

## Philadelphia Fire Department



### Notice of Privacy Practices (NPP)

This mission of the City of Philadelphia Fire Department Division of Emergency Medical Services ("EMS") is to protect the public by providing efficient and effective emergency medical services. We are required by law to maintain the privacy of your protected health information ("PHI"). This notice describes how we may use or disclose your PHI, what your rights are, and what our responsibilities are.

In this document "City" means the Fire Department – Emergency Medical Services only. The term "protected health information" or "PHI" in this Notice includes any information we maintain that reasonably can be used to identify you and that relates to your physical or mental health condition, the provision of health care to you, or the payment for such health care.

#### **Reasons That Your Protected Health Information May be Used and/or Disclosed**

- **For Treatment.** The City is allowed to use and disclose your PHI in order to treat you. For example, EMS staff may discuss your case with hospital staff.
- **For Payment.** The City is allowed to use and disclose your PHI in order to get payment for your treatment. For example, the City may disclose the type of treatment provided to you in order to get payment from an insurance company. Your information may also be shared with other government programs such as Medicaid and Medicare to coordinate benefits.
- **For Healthcare Operations.** The City is allowed to use and disclose your PHI in order to continue its healthcare operations. For example, your information may be used or disclosed to a social worker for case management purposes and care coordination with other providers of service who may be involved in your case. Your information may be used for Quality Control purposes and in response to complaints.
- **Business Associates.** There are some services provided by the City through contracts with businesses. For example, these can be billing vendors for services provided by the City. We require business associates to protect your PHI too.
- **Research.** Anyone who would like to use PHI to conduct research studies must have the approval of the Institutional Review Board unless restricted by other Federal or State laws. Only after the approval may the City disclose the information.
- **The County Administrator.** The City is permitted to share your PHI with the County Administrator, who is responsible for overseeing mental health services..
- **Food and Drug Administration.** The City may disclose PHI to FDA about problems relating to medications and medical equipment so that the FDA can issue recalls, repairs, or replacements.
- **Consumer Product Safety Commission.** The City may disclose PHI to the CPSC relating to the safety of consumer products so that the CPSC can identify problems and issue recalls.
- **Worker's Compensation.** The City may disclose PHI as authorized by established laws to comply with worker compensation and other similar programs.
- **Public Health.** As required by law, the City may disclose your PHI to public health authorities whose job is to prevent or control disease, injury, or disability.
- **Correctional Institutions.** Should you be an inmate of a correctional institution, the City may share your PHI with the healthcare professionals at the institution so you can continue your health treatment.
- **Victims of Abuse.** The City may disclose the PHI of anyone we reasonably believe is a victim of abuse, neglect, or domestic violence to the appropriate authorities when authorized by law.
- **Health Oversight Activities.** The City may disclose your PHI to a health oversight agency when necessary for the oversight of the healthcare system, government benefit programs, and to determine compliance with civil rights laws.
- **Judicial and Administrative Proceedings.** The City may disclose PHI in response to a court order, subpoena, or other lawful request.
- **Law Enforcement.** In certain circumstances the City may disclose PHI to law enforcement officials.
- **Decedents.** PHI of decedents may be used and disclosed to coroners, medical examiners, and investigators if it is needed to carry out their duties.
- **Military.** The City may use or disclose your PHI to the appropriate authorities for military and veterans' activities.
- **Reports.** Federal law allows your PHI to be given to an appropriate health oversight agency, public health authority, or attorney, provided that a City employee or Business Associate believes in good faith that we have engaged in unlawful conduct or have otherwise violated professional or clinical standards and are potentially hurting individuals, workers, or the public.
- **PHI Related to Reproductive Health Care:** A request to disclose PHI related to reproductive health care for health oversight activities; judicial and administrative proceedings; law enforcement purposes; or to coroners and medical examiners must comply with a HIPAA written attestation requirement and receive City HIPAA Privacy Officer approval before the City may disclose that PHI.
- **Required by Law.** The City may use or disclose your protected health information for purposes required by law.

#### **When the situation is not an emergency and you have not objected, the City may disclose your PHI**

- to a relative or someone who you have agreed is involved in your care or healthcare payments;
- to notify or assist in notifying a family member or personal representative of your location and general condition;
- to legally authorized disaster relief agencies to coordinate with such agencies.

**Authorizations.** Other uses and disclosures of your PHI will be made only with your authorization. You have the right to change your mind at any time in writing before we have shared your information.

Authorization forms can be found on the Fire Department's website, Department of Records' website, by e-mailing [pfdemsrecords@phila.gov](mailto:pfdemsrecords@phila.gov), or by calling the Fire Department's Privacy Office normal business hours, M-F 9 a.m. to 2 p.m., or by mail.

### **Your Rights Regarding Protected Health Information**

You have the right to

- receive private communications of protected health information;
- look at and copy your protected health information;
- request an amendment to your protected health information;
- know, in certain circumstances, who has your protected health information;
- receive a paper copy of this notice upon your request to the Philadelphia Fire Department Privacy Office;
- ask that your protected health information not be shared in certain circumstances. The City is not legally required to agree to your request.

### **The City's Duties**

The City is required by Federal and/or State law to

- keep your protected health information private;
- notify you of its legal duties and privacy practices involving protected health information; and
- follow the terms of the notice currently in effect (this notice).
- The City reserves the right to make changes to this notice and to apply the changes to all protected health information that the City currently has now or in the future.

### **Questions & Complaints**

If you believe that your privacy rights have been violated, you may file a written complaint with the City by contacting the City HIPAA Privacy Officer, The Fire Department's Privacy Office, or with the U.S. Secretary of Health and Human Service. It is safe to file a complaint, no one may hold it against you.

### **Contact Information**

City of Philadelphia HIPAA Privacy Officer  
City of Philadelphia Law Department  
1515 Arch Street, 15<sup>th</sup> Floor  
Philadelphia, PA 19102  
Ph: (215)-683-5404  
[hipaaprivacy@phila.gov](mailto:hipaaprivacy@phila.gov)

Philadelphia Fire Department  
Privacy Office  
240 Spring Garden Street  
Philadelphia, PA 19123  
Ph: (215) 685-4205  
Fax: (215) 685-4208  
E-mail:  
[pfdemsrecords@phila.gov](mailto:pfdemsrecords@phila.gov)

Secretary of Health and Human Services  
Region III, Office of Civil Rights  
U.S. Department of Health and Human Services  
150 S. Independence Mall West, Suite 372  
Public Ledger Building  
Philadelphia, PA 19106-9111  
Main Line: (215) 861-4441  
Hotline: 1(800) 368-1019  
Fax: (215) 861-4431  
TDD: (215) 861-4440  
[www.hhs.gov/ocr/hipaa/](http://www.hhs.gov/ocr/hipaa/)

A copy of this notice can be found on the internet at [www.phila.gov/privacypolicy/](http://www.phila.gov/privacypolicy/) For questions about PHI outside of the Fire Department Emergency Medical Services Division, please contact the City's HIPAA Privacy Officer as indicated above.

**Effective Date:** 11/01/2024