# MyHealth Route 66 Accountable Health Communities Screening Privacy Policy

Your healthcare provider participates with MyHealth Access Network in the Accountable Health Communities Model, a program that connects you with community and social service programs in addition to the health services you get from your health care provider. This includes programs that can help with housing, food, utilities, violence or transportation.

We need to collect information about you to connect you with the right programs. Information we collect could include your name, insurance identification numbers, and contact information.

# **Sharing Information Is Your Choice**

Sharing your information is your choice, and won't affect the services you get from your health care provider. If you decide not to provide your information, we may not be able to connect you with community and social services through this program. Information you give will never be used for immigration enforcement.

## Who Your Information Is Shared With

Your healthcare provider and MyHealth Access Network will share your information with the Tulsa and Oklahoma City County Health Departments, Centers for Medicare & Medicaid Services (CMS), the agency that administers the Accountable Health Communities Model. CMS may need to share your information with others, including: 1. Other federal, state and local government agencies (such as the Department of Justice); 2. Your authorized representative, if you have one; 3. A person or company hired by CMS to do official work; and 4. Anyone else as required or allowed by law.

# **Screening Privacy Policy Details**

The MyHealth Route 66 Accountable Health Communities Screening application and the associated MyHealth Route 66 Accountable Health Communities Screening website available at MyHealth Route 66 Accountable Health Communities Screening (jointly, "MyHealth AHC Screening") are owned and operated by MyHealth Access Network, Inc. ("us" "we" or "our"). This MyHealth Route 66 Accountable Health Communities Screening privacy policy (the "Privacy Policy") is intended to inform you of our policies and practices regarding the collection, use and disclosure of any information you submit to us through MyHealth AHC Screening. This includes "Personal Information," which is information about you that is personally identifiable such as your name, e-mail address, and other non-public information that is associated with the foregoing, as well as "Anonymous Information," which is information that is not associated with or linked to your Personal Information and does not permit the identification of individual persons.

#### **User Consent**

By accessing or otherwise using MyHealth AHC Screening, you agree to the terms and conditions of this Privacy Policy and the associated Terms of Service. You consent to the processing of your Personal Information and Anonymous Information according to this Privacy Policy.

# **Regarding Children**

Children under the age of 13 are not permitted to use MyHealth AHC Screening themselves, and we do not intentionally collect Personal Information from those who are under 13 years old. Protecting the privacy of children is very important to us. Thus, if we obtain actual knowledge that a user is

under 13, we will take steps to remove that user's Personal Information from the MyHealth AHC Screening system. We recommend that children between the ages of 13 and 18 obtain their parent's permission before submitting information over the internet. By using MyHealth AHC Screening, you are representing that you are at least 18 years old, or that you are at least 13 years old and have your parents' permission to use MyHealth AHC Screening. This policy does not prohibit a parent or guardian from using the MyHealth AHC Screening with the intent of helping a child.

# **Collection and Use of Information**

#### **Personal Information**

In general, we collect Personal Information that you submit to us voluntarily through MyHealth AHC Screening. We also collect information that you submit in the process of completing the MyHealth AHC Screening initial survey. When you use the MyHealth AHC Screening, we will collect any information you voluntarily provide. We may also request optional information to support your use of MyHealth AHC Screening, such as your gender, income level and other demographic information. If you choose to sign up to receive information about community resources that may be of interest to you, we will collect your email address. We do not collect content such as photos, information from social networks and credit card information.

#### **Personal Information from Other Sources**

We may receive Personal Information about you from other sources with which you have registered, entities who we have partnered with (collectively, "Partners") or other third parties. We may associate this information with the other Personal Information we have collected about you.

#### E-mail and E-mail Addresses

If you send an e-mail to us we will collect your e-mail address and the full content of your e-mail, including attached files, and other information you provide. We may use this e-mail address to contact you, if it is determined you are eligible for additional support services based on answers provided through MyHealth AHC Screening. You may indicate your preference to stop receiving further email communications as further detailed below.

## **Information Collected Via Technology**

As you use MyHealth AHC Screening, certain information may also be passively collected and stored on our or our service providers' server logs, including your Internet protocol address, browser type, and operating system. We also may use Cookies and navigational data like Uniform Resource Locators (URL) to gather information regarding the date and time of your visit and the solutions and information for which you searched and viewed. This type of information is collected to make MyHealth AHC Screening and solutions more useful to you and to tailor the experience with MyHealth AHC Screening to meet your special interests and needs.

An "Internet protocol address" or "IP Address" is a number that is automatically assigned to your computer when you use the Internet. In some cases, your IP Address stays the same from browser session to browser session; but if you use a consumer internet access provider, your IP Address might vary from session to session. For example, we, or our service providers, may track your IP Address when you access MyHealth AHC Screening to assist with location validation.

"Cookies" are small pieces of information that a website sends to your device while you are viewing a website. We may use both session Cookies (which expire once you close your web browser) and persistent Cookies (which may stay on your device until you delete them) to provide you with a more personal and interactive experience with MyHealth AHC Screening. Persistent Cookies can be removed by following your Internet browser help file directions. In order to use our services offered through MyHealth AHC Screening, your web browser must accept Cookies. If you choose to disable

Cookies, some aspects of MyHealth AHC Screening may not work properly, and you will not be able to receive our services.

#### **Use and Disclosure of Information**

We do not sell, trade, or rent the Personal Information that we collect with third parties.

In general, Personal Information you submit to us is used by us to provide you access to MyHealth AHC Screening, to fulfill the purpose for which you provide it, to improve MyHealth AHC Screening, to better tailor the features, performance, and support of MyHealth AHC Screening and to offer you additional information, opportunities, assistance and functionality from us and our Partners at your request.

We may provide your Personal Information to third-party service providers who work on behalf of or with us to provide some of the services and features of MyHealth AHC Screening and to help us communicate with you. Examples of such services include sending email, analyzing data, and providing customer service. We require our third-party service providers to promise not to use such information except as necessary to provide the relevant services to us. We may share some or all of your Personal Information with our third-party partners, or other third parties about whom you are otherwise notified and do not request to opt out of such sharing.

We may share Personal Information of individuals who are Medicaid or Medicare beneficiaries with the Centers for Medicaid and Medicare Services, which funds the project and requires this information to be shared in connection with the funding. You can learn more about how CMS handles your information at: www.cms.gov/AboutCMS/Agency-Information/Aboutwebsite/Privacy-Policy.html. CMS is authorized to collect your information under Section 3021 of the Patient Protection and Affordable Care Act (Public Law No. 111-148), as amended by the Health Care and Education Reconciliation Act of 2010 (Public Law No. 111-152). The Privacy Act System of Records Notice associated with this collection is the Master Demonstration, Evaluation, and Research Studies (DERS) for the Office of Research, Development and Information (ORDI), CMS System No. 09-70-0591, as amended, 72 Federal Register, 19705, Apr. 19, 2007. This statement provides the notice required by the Privacy Act of 1974 (5 U.S.C. § 552a(e)(3)).

We may also share Personal Information of individuals who are Medicaid or Medicare beneficiaries with the Tulsa City County Health Department and/or Oklahoma City County Health Department, who provide Navigation services for the project. We will not disclose any personal information to any third party for marketing purposes. This Privacy Policy does not cover the use of your personally identifiable information by such third-parties. If you do not want us to use or disclose Personal Information collected about you in the manners identified in this Privacy Policy, you may not use MyHealth AHC Screening.

Although we currently do not have a parent company, any subsidiaries, joint ventures, or other companies under a common control, we may in the future, and we may share some or all of your Personal Information with these companies, in which case we will require them to honor this Privacy Policy.

In the event we go through a business transition such as a merger, acquisition by another company, or sale of all or a portion of its assets, your Personal Information may be among the assets transferred. You acknowledge that such transfers may occur and are permitted by this Privacy Policy, and that any acquirer of ours or that acquirer's assets may continue to process your Personal Information as set forth in this Privacy Policy.

We may disclose your Personal Information if we believe in good faith that such disclosure is necessary to (a) comply with relevant laws or to respond to subpoenas or warrants served on us; or (b) to protect and defend our rights or property, you, or third parties. You hereby consent to us sharing your Personal Information under the circumstances described herein.

# **Third Party Sites**

MyHealth AHC Screening may contain links to other websites. Please be aware that we are not responsible for the privacy practices or the content of such other websites. We encourage our users to read the privacy statements of each and every website they visit. This Privacy Policy applies solely to information collected by us through MyHealth AHC Screening and does not apply to these third-party websites. The ability to access information of third-parties from MyHealth AHC Screening, or links to other websites or locations, is for your convenience and does not signify our endorsement of such third-parties, their products, their services, other websites, locations or their content.

## **Your Choices Regarding Your Personal Information**

We offer you choices regarding the collection, use, and sharing of your Personal Information. When you receive communications from us, you may indicate a preference to stop receiving further communications from us and you will have the opportunity to "opt-out" by following the unsubscribe instructions provided in the text message or e-mail you receive or by contacting us directly (please see contact information below).

Despite your indicated email preferences, we may send you administrative emails regarding MyHealth AHC Screening including, for example, administrative confirmations, and notices of updates to our Privacy Policy if we choose to provide such notices to you in this manner.

You may request deletion of your Personal Information by contacting us at ahchelp@myhealthaccess.net, but please note that we may be required (by law or otherwise) to keep this information and not delete it (or to keep this information for a certain time, in which case we will comply with your deletion request, only after we have fulfilled such requirements). When we delete Personal Information, it will be deleted from the active database, but may remain in our archives.

## **Feedback**

If you provide feedback to us, we may use and disclose such feedback for any purpose, provided we do not associate such feedback with your Personal Information. We will collect any information contained in such feedback and will treat the Personal Information in it in accordance with this Privacy Policy. You agree that any such comments and any email we receive becomes our property. We may use feedback to add to or modify our services without paying any royalties or other compensation to you.

# **Security**

We are committed to protecting the security of your Personal Information. We use a variety of industry-standard security technologies and procedures to help protect your Personal Information from unauthorized access, use, or disclosure. Even though we have taken significant steps to protect your Personal Information, no company, including us, can fully eliminate security risks associated with Personal Information.

## **Contact and Revisions**

If you have questions or concerns about our Privacy Policy, please contact us at: ahchelp@myhealthaccess.net. This Privacy Policy is subject to occasional revision at our discretion, and if we make any substantial changes in the way we use your Personal Information, we will post an alert on this page. If you object to any such changes, you must cease using MyHealth AHC Screening. Continued use of MyHealth AHC Screening following notice of any such changes shall indicate your acknowledgement of such changes and agreement to be bound by the terms and conditions of such changes.