scope:** This policy applies to all Specialty1 Partners companies, including Endo1 Partners, LLC, Endo1 Partners-California LLC, OS1 Partners, LLC and Perio1, LLC and their respective affiliates and subsidiaries, partner practices, including practices to which Specialty1 Partners and/or its affiliates or subsidiaries provide management and/or administrative services, collectively referred to as Specialty1 in this policy (together, "Specialty1" or the "Company"). This policy further applies to any consultants, contractors or vendors providing services and/or otherwise engaged by the Company.

**Policy:** All partner practices of Specialty1 Partners will provide individuals with adequate notice of how their Protected Health Information is used and/or disclosed, including their rights and the practices' obligations with respect to that information as outlined below.

**Definitions:**

**Protected Health Information:** Any information in the clinical record or designated records set that can be used to identify an individual that was created, used, or disclosed while providing health care services. It includes information in any form, whether electronic, paper or oral that relates to:

- Individual's past, present, or future physical or mental health or condition,
- The provision of health care to the individual, or
- The past, present, or future payment for the provision of health care to the individual.

**Procedure:**

**A. Availability of the Notice of Privacy Practices: Specialty1 Partners will make the Notice of Privacy Practices (NPP) available as follows:**

- a. Hard or electronic copies must be made available to any person who asks for it (individuals asking for a hard copy must be provided with a version they can keep).
- b. The NPP must be prominently posted on practice websites and in clear and prominent location(s) of the practice, such as the lobby or reception area.
- c. The NPP will be provided to each individual patient or patient's representative no later than the date of first service delivery and, except in emergency treatment situations, make a good faith effort to obtain the individual's (or individual's representative) written acknowledgement of receipt of the notice. Such written acknowledgement will be retained in the patient's clinical record.
  - i. In emergency situations, the NPP must be provided as soon as reasonably practicable after the emergency has ended.
  - ii. When the first service delivery to an individual is provided over the internet, through email or other electronic means, an electronic NPP must be sent automatically and contemporaneously in response to the individual's first request for service. In these circumstances, good faith efforts will be made to obtain a return receipt or other transmission from the individual.
  - iii. If an acknowledgement cannot be obtained, efforts to obtain the acknowledgement and reasons why it could not be obtained will be documented.

**B. Contents of the Notice of Privacy Practices: Notice of Privacy Practices used by Specialty1 Partners will be approved in advance by the Specialty1 Partners Privacy Officer and Security Officer (See attachment A for template NPP). At a minimum the NPP will contain the following:**

- a. How the office uses and discloses Protected Health Information about an individual.
- b. The individual's rights with respect to the information and how the individual may exercise these rights, including how the individual may file a complaint.
- c. Specialty1 Partners legal duties with respect to the information, including a statement that the covered entity is required by law to maintain the privacy of Protected Health Information.
- d. Whom individuals can contact for further information about the practice's privacy policies.

**C. Reporting Violations of this policy:**

- a. Please report any perceived or potential violations of this policy to the Company's Integrity & Compliance department or General Counsel office using [compliance@specialty1partners.com](mailto:compliance@specialty1partners.com). You can also use the Company's **anonymous hotline (844-722-1800)** as a resource to the extent you wish to remain anonymous in reporting any violation.

**Policy owners:** Specialty1 Integrity and Compliance; Specialty1 Information Security, Specialty1 General Counsel's office

**Policy approved by:** Specialty1 Integrity & Compliance Committee