



NOTICE OF PRIVACY PRACTICES

Effective Date: March 20, 2024

YOUR INFORMATION

YOUR RIGHTS

OUR RESPONSIBILITIES

Wyoming 211 is a statewide provider of information and referral that connects individuals in need to health and human services such as housing, food, transportation, employment and job training, insurance, financial aid, debt and tax preparation counseling, disaster relief, and other services. Wyoming 211 further serves as the backbone for CommuniCare, a Community Information Exchange (CIE)TM.

CommuniCare is a network of providers through a shared technology platform that enables a coordinated, community-oriented, person-centered approach to delivering services to individuals in need in Wyoming. When individuals consent to share their information with the network, Partner Agencies are able to share client information using a secure data platform and to provide coordination and electronic referrals for services.

We are required by law to keep your protected health information safe and private.

- We will tell you quickly if something happens that causes your information not to be safe and private.
- We must follow the duties and privacy rules outlined in this notice and give you a copy of it.
- We will not use or share your information except as stated here unless you tell us in writing that we may. If you tell us we may share your information, you may change your mind at any time. Tell us in writing if you change your mind.

Wyoming 211 and the partners of CommuniCare are committed to protecting your privacy. This notice describes how personally identifiable information about you may be used and disclosed and how you can access this information. Please review this notice carefully.

What is covered by this Notice:

This Notice of Privacy Practices applies to CommuniCare (the “Network”, “CIE”, or “we”) and our collection, use, and sharing of your Information.

What is NOT covered by this Notice:

This Notice does not cover the privacy practices of organizations other than the CommuniCare CIE, including organizations that participate in the CIE (our “Partners”) and may provide services to you. This Notice does not cover Information obtained from you by any other organization or how it is used or shared.

YOUR RIGHTS

When it comes to your personal information, you have certain rights. This section explains your rights and some of our duties to help you.

<p>Get an electronic or paper copy of your client record</p>	<ul style="list-style-type: none"> ➤ You have the right to inspect and copy your information for as long as we maintain it. ➤ We will provide a copy or a summary of your information. We can usually do this within 30 days of your request. ➤ All requests must be in writing. ➤ We may charge you a nominal fee for each page copied and postage if applicable.
<p>Ask us to correct your client record</p>	<ul style="list-style-type: none"> ➤ You can ask us to correct or amend your self-reported information you think is wrong or incomplete. ➤ If the information was reported to us by your healthcare provider, a government agency, or another third-party provider, you must contact that provider to correct or amend the information.
<p>Request confidential communications</p>	<ul style="list-style-type: none"> ➤ You can ask us to contact you in a certain way. This includes telling us which phone or email to use, or which street address. You can ask us orally or in writing. Our contact information is on Page 6. ➤ We will say “yes” to all reasonable requests. ➤ You can ask us not to leave messages when we call you to: <ul style="list-style-type: none"> ○ Remind you of an appointment. ○ Talk to you about a care plan. ➤ We will accommodate a request for confidential communications that is reasonable based on our system capabilities.
<p>Ask us to limit what we use or share</p>	<ul style="list-style-type: none"> ➤ You can ask us not to use or share information for treatment, payment, or our operations. You can also ask us not to share your health information with certain people. ➤ To request limits: <ul style="list-style-type: none"> ○ Tell us in writing. ○ Tell us exactly which information not to share. ○ Name which people we should not share your information with ➤ We are not required to say yes. And we may say “no” if it would affect your care. ➤ If we agree to the restriction, we will comply with your written request unless the information is needed to provide you with emergency treatment or we are required to disclose the information by law. ➤ We reserve the right to terminate any previously agreed-to restrictions (other than a restriction we are required to agree to by law). We will inform you of the termination of the agreed-to restriction and such termination will only be effective with respect to protected information created after we inform you of the termination.
<p>Get a list of those with whom we’ve shared information</p>	<ul style="list-style-type: none"> ➤ With some exceptions, you have the right to receive an accounting of disclosures of your protected information made for purposes other than treatment, payment, healthcare operations, disclosures excluded by law

	<p>or those you have authorized. A nominal fee can be charged for the record search and preparation of the accounting of disclosures.</p>
Revoke your Authorization	<ul style="list-style-type: none"> ➤ You may revoke your authorization or consent to share your information at any time by accessing the list of service providers through the tokenized link sent via email by CommuniCare at the time of consent. Access through this link will be available to you for 365 days from the receipt of the email. ➤ You may revoke access to a single service provider, multiple service providers, or you may revoke your entire authorization. If you wish to revoke your entire authorization, you must provide this request in writing by mailing your request to the address listed below. ➤ If you revoke your authorization or consent, it will be effective for future uses and disclosures of your protected information. ➤ Once your authorization has been revoked, we will render your record inaccessible, and our referral partners will no longer be able to see your information in our system. ➤ However, the revocation will not be effective for information that we have used or disclosed to a referral partner in reliance on your authorization or consent and before receipt of your written revocation. ➤ After revocation, we will continue to store and use your information internally for our own business purposes, including auditing, accounting, training, and quality improvement. ➤ A client can revoke a revocation and opt back into CommuniCare at any time.
Notified of a Breach	<ul style="list-style-type: none"> ➤ You have the right to be notified in the event that we (or one of our business associates) or referral providers discover a breach of your unsecured protected information. ➤ We may notify you in writing, by email, or by other electronic means.
Complaints:	<ul style="list-style-type: none"> ➤ If you feel that your rights have been violated, you may file a complaint with us, or the Secretary of the U.S. Department of Health and Human Services. ➤ There will be no penalty or retaliation for you making a complaint.
Get a copy of this notice:	<ul style="list-style-type: none"> ➤ We will post a copy of the current notice on our website at https://wyoming211.org/partners/communicare-cie/. ➤ A paper copy of the notice currently in effect will be available at Wyoming 211, 2617 E. Lincolnway, Suite E, Cheyenne, WY 82001. You have a right to receive a paper copy of this Notice and a copy will be mailed to you upon request.
How to Obtain a Copy of this Notice:	<ul style="list-style-type: none"> ➤ We will post a copy of the current notice on our website at https://wyoming211.org/partners/communicare-cie/. A copy of the notice currently in effect will be available at Wyoming 211, 2617 E. Lincolnway, Suite E, Cheyenne, WY 82001. You have a right to receive a paper copy of this Notice and a copy will be mailed to you upon request.

Information Collection

Information we collect about you:

To address your needs and connect you to appropriate providers in our network, CommuniCare may collect and keep a record of information about you.

- We may collect your name, telephone number, address, and email to help us contact you.
- We may collect the names, telephone numbers, addresses, and email addresses of family members and caregivers if you share them with us.
- We may collect your age, gender, race, ethnicity, or tribal enrollment status, and your finances, employment, or housing needs to help us determine services for which you are eligible and what might best meet your needs.
- We may collect healthcare information about you that is protected by state, tribal, and federal privacy laws, including information about your medical providers, physical and mental health conditions, health insurance and care team, and health needs and goals.
- We may collect military background, information about the community programs you have been or are currently enrolled in, and other information that may be required to determine if you are eligible for government benefits, tax credits, income/debt assistance, insurance coverage, housing assistance and other programs and services offered by our referral providers.

How we collect information about you:

- We may collect information directly from you. This information is considered “self-reported” information and may come from a variety of sources. The information you provide to us may come through our website or when you speak to one of our representatives or network partners. When you provide us with self-reported information, you give us permission to share the information with staff members within the organization you are speaking with or other members of the network depending on the choices you make about sharing your information. The information we disclose depends on how you give us authorization when you participate with a service provider(s) in our network.
- We may collect information from our Partners that provide your health care and/or community services.
- We may collect protected information from your healthcare provider.

Uses of Information and Disclosures

The Use and Sharing of Your Information:

You will be asked by a Wyoming 211 Community Resource Specialist, a CommuniCare Navigator, or a CommuniCare Network Partner to authorize us to collect information about you, and/or to use or share your information. Your authorization or consent will permit us to use your information in the following ways:

To contact you:

- Partners may contact you, a family member, or a care giver that you have shared with us.
- We may use the information to communicate necessary information about your appointments, to update you on your care or care management options, programs and benefits you or your family may be eligible for, or to connect you with any of our referral network providers and to follow up with our referral providers about services you have received or programs you have enrolled in.

To verify your identity:

- We may use your protected information or require you to provide us with personal identification to verify your identity and link it to your record or communicate with you about your information.

To coordinate your services:

- Partners may make referrals and contact other network providers on your behalf and share your information to provide services to you.
- Partners may use your information to determine your eligibility for a health or community service or refer you to receive services.
- Our referral network providers may include doctors, nurses, and other healthcare professionals, public health agencies and officials, insurers, social workers, housing officials, and other professionals that provide or coordinate healthcare, mental health or behavioral health treatment, housing, and emergency shelter, transportation, education, food and financial assistance among other things.
- Wyoming 211 staff may also share information about you to coordinate the referral of services you need to and amongst members of our referral network.

To operate the CIE:

- We may use your Information or share it with our service providers as necessary to run the Network, improve your care, or contact you when necessary.
- We may combine your Information with that of others in a way that does not identify you to evaluate our effectiveness, understand community needs, and help fill gaps in services.
- We may use and share your Information to deliver, provide, and/or improve our products and services.

Disclosures required by law:

We are allowed – sometimes even required – to share your information in certain ways. Usually, these involve the public good, such as public health and research. We must follow many legal rules before we can share your information in these cases. For more information, see:

www.hhs.gov/ocr/privacy/hipaa/understanding/consumers/index.html.

Public Health and Safety issues: We can share health information about you for certain situations to:

- Prevent disease
- Help with product recalls
- Report adverse reactions to medications
- Report suspected abuse, neglect or domestic violence
- Report possible fraud to government agencies
- Prevent or reduce a serious threat to anyone's health or safety

- **Do research:** We can use or share your information for health research.
- **Comply with the law:** We will share information about you when state or federal laws say we must, even if it is just to show that we are following this privacy law.
- **Address workers' compensation, law enforcement, and other government requests:** We can use or share health information about you:
 - For workers' compensation claims
 - For official law enforcement purposes
 - With health oversight agencies as allowed by law
 - For military, national security, and presidential protective services
- **Shared Medical Records/Health Information or Social Information Exchanges:** Some of our referral providers maintain protected information about their clients in a common electronic record that allows business associates to share protected information. We may participate in various electronic health or social information exchanges that facilitate the sharing of protected information among healthcare, health and human service agencies, or other referral network providers.
- **Respond to lawsuits and legal actions:** We can share health information about you when a court orders us to share it.

Other Uses and Disclosures of your Protected Information

Disclosures Requiring your written authorization:

- Most uses and disclosures of psychotherapy notes, substance use disorders, and uses and disclosures of protected health information, disclosures for marketing purposes and disclosures that constitute the sale of protected information require your written authorization. A written authorization may be created in paper or electronic format. Once received, we will store a copy of your authorization electronically.

Ways in which we will not use your information:

- We will only use your Information for fundraising efforts if combined with Information of others so you cannot be identified.
- We will not use your Information for marketing.
- We will not sell your Information.

FOR MORE INFORMATION ON THIS NOTICE OF PRIVACY PRACTICES: Contact the Wyoming 211/CommuniCare Privacy Officer at 307-433-3075 or toll-free at 888-425-7138 if you have any questions about this notice or if you want more privacy information.

Requests: Please submit all requests, complaints or concerns in writing to our Privacy Officer at: Wyoming211/CommuniCare, Attn: Privacy Questions, 2617 E. Lincolnway, Suite E, Cheyenne, WY 82001. admin@wyoming211.org.

Changes to the Terms of this Notice: We reserve the right to change the terms of this notice, and the changes will apply to all information we have about you as well as any protected information we receive about you in the future.

For more information see: www.hhs.gov/ocr/privacy/hipaa/understanding/consumers/noticepp.html.