

## **PRIVACY NOTICE FOR THE HEALTHY START DATA COLLECTION SYSTEM INTER-TRIBAL COUNCIL OF MICHIGAN**

THIS NOTICE DESCRIBES HOW PROTECTED INFORMATION AND PERSONALLY IDENTIFIABLE INFORMATION MAY BE USED AND DISCLOSED AND HOW INFORMATION CAN BE ACCESSED. PLEASE REVIEW IT CAREFULLY. (“We” as used throughout this document shall refer to the Inter-Tribal Council of Michigan)

This Privacy Notice is provided to you as a requirement of the Health Insurance Portability and Accountability Act (HIPAA). It describes how we may use or disclose your protected health information, with whom that information may be shared, and the safeguards we have in place to protect it. This notice also describes your rights to access and amend your protected health information. You have the right to approve or refuse the release of specific information outside of our system except when the release is required or authorized by law or regulation.

### **PROTECTED INFORMATION:**

The **Inter-Tribal Council of Michigan’s (ITCMI) Healthy Start Data Collection System** collects and protects sensitive information to help improve services for families across Tribal Partners we serve within Inter-Tribal Council of Michigan’s home visiting network. We are committed to respecting privacy and safeguarding Personally Identifiable Information (PII) and Protected Health Information (PHI). PII consists of any information that can be used to identify, contact, or locate a patient. PHI is any information that identifies you and relates to your health condition, the health care services you have received, or payment for those services. We protect your privacy by limiting who can see your PHI to the people who actually need it. We will not use or disclose your PHI, except as described in this notice, unless we receive your permission, or the law otherwise permits or requires us to do so.

### **HOW WE MAY USE AND DISCLOSE INFORMATION:**

- To operate, manage, and improve the services and functions of the Healthy Start Data Collection System. This includes data collection, reporting, audits, and compliance monitoring.
- To run our business operations, improve and evaluate your care and how we are providing services to you.

- To coordinate services related to home visiting such as health, education, housing, and social support.
- To meet reporting requirements for funding and program evaluation.
- To help improve services for families within Tribal communities.
- To communicate about appointments and available programs and information about services within Tribal communities.
- To provide health information to a family or friend legally authorized to have such information as part of your medical care, services, or treatment such as an authorized legal guardian or other legally authorized representative.
- To provide information to a health oversight agency for activities authorized by law such as audits, inspections, or investigations, etc.
- For public health and safety issues such as to prevent, control, or notify of disease, injury, or disability; to report child abuse or neglect; to notify of recalls; or to report problems with medications or other products.
- To avert serious threat to your health or safety or the health and safety of the public or another person.
- To provide information to third parties referred to as “business associates” that provide products and services on our behalf. If we disclose your information to these entities, we will enter into an agreement with them to safeguard your information.
- We may use or disclose your health information to the extent the use or disclosure is required by law, to be used for law enforcement purposes, or in response to an order of a court or administrative tribunal. Any such use or disclosure will be made in compliance with the law and limited to what is required by the law.
- For and under any other circumstances as authorized and allowed by applicable law but limiting any such disclosure to the extent possible under the law.

#### **HOW WE PROTECT YOUR INFORMATION:**

- We are required by law to maintain the privacy and security of your health information and ITCMI follows strict privacy policies and security measures to protect client data and follows the terms of this policy notice currently in effect.
- All users of the ITCMI data system are required to sign a data system use policy agreement.
- We share information only with authorized staff, sub-contracted partners, and grant funders involved in program services thereby limiting who can see your PII and PHI.
- All uses of local tribes are required to abide by internal Tribal/agency policies regarding access to and use of PII, PHI, and other sensitive or confidential data records.

- We will let you know promptly if a breach occurs that may have compromised the privacy and security of your health information.
- If a federal, state, or other applicable law requires us to restrict the disclosure of your information beyond what is provided in this Notice, we will follow and abide by the applicable provisions of those laws.

### **YOUR RIGHTS REGARDING YOUR INFORMATION:**

- You can request access to review or obtain copies of your records maintained in the Healthy Start Data Collection System.
- You can request corrections to your information if you believe it is inaccurate or incomplete.
- You can request restrictions on certain uses or disclosures (although we may not always be able to accommodate such requests).
- You can request how and where we contact you.
- You have the right to know how your information is shared.
- You can request a list of those with whom your information has been shared.
- You can request copies of any privacy policies applicable to your care.
- Any rights or restrictions with regard to your PII and PHI will be handled in accordance with applicable laws.

### **QUESTIONS OR CONCERNS?**

If you believe your privacy rights have been violated or have questions about this notice or your rights, you may contact our Clayton Kincheloe, Executive Director at:

**Inter-Tribal Council of Michigan**  
**2956 Ashmun Street, Sault Ste. Marie, MI 49783**  
**Phone: (906) 632-6896**  
[www.itcmi.org](http://www.itcmi.org)

You also have the right to file a complaint with the appropriate Tribal authority or governing body. You will not be penalized or retaliated against for filing a complaint.

The Inter-Tribal Council of Michigan reserves the right to amend this notice at any time. Revised notices will be made available through our website and by request.