



Section I. Privacy Policy

Board of Health Approved: 6.6.2019

Policy Purpose

Privacy of the agency's clients/patients is vitally important to Huron County Public Health (HCPH). A privacy policy is a statement that discloses some or all of the ways an agency collects, uses, discloses, and manages the data of its patients/clients which fulfills a legal requirement to protect a patient's/client's privacy. It also describes how clients can obtain access to this information.

Client Privacy

Personal Data Collection

Personal data (i.e. name, address, email address, etc.), which identifies a person from the information provided, may be collected through a variety of programs and services offered by HCPH in each of the agency's divisions. This data may be collected electronically via cloud-based applications and/or web-based applications, paper form/written transmission, and/or verbal transmission. All personal data collected is kept secure and confidential, in compliance with the agency's [Data Security Policy](#) and applicable state and federal law. Data is maintained as detailed in the agency's [retention schedule](#).

Personal Data Use

If a client chooses, or is required to provide the agency with personal data for programmatic purposes, HCPH may use that information to contact the client, respond to a client's message, or provide the information and/or services requested by the client. This information may also be shared, as required, by county, state and federal agencies and grantors. However, HCPH will not disclose, sell, or transfer any personal information about clients, unless required by a county/state/federal agency, grant requirement/grantor, law enforcement, or statute.

In order to better serve the public, HCPH may also analyze aggregate personal data for the purposes of continuous quality improvement, program planning/revision, to inform policy decisions, public advocacy, etc.

Public Records

HCPH is a public office, as defined in [ORC 149.011](#). As such, local government entities create records (defined in [ORC 149.011](#) and [ORC 1306.01](#)) that must be safeguarded and made accessible to the public, in accordance with the requirements set forth in the [Ohio Public Records Act](#). Clients should be aware that, subject to certain statutory exceptions, most documents and records maintained by HCPH are public records under Ohio law ([ORC 149.43](#)) and may be subject to disclosure pursuant to a public records request.

Medical Patient Privacy

HCPH maintains medical information about patients to help provide medical care and because the law requires the agency to do so.

The [Health Insurance Portability and Accountability Act \(HIPPA\)](#), a federal law passed in 1996, affects the healthcare and insurance industries. The Standards for Privacy of Individually Identifiable Health Information ("Privacy Rule") establishes a set of standards for the protection of certain health information, and was issued in order to implement the requirement of HIPPA. A major goal of the Privacy Rule is to assure that

individuals' health information is properly protected while allowing the flow of health information needed to provide and promote high quality health care and to protect the public's health and wellbeing. The Privacy Rule strikes a balance that permits important uses of information, while protecting the privacy of people who seek care and healing. Every health care provider, including HCPH, who electronically transmits health information in connection with certain transactions, is a "covered entity" under HIPPA.

The HIPPA Privacy Rule protects all "individually identified health information" held or transmitted by a covered entity, such as HCPH, in any form or media, whether electronic, paper, or oral. The Privacy Rule calls this information "protected health information" or PHI. PHI is information, including demographic data, that relates to the individual's past, present, or future mental health or physical health condition, the provision of healthcare to the individual, or the past, present, or future payment for the provision of healthcare to the individual. The Privacy Rule defines and limits circumstances in which an individual's PHI may be disclosed. HCPH may disclose PHI as the rule requires/permits or as an individual who is the subject of the PHI authorizes in writing. There are no restrictions on the use or disclosure of de-identified health information. HCPH is further subject to protected health information regulations outlined in [ORC 3798.01](#).

HCPH uses electronic record systems to manage patient care. These systems have safeguards to protect the information in them. HCPH also has policies and trainings in place that limit the use of PHI to staff who need the information in order to do their job.

HCPH *must* disclose PHI only in two situations: (1) to individuals or their personal representatives specifically when they request access to, or an accounting of disclosures of, their PHI; and (2) to the Department of Health and Human Services (HHS) when it is undertaking a compliance investigation or review or enforcement access.

In addition, doctors and other healthcare providers who are not employed by HCPH may share information they have about a patient with HCPH employees in order to provide patient care, without a signed patient authorization. Similarly, HCPH is also *permitted*, though not required, to use and disclose PHI without a patient's consent/authorization for the following purposes/situations:

- **To the individual of which the PHI is subject;**
- **Treatment** (the provision, coordination, or management of health care and related services for an individual by one or more health care providers, including consultation between providers regarding a patient and referral of a patient by one provider to another), **payment** (activities of a health plan to obtain premiums, determine or fulfill responsibilities for coverage and provision of benefits, and furnish or obtain reimbursement for health care delivered to an individual and activities of a health care provider to obtain payment or be reimbursed for the provision of health care to an individual), **and healthcare operations;**
- **Opportunity to agree or object** may be obtained by asking the individual outright, or by circumstances that clearly give the individual the opportunity to agree, acquiesce, or object. Where the individual is incapacitated, in an emergency situation, or not available, covered entities generally may make such uses and disclosures, if in the exercise of their professional judgment, the use or disclosure is determined to be in the best interests of the individual;
- **Incident to an otherwise permitted use and disclosure** that occurs as a result of, or as "incident to," an otherwise permitted use or disclosure is permitted as long as the covered entity has adopted reasonable safeguards as required by the Privacy Rule, and the information being shared was limited to the "minimum necessary," as required by the Privacy Rule;
- **Public interest and benefit activities** including those required by law, public health activities, for victims of abuse/neglect/domestic violence, health oversight activities, judicial and administrative proceedings, law enforcement purposes, decedents, cadaveric organ/eye/tissue donation, research, serious threats to health or safety, worker's compensation, and essential government functions;

- Limited data set for the purposes of research, public health, or healthcare operations (PHI from which certain specified direct identifiers of individuals and their relatives, household members, and employers have been removed, which may be disclosed for research, health care operations, and public health purposes, provided the recipient enters into a data use agreement with safeguards for PHI;

Staff should rely on professional ethics and best judgements in deciding which of the aforementioned uses and disclosures to make. When possible, written authorizations by the patient should be obtained prior to sharing information. Patient medical information will not be shared for other reasons than those described above unless a patient authorizes the sharing of information in writing. HCPH is not permitted to use patient information in order to conduct marketing/advertising activities unless a patient has specifically authorized the communication. HCPH is not permitted to sell patient health information unless the disclosure has been specifically authorized. The HIPPA Privacy Rules does not prevent child abuse reporting; HCPH staff may continue to report child abuse or neglect to the appropriate government authorities.

A full summary of the HIPPA Privacy Rule can be found at: <https://bit.ly/2lcgM94> and guidance on significant aspects of the Privacy Rule can be found at: <https://bit.ly/2lpknYI>.

Limiting Uses and Disclosures to the Minimum Necessary

HCPH must make reasonable efforts to use, disclose, and request only the minimum amount of PHI needed to accomplish the intended purpose of the use, disclosure, or request.

Patient Rights regarding PHI

HIPPA also emphasizes the importance of providing individuals with the ability to access and obtain a copy of their health information with limited exceptions, in a timely manner (no later than 30 calendar days from receiving the individual's request). Medical records created and maintained by HCPH are the custody of HCPH, but patients have the following rights:

- **The right to review and receive a copy of their medical information**, including billing records. HCPH may charge a fee to cover the cost of labor for copying, the supplies for printing/copying, mailing (postage), and other costs and supplies. HCPH also has the right to deny requests for certain information; if a request is denied, HCPH will explain the reason for denial to the patient;
- **The right to ask for a change in their medical information** if they believe it is incorrect or important information is missing. HCPH cannot remove any information from the record but can add new information to complete and/or correct the existing information. HCPH has the right to deny requests for certain information; if a request is denied, HCPH will explain the reason for denial to the patient.
- **The right to ask for a list of when their medical information was shared without written consent.**
- **The right to know if their information has been breached.**
- **The right to ask for limits on the use and sharing of their medical information** for treatment, payment, or operations purposes, or to individuals involved in your care, unless required by law.
- **The right to limit sharing of information with the patient's health plan or insurer.** To limit this information, a patient must ask prior to receipt of any services.
- **The right to ask HCPH to abide by confidential communications**, for example only in a certain way or at a certain place. However, if HCPH is unable to contact a patient using the ways/locations requested, the agency may contact a patient using any available information.
- **The right to obtain a paper copy of this privacy policy.** Patients may obtain a copy at Huron County Public Health, 180 Milan Avenue, Norwalk, Ohio.

A full explanation of individual rights under HIPPA to access their PHI can be found at: <https://bit.ly/2HKiNuS>.

Personal Representatives and Minors

Personal representatives must be treated the same as the individual, with respect to uses and disclosures of an individual's PHI, as well as an individual's rights under HIPPA. A personal representative is a person legally authorized to make health care decisions on an individual's behalf or to act for a deceased individual or the estate. There may be an exception if HCPH has a reasonable belief that the personal representative may be abusing or neglecting the individual, or that treating the person as the personal representative could otherwise endanger the individual.

In most cases, parents are the personal representatives for their minor children. Therefore, in most cases, parents can exercise individual rights, such as access to the child's medical record, on behalf of their minor children. In certain exceptional cases, the parent is not considered the personal representative. In these situations, state and local laws determine the rights of the parents to access and control the PHI of their minor children. If state and/or local law is silent as to the parent's access to the minor's PHI, HCPH has discretion to provide or deny a parent's access to the minor's PHI, provided that this decision is made by a licensed healthcare professional in the exercise of professional judgement.

Website Privacy

This portion of the agency's privacy policy has been created in regards to the information collection and use of the agency's websites. This Website Policy Statement is posted to HCPH's website, www.huroncohealth.com, for public consumption, as well as posted to other website domains managed by the agency.

Scope

Thank you for visiting Huron County Public Health (HCPH)'s website and reviewing our Privacy Policy. HCPH, a local county-level public health agency located in Huron County, Ohio, respects your privacy. This privacy policy governs our collection and use of personal information about you on HCPH's website, operated by HCPH, free of charge.

This page is used to inform website visitors regarding HCPH's agency policies with the collection, use, and disclosure of personal information of anyone who visits the agency's websites. Please note that the information we receive depends on what you do when visiting our site.

If you choose to visit HCPH's websites, then you agree to the collection and use of information in relation to this policy and signify your acceptance of the policy's terms and conditions. HCPH will not use or share your information with anyone except as described in this Privacy Policy.

Information Collection and Use

For a better experience while using HCPH's websites, we may ask that you provide us with certain personally identifiable information, including but not limited to your name, phone number, and postal address.

Any time you visit HCPH's websites, HCPH, as well as third parties including Facebook, Instagram, Twitter, Google Analytics, and other digital products may collect and use the following kinds of Personal Information:

- Information about your use of this website;
- Referrer URL/internet domain and IP address and other electronic data further described throughout this policy;
- The operating system and information about the browser used when accessing the site;
- The visit date and time;
- The pages visited;
- Information that you provide to HCPH via use of this website for the purpose of subscribing to our website services;

- Contact information to respond to your inquiries, to send information, and to send agency newsletters (only if opted-in, you may opt-out at any time) which you provide; and
- Information collected via surveys.

We collect such information for the following purposes:

- To provide and operate the services of this website and/or to improve our website;
- To improve our services, informational materials, and/or customer service;
- To complete newsletter registration;
- To obtain your feedback, information requests, comments, and complaints;
- To provide our website users with ongoing customer assistance and technical support;
- To be able to contact our visitors and users with generalized or personalized service-related notices and promotional messages; and
- To comply with any applicable laws and regulations.

Information You Provide Us

Do not send HCPH any confidential or proprietary information using this site. Any feedback, data, answers, questions, comments, suggestions, or ideas that you send to HCPH via this site will be treated as non-confidential and non-proprietary.

Surveys & Contests

From time-to-time, HCPH's websites may request information via surveys, questionnaires, or contests. Surveys or questionnaires may be used to poll your opinions or obtain additional data about you. Participation in these surveys or contests is completely voluntary and you may choose whether or not to participate (and therefore disclose this information). Information requested may include contact information (such as name and postal address) and demographic information (such as zip code, age level). Contact information will be used to notify the winners and award prizes.

Email Subscriptions

Email subscription services are offered by HCPH as a convenience to users who choose to receive information via this information channel. All information published via this subscription service is available on www.huroncohealth.com without the requirement to provide an email address.

In order to manage email subscription lists, HCPH retains the names and email addresses of subscribers, as well as other information they may have shared with us, logs of emails we send, and automatically generated email data used to send and improve email communications. HCPH will not sell, share, rent, or disclose the personal information of any person(s) registered for email subscriptions unless ordered by a court of law or via a public records request. Email subscriber service providers used by HCPH may collect and provide non-identifying information about the number of messages sent, clicks and open rates. If, at any time, you wish to stop receiving our messages, simply click the "Unsubscribe" link included in each email message. HCPH also reserves the right to remove email addresses from the email subscription list at any time.

Log Data

Whenever you visit our websites, we collect information that your browser sends to us that is called "Log Data." This Log Data may include information such as your computer's Internet Protocol ("IP") address which is used to connect your computer to the internet, internet browser version/types (Firefox, Chrome, etc.), pages of our website that you visit, the time and date of your visit, the length of visits to certain pages, clickstream patterns, page interaction information and other statistics.

Cookies and Web Beacons

Cookies are files with small amount of data that are commonly used as an anonymous unique identifier to keep track of your movements and actions on a website. These are sent to your browser from the website that you visit and are stored on your computer's hard drive.

HCPH's websites and authorized third parties may use cookies, web beacons, and other storage technologies to collection information and to improve HCPH's websites. You have the option to either accept or refuse these cookies, and know when a cookie is being sent to your computer. If you choose to refuse our cookies, you may not be able to use some portions of this website.

Device Information

Device type, operating system, settings, unique device identifiers and crash data may also be collected.

Service Providers/Third Party Vendors

HCPH may employ third-party companies and individuals for reasons including, but not limited to, the following:

- To facilitate our website/services;
- To provide the website on our behalf;
- To perform website-related services;
- To assist us in analyzing how our website is used;
- To provide measurement services; and
- To provide target and other marketing ads.

These services may be assisted by the use of reverse proxy technology, tracking codes, cookies, web beacons, log data, and device information.

These third parties may have access to your personal information in order to perform the aforementioned tasks assigned to them on our behalf, in order to complete the requested transaction/duties. However, these third-party companies are obligated not to disclose or use the information for any other purpose. HCPH will not share or sell your personal information with any unaffiliated third parties.

HCPH reserves the right to disclose information in special cases when we have reason to believe that disclosing this information is necessary to identify, contact, or bring legal action against someone who may be causing injury to or interference with (either intentionally or unintentionally) our rights or property, other visitors, or anyone else that could be harmed by such activities. We also reserve the right to disclose such information when we believe in good faith that the law requires it.

Reverse Proxy

Some third-party service providers with which HCPH contracts may use reverse proxy technology. When a consumer clicks a link to this website through an ad placed by a third party vendor, their router calls this site and redisplay the site to consumers with a few important changes.

Links to Other Sites

HCPH's websites may contain links to other websites, which are provided for convenience only. If you click on a third-party link, you will be directed to that site. The presence of a link does not imply total endorsement of the material(s) on the website(s) or association with the website's operators. Note that these external sites are not operated by HCPH. Therefore, we strongly advise you to review the Privacy Policy of each individual website. HCPH has no control over, and assumes no responsibility for the content, performance, privacy policies, practices, or use risks of any third-party sites or services.

When using our websites, your browser may also produce pop-up advertisements. These advertisements are most likely produced by other websites you have visited or by third party software installed on your device.

HCPH does not endorse or recommend products or services for which you may view a pop-up advertisement on your screen while visiting our site.

Children's Privacy

The Children's Online Privacy Protection Act of 1998 (COPPA), was enacted to protect the privacy of children under the age of 13. COPPA is applicable to websites/mobile apps operating under U.S. jurisdiction, running on servers that are hosted in the U.S., and/or operated by businesses with headquarters located in the U.S. territory.

COPPA applies to any kind of data that can be used to personally identify a child under the age of 13, such as: first and last name, email address, telephone number, physical address, instant message usernames, geolocation information, and any other data that, when combined, can identify an individual.

HCPH's websites do not address anyone under the age of 13. HCPH does not knowingly collect personal identifiable information from children under 13. In the case we discover that a child under 13 has provided us with personal information, we immediately delete this from our servers. If you are a parent or guardian and you are aware that your child has provided us with personal information, please contact us so that we will be able to do necessary actions.

Security

HCPH's websites are hosted on the Wix.com platform. Wix.com provides the online platform that allows HCPH to share our education, information, services, and resources with you. Your data may be stored through Wix.com's data storage, databases and the general Wix.com applications. Wix.com stores data on secure servers behind a firewall.

HCPH values your trust in providing your personal information, thus we are striving to use commercially acceptable means of protecting it. However, keep in mind that no method of transmission over the internet, or method of electronic storage is 100% secure and reliable, and absolute security cannot be guaranteed.

Public Records

Website visitors should be aware that, subject to certain statutory exceptions, most documents and records maintained by HCPH, including but not limited to electronic data contained on the agency's website, are public records under Ohio law. Therefore, information submitted through the agency's websites may be subject to disclosure pursuant to a public records request.

Changes to This Privacy Policy

HCPH reserves the right to modify this privacy policy at any time, so please review this page periodically for any changes. Website users will be notified of any changes to the Privacy Policy with an update to this page. These changes are effective immediately, after they are posted on this page.

Opting Out

Users can opt-out of the collection and use of information for ad targeting. They may do so by using a mechanism for exercising such choice by visiting: <https://allaboutdnt.com/>. Do Not Track (DNT) is a web browser setting that requests that a web application disable its tracking of an individual user. When you choose to turn on the DNT setting in your browser, your browser sends a special signal to websites, analytics companies, ad networks, plug in providers, and other web services you encounter while browsing to stop tracking your activity.

Additional mechanisms that can be used to opt out for information collection and use include: www.aboutads.info/choices, www.youronlinechoices.eu, and <https://www.reachlocal.com/trackingopt-out>.

If you no longer wish HCPH to process your data, please contact us at information@huroncohealth.com or send us mail to the postal address included in the "Contact Us" section of www.huroncohealth.com.

Disclaimer of Liability

The materials and information provided on HCPH's websites are provided to website users free of charge, "as is," without warranty of any kind, expressed or implied, including, but not limited to, the implied warranties of merchantability, fitness for a particular purpose, or non-infringement.

Unless otherwise noted, material presented on this site is considered local government information and is the public domain, meaning the information may be freely copied and distributed. However, we request that you use the appropriate attribution to HCPH. If materials are adapted or modified, HCPH asks that you remove all citations and logos of HCPH.

In no event shall HCPH be liable for any damages whatsoever, including special, indirect, consequential or incidental damages for loss of profits, revenue, use or data whether brought in contract or tort, arising out of or connected with HCPH's websites or the use, reliance upon or performance of any material contained in or accessed from HCPH's websites.

HCPH's websites are managed in the County of Huron, State of Ohio, United States of America. HCPH makes no representation that the material found on this site is appropriate or available for use in other locations. If you access this site from other locations, you are responsible for compliance with local laws.

BY USING THIS WEBSITE, YOU ACCEPT THESE TERMS.

Contact Us

If you have any questions or suggestions about our Privacy Policy, do not hesitate to contact us. HCPH's postal address is:

Huron County Public Health
180 Milan Avenue, Suite 8
Norwalk, Ohio 44857

HCPH can be reached via email at information@huroncohealth.com or via phone at 419-668-1652.

Social Media Privacy

HCPH has developed social media sites to share information, videos, educational information, etc. These social media sites include, but are not limited to, Facebook, Twitter, Pinterest, Instagram, Hootsuite, etc. These sites are intended to serve as a mechanism for communication between the public and the Health District on public health topics and as a forum to further the mission of the District.

Additional information on social media use can be found in the agency's most recent version of the Social Media Use Policy, Standards, and Operations.

Data Security Policy

HCPH protects agency information in all forms (written, spoken, recorded electronically or printed), including but not limited to, client information, medical patient PHI, social media data, and website data, from accidental or intentional unauthorized modification, destruction, or disclosure throughout its life cycle. Additional information about the protection of confidentiality, integrity, and availability of information, including the agency's security policy, anti-virus protection policy, remote access policy, passwords policy, information security responsibilities, information classification, and computer/information control can be found in HCPH's [Data Security Policy. Resolution 2013-36](#).