



## **COMPASS PARTICIPANT HANDBOOK**

**Compass Academy**

*Compass Residential and Consulting*

2920 N Keystone Ave  
Indianapolis, IN 46218  
(317) 423-9350

[www.CompassRC.com](http://www.CompassRC.com)

## TABLE OF CONTENTS

Who is Compass?	1
What is Compass Academy?	1
The Compass Vision, Mission and Core Values	2
Compass Administrative Office Information	3
Compass Academy Scope of Service	4
From Referral to Intake	4
Notice of Termination of Services	5
Compass Academy Policy on Infectious Parasites and Illnesses	6
What are My Rights?	6
How do I Make a Complaint?	7
Activity Fees and Petty Cash	8
Information and Referral	8
Notice of Privacy Practices	13

## WHO IS COMPASS?

Compass was founded in 2010 as a human services agency that provides services and supports to individuals with disabilities, mental illness and addictions. All services are designed to help people realize their hopes, dreams and personal goals. At Compass, we believe that our agency's success is measured by the successes of the people we serve.

Compass offers a variety of developmental disabilities services funded by the Indiana Medicaid Waiver program, the Bureau of Developmental Disabilities Services, and private pay. All services are designed to support you in the direction of your choice, and can help with access to:

- community participation and integration
- education and training
- recreation
- meaningful day
- health supports
- advocacy
- counseling
- spiritual opportunities

## WHAT IS COMPASS ACADEMY?

The vision of Compass Academy is to provide individuals with intellectual and developmental disabilities engaging and exciting learning opportunities while guiding the direction of their chosen groups. Individuals will choose an Academy Pathway based on their interests and will complete a foundational course of study in preparation for participation in the Academy Market. Each Pathway will enable individuals to develop a specialized set of skills that can be transferred to all parts of their lives.

Academy Pathways include:

**Academy Café:** Individuals will learn the fundamentals of safe food handling, nutrition, budgeting, shopping and food preparation. Individuals will progress to advanced cooking, baking and recipe creation, with the opportunity to market and sell their creations. Let's get cookin'!

**Academy Sewing:** Individuals will learn sewing basics including using a sewing machine and following patterns to make basic garments. Individuals will progress to more advanced sewing techniques and will make items of their choosing, with the opportunity

to market and sell their creations. Aprons, scarves, handbags, drink cozies, dresses...the sky's the limit!

**Academy Arts:** Individuals will explore the basics of visual arts and crafting, including painting, pottery, and weaving. Individuals will progress to more advanced arts and crafting techniques and will make items of their choosing, with the opportunity to market and sell their creations. Let's make something great!

**Academy Press:** Individuals will learn the ins and outs of the media world including writing, interviewing, photography, design and so much more. Individuals will progress to publishing their own newspaper and managing social media sites, including a YouTube channel and Academy online blog. Extra, extra, read all about it!

## THE COMPASS VISION, MISSION AND CORE VALUES

All services and supports provided by Compass employees and agents will be rendered in accordance with our vision, mission, and core values.

It is the vision of Compass that all individuals with developmental disabilities will have an equal and valued place in their chosen communities.

The mission of Compass is to support individuals in finding opportunities to live a meaningful and fulfilling life in the direction of their choice.

Compass hopes to assist individuals by adhering to our guiding principles:

### 1. Self-Determination

Compass believes that all people have a rightful place in society. People with developmental disabilities are at risk of being devalued and may need help to attain valued social roles and valued lives. Compass is committed to assisting individuals in developing and maintaining relationships, opportunities, and living arrangements which are fulfilling, meaningful, and of the individual's choice. This includes the right of basic human dignity. People with developmental disabilities should be afforded the same dignity and respect as individuals without disabilities. Individuals will be encouraged to express individuality, make choices, select and maintain possessions, and will be afforded privacy and treated with respect.

### 2. Community Integration and Inclusion

Compass will support individuals to become valued members of the communities in which they live. This includes attending public school, seeking employment at

community businesses, shopping at local stores, using community recreation facilities, and receiving health services in the offices of community physicians, dentists, and clinics.

### **3. Meaningful Day**

Compass is committed to providing learning opportunities throughout an individual's day. These opportunities may occur on a formal basis as part of a daily schedule, or on an informal basis by taking advantage of every opportunity to address the individual's needs.

### **4. Person-Centered Service Delivery**

Compass will ensure that all services are provided based on how an individual's hopes and dreams determine a chosen direction.

### **5. Protection from Harm**

Compass is responsible for ensuring that the people we serve are safe from harmful environments, abuse, neglect, or exploitation. Compass is committed to providing the safest possible living and working environments for staff and individuals. It is our goal to increase safety and health consciousness and to reduce injuries and property damage.

## **COMPASS ADMINISTRATIVE OFFICE INFORMATION**

Compass operates seven offices across the State of Indiana. The main office is located in Indianapolis, IN. All Compass office locations recognize the following holidays: New Year's Day, Memorial Day, Independence Day, Labor Day, Thanksgiving, Christmas Day.

### **CORPORATE OFFICE**

Address:	9660 Commerce Drive Carmel, IN 46032
Hours of Operation:	Monday through Friday, 9:00 a.m. until 5:00 p.m.
Main Phone:	317-423-9350
Main Fax:	317-423-9355

### **COMPASS ACADEMY**

Address:	2920 N Keystone Ave Indianapolis, IN 46218
Hours of Operation:	Monday through Friday, 8:30 a.m. until 4:30 p.m.
Main Phone:	317-423-9350 317-423-9355

## COMPASS ACADEMY SCOPE OF SERVICE

Compass Academy will provide a combination of facility and community-based activities, including opportunities for community service. Services are funded through the CIH and FS Medicaid waivers.

Compass Academy will meet Monday through Friday, and individuals can choose between morning and afternoon sessions. Morning groups meet from 9:00 AM – 12:00 PM, and afternoon groups meet from 1:00 PM – 4:00 PM. A person who receives 1:1 service can also join a group with their dedicated staff for individualized support.

Compass Academy employees will not pass medications. Groups are designed to meet before and after usual med times.

## FROM REFERRAL TO INTAKE

When a call is made to Compass Academy to ask about our services, we will gather basic information about what your current needs are and what services Compass Academy can offer. If you are interested in pursuing services, we will assist you with completing the following steps in our application process:

1. We will set up a time for you and your family or provider to come in and meet with us. During this meeting we will take a tour of the facility and answer any questions that you have. We will also give you a Compass Academy Application.
2. We will talk with your case manager to request the following information during the referral process:
  - Plan of Care and services budget
  - Person-Centered Individualized Support Plan and service goals
  - Transportation needs
  - Medical needs
  - Behavioral status and needs
  - Staffing preferences and needs
3. You will complete the Compass Academy Application. If you have questions during this process, please call us and we would be happy to assist you.
4. Once your completed Application is received, we will review your paperwork and determine if we will be able to serve you effectively and successfully. We will call

you once a decision is made. If the Pathway you choose is full, you will be placed at the top of a waiting list. We will contact you when a spot becomes available in your chosen Pathway on a first come, first served basis.

## NOTICE OF TERMINATION OR SUSPENSION FROM SERVICES

**Suspension:** At the discretion of Compass Academy executive staff, services may be suspended in the following situations:

- Your medical needs cannot be safely met by agency staff
- The continuation of services would pose an immediate threat to your safety, the safety of other individuals receiving services, or Compass Academy employees and representatives

The length of the suspension will be for a period of time deemed sufficient by Compass Academy executive staff to ensure your safety and the safety of others.

If services are suspended, a verbal explanation will be given to you along with a written notice to you and/or your legal representative, other support team members, and BDDS. The written notice will include the reason for and length or time of the suspension. A support team meeting will be requested within five (5) days of the suspension to:

- Determine whether you can continue to be safely served
- Adjust your program and plans as appropriate

**Termination:** In the event that the Compass Academy feels that we can no longer meet your needs, a written notice of termination of services will be sent to you or your legal representative, the waiver case manager, and BDDS. Notices of termination of services will only be issued by Compass Academy executive staff.

The notice of termination of services will be given at a minimum of sixty (60) days prior to the actual termination date of services if the services being provided are of an ongoing nature. Compass Academy will continue to provide services to you until a new agency providing similar services is chosen and in place.

## COMPASS ACADEMY POLICY ON INFECTIOUS PARASITES AND ILLNESSES

In the event that you have or come in contact with bed bugs, lice, or scabies, please notify the Compass Academy Director immediately. You will need to stay home until we receive an official document stating that there is no longer any presence of infectious parasites. After review and approval of documentation, you will be permitted back into the facility.

In the event that you are ill, please stay home until you are feeling better. If you have a fever, meaning your temperature is above 98.6 degrees Fahrenheit, please stay home until you have been fever-free for 24 hours.

## WHAT ARE MY RIGHTS?

It is the obligation of Compass to ensure that you are informed annually of your rights. Compass is responsible for ensuring that you are treated with dignity and respect, and services are provided to you without violations of your rights.

### ***Your rights:***

1. You have the right to be treated humanely and to be protected from harm.
2. You have the right to meaningful and appropriate services.
3. You have the right to live and receive services in a safe, secure, and supportive environment.
4. You have the right for information to be confidential.
5. You have the right to complain about treatment or care and to have that complaint answered in a timely manner.
6. You have the right to be informed of your rights at least annually and in a manner in which you can understand.
7. You have the right to be free from abuse, neglect, exploitation or mistreatment. This includes but is not limited to being free from punishment, name calling and other verbal abuse, humiliation, intimidation, harassment, confinement, deprivation, unauthorized use of your property or identity, and financial abuse or exploitation.
8. You have the right to not be placed in a room or other area from which exit is prevented.
9. You have the right to be treated with dignity and respect.
10. You have the right to be free from restrictions involving sleep, shelter, food, drink, medical care, use of bathroom facilities, or prolonged restriction of movement, unless a doctor's order is being followed.



11. You have the right to not work or perform chores without payment, except for normal chores in your home or for volunteer work that you have chosen.
12. You have the right to regularly see your doctor, at your own expense.
13. You have the right to regular developmental and behavioral assessments.
14. You have the right to refuse treatment.
15. You have the right to be informed of all risks of treatment.
16. You have the right to be free from unnecessary physical or chemical restraints.
17. You have the right to personal privacy.
18. You have the right to meet privately with and communicate with persons of your own choosing.
19. You have the right to send and receive unopened mail.
20. You have the right to make and receive telephone calls privately, at your own expense.
21. You have the right to participate in social, religious and community activities of your choice.
22. You have the right to have and use appropriate personal possessions and clothing.
23. You have the right to have personal funds and property protected from misuse or misappropriation.
24. You have the right to have all alleged violations of your rights reported and investigated.
25. You have the right to be free from unnecessary medications and physical restraints.
26. You are not required to perform any type of service or work for Compass. If you do choose to work for Compass, you will be compensated at the prevailing wage for the job, commensurate with your abilities.

## HOW DO I MAKE A COMPLAINT?

Compass is committed to ensuring that complaints and critical incidents involving you are addressed promptly and appropriately to assess and protect your rights and agency integrity and operations. Complaints will be handled confidentially to the extent possible while ensuring resolution of issues and concerns.

Complaints can be made in writing or verbally. Grievance & Complaint forms are available:

- At each Compass office location
- Electronically on the Compass website  
([www.compassrc.com](http://www.compassrc.com), Compass Resources, Grievance & Complaint Form)

If you need help filling out the form, any Compass employee can provide assistance, and will be expected to do so.

You can also call any Compass employee to file a verbal complaint at any time. The person taking your call will complete the form and help you through the process. Any Compass employee who has observed, is involved in, or is told of a complaint is required to complete a Compass Grievance & Complaint Form. The form should be completed as thoroughly as possible.

Once a Compass Grievance & Complaint Form is received at the office, it will be given to Human Resources. Human Resources will determine who will be responsible for following up and will make sure that your complaint or grievance is resolved within two (2) weeks of receipt. Someone will contact you to let you know the outcome of the complaint including actions taken and resolution.

If Compass is unable to resolve your complaint, you can contact one of the following individuals to help you:

1. Your Waiver Case Manager

If you do not know your Case Manager's phone number, you can find it on your Individual Profile, your PCISP, or you can ask Compass staff to get it for you.

2. Your local BDDS office staff

- Indianapolis: 317-205-0101

3. The DD Ombudsman

- 1-800-622-4484

## **ACTIVITY FEES AND PETTY CASH**

Different Pathways may require a monthly fee to cover the cost of materials and supplies, as well as community expenses such as food and entry fees. Compass Academy will request activity fees and petty cash in writing monthly, based on planned activities.

If you are unable to afford activity fees, you can discuss options with the Compass Academy Director.

## **INFORMATION AND REFERRAL**

The Indiana Bureau of Developmental Disabilities Services (BDDS) administers funding for services for individuals with developmental disabilities in order for them to maximize their capabilities and to actively participate in the community. Local BDDS office contact information is included below.

## BDDS District Offices

The Bureau of Developmental Disabilities Services (BDDS) is a program of the Division of Disability & Rehabilitative Services, a division of the Indiana Family & Social Services Administration.

### District 1

110 W. Ridge Road  
Gary, IN 46408-2709  
Phone: 219-981-5313  
Toll Free: 1-877-218-3053 (V/VRS/711)  
Toll Free Fax: 1-855-455-4265  
Counties: Jasper, Lake, Newton,  
Porter, Pulaski & Starke

### District 2

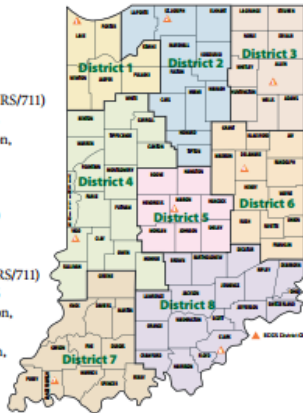
100 W. South Street, Suite 100  
South Bend, IN 46601-2435  
Phone: 574-232-1412  
Toll Free: 1-877-218-3059 (V/VRS/711)  
Toll Free Fax: 1-855-455-4266  
Counties: Cass, Elkhart, Fulton,  
Howard, Kosciusko, La Porte,  
Marshall, Miami, Saint Joseph,  
Tipton & Wabash

### District 3

201 E. Rudisill Blvd., Suite 300  
Fort Wayne, IN 46806-1756  
Phone: 260-423-2571  
Toll Free: 1-877-218-3061 (V/VRS/711)  
Toll Free Fax: 1-855-525-9370  
Counties: Adams, Allen, DeKalb,  
Huntington, LaGrange, Noble,  
Steuben, Wells & Whitley

### District 4

30 N. 8th Street, P.O. Box 10217  
Terre Haute, IN 47801-0217  
Phone: 812-232-3603  
Toll Free: 1-877-218-3096 (V/VRS/711)  
Toll Free Fax: 1-855-525-9374  
Counties: Benton, Carroll, Clay,  
Clinton, Fountain, Monroe,  
Montgomery, Owen, Parke, Putman,  
Sullivan, Tippecanoe, Vermillion,  
Vigo, Warren & White



### District 5

2620 Kessler Blvd. E. Dr., Suite 105  
Indianapolis, IN 46220-2890  
Phone: 317-205-0101  
Toll Free: 1-877-218-3530 (V/VRS/711)  
Toll Free Fax: 1-855-525-9373  
Counties: Boone, Hamilton, Hancock,  
Hendricks, Johnson, Marion, Morgan  
& Shelby

### District 6

201 E. Charles Street, Suite 130  
Muncie, IN 47305-2434  
Phone: 765-288-6516  
Toll Free: 1-877-218-3531 (V/VRS/711)  
Toll Free Fax: 1-855-525-9372  
Counties: Blackford, Delaware, Fayette,  
Franklin, Grant, Henry, Jay, Madison,  
Randolph, Rush, Union & Wayne

### District 7

700 E. Walnut Street  
Evansville, IN 47713-2561  
Phone: 812-423-8449  
Toll Free: 1-877-218-3528 (V/VRS/711)  
Toll Free Fax: 1-855-525-9375  
Counties: Daviess, Dubois, Gibson,  
Greene, Knox, Martin, Perry, Pike,  
Posey, Spencer, Vanderburgh &  
Warrick

### District 8

1452 Vaxter Avenue  
Clarksville, IN 47129-7721  
Phone: 812-283-1040  
Toll Free: 1-877-218-3529 (V/VRS/711)  
Toll Free Fax: 1-855-525-9376  
Counties: Bartholomew, Brown, Clark,  
Crawford, Dearborn, Decatur, Floyd,  
Harrison, Jackson, Jefferson, Jennings,  
Lawrence, Ohio, Orange, Ripley, Scott,  
Switzerland & Washington.



[www.ddrs.IN.gov](http://www.ddrs.IN.gov)  
1-800-545-7763

## RESOURCES

You may be able to receive services from a number of different resources. Talk to your case manager about some of the resources listed below. They may also know of other resources that you should pursue.

## CHOICE

A state-funded program under the Indiana Bureau of Aging and In-Home Services that provides supports to people who are elderly and disabled, including children. In-home services such as respite care, home modifications, personal assistance and other services can be provided. There is a waiting list for services.

Contact: Area Agencies on Aging, 1-800-986-3505

## **DEPARTMENT OF EDUCATION (DOE) FUNDING**

The Department of Education (DOE) offers funding for a variety of "wraparound" services for children enrolled in special education whose education program cannot be fully met by their local school district. These community-based services are individually planned to meet a child's needs, and plans are family-centered, rather than child-centered.

Contact: Local school system.

## **DEPARTMENT OF HEALTH**

The Children's Special Health Care Services covers a variety of medical needs for children who qualify (needs and income requirements).

Contact: 1-800-475-1355

## **DIVISION OF FAMILY RESOURCES (DFR) FUNDING**

The Division of Family Resources (DFR) offers funding for some services. Their CHINS Program (Children in Need of Services) ensures Medicaid eligibility and services for children who are wards of the State. Healthy Families program offers intensive services for at-risk children and their families. The First Steps program assures families with infants and toddlers (birth to age 3) experiencing developmental delays or disabilities have access to early intervention services close to home when they need them.

Contact: Local Division of Family Resources Office

## **EMPLOYMENT EARNINGS**

Individual's employment earnings or savings from that earning may constitute a personal resource that can pay for some of the services. If you are unemployed or want to be employed, discuss the possibility of employment with your case manager or BDDS Service Coordinator. Both BDDS and Vocational Rehabilitation Services (VRS) offer various work-related services.

Contact: Bureau of Developmental Disabilities Services

## **MEDICAID**

Medicaid is a medical insurance program, which funds medical services and equipment to eligible individuals. An individual must meet specific income and resources guidelines, based on the size of the family. Medicaid can also pay for a licensed residential facility, such as a group home.

Some individuals may be eligible to receive services through one of Medicaid's managed care programs, such as Hoosier Healthwise. An individual cannot be on a Medicaid

managed care program and also receive Medicaid waiver services; however, an individual receiving Medicaid waiver services can receive regular Medicaid medical services.

Contact: County Office of Division of Family Resources (DFR) to apply for Medicaid.  
Contact the Bureau of Developmental Disabilities Services to apply for Medicaid waivers or Medicaid funded residential services.

### **MEDICAID FOR EMPLOYEES WITH DISABILITIES (M.E.D. WORKS)**

Individuals with disabilities who are working can participate in this program and may pay a premium based on the earning to continue Medicaid coverage.

Contact: County Office of Division of Family Resources (DFR)

### **MEDICAID HOME AND COMMUNITY BASED SERVICES (HCBS) WAIVERS**

The Medicaid HCBS Waivers fund supportive services to individuals in their own homes or in community settings. The Medicaid waivers fund services to individuals who are at risk of institutionalization, meet the level of care specific to a waiver, and meet the financial limits established by the particular waiver. (For children under 18 years old, parental income is disregarded.) There are a limited number of slots for each waiver, so eligible individuals cannot receive services until there is a slot available for that individual.

An individual can be on the waiting list for any or all of the waivers, after meeting eligibility requirements; however, may receive services from only one waiver.

Contact: Bureau of Developmental Disabilities Services

### **MEDICARE**

Medicare is the nation's largest health insurance program and funds health care benefits for individuals who meet the eligibility criteria. Individuals must be at least 65 years old, or disabled, or have permanent kidney failure. Medicare has two parts – Part A is hospital insurance, Part B is medical insurance.

Contact: Local Social Security Administration office. Addresses and phone numbers can be obtained by calling 1-800-722-1213 or via the internet at <http://www.ssa.gov/>

### **SOCIAL SECURITY ADMINISTRATION DISABILITY INSURANCE (SSDI)**

Social Security Administration Disability Insurance (SSDI) provides a specified monthly benefit to individuals who meet eligibility requirements. An individual must have paid into the Social Security system for a minimum of 5 years (fewer years for individuals under 25) or be the widow/widower of an individual who has paid into the system. Children can receive SSDI benefits after the death or disability of a parent who paid into

the Social Security system. The amount of the monthly benefit is based on the individual's, spouse's, or parent's past income.

To be eligible for SSDI payments, an individual must meet the criteria of "disability", e.g. have a physical or mental impairment, or a combination of impairments that are long-lasting in nature or expected to last for at least a year, and the condition prevents the individual from working. Individuals who are approved for SSDI will have periodic reviews of their condition of disability, in order to ascertain if the individual continues to be disabled.

Contact: Local Social Security Administration office. Addresses and phone numbers can be obtained by calling 1-800-722-1213 or via the internet at <http://www.ssa.gov/>

### **SUPPLEMENTAL SECURITY INCOME (SSI)**

Supplemental Security Income (SSI) provides a specified monthly benefit to individuals who meet eligibility requirements. SSI can be paid to individuals who are disabled. To be eligible for SSI disability payments, an individual must meet the established eligibility criteria to be "disabled." For instance, the individual must have a physical or mental impairment, or a combination of impairments, that are long-lasting in nature or expected to last for at least a year, and the condition prevents the individual from working. The eligibility also includes an income limit that varies with the size of the family. The amount of the benefit is based on the individual's income and resources. Individuals who are approved for SSI disability will have periodic review of their conditions to ascertain if the individual continues to be disabled.

Contact: Local Social Security Administration office. Addresses and phone numbers can be obtained by calling 1-800-722-1213 or via the internet at <http://www.ssa.gov/>

### **TRUST FUNDS**

There are various types of trust funds, e.g. funds in a trust that has been established for the benefit of an individual. Families should consult a knowledgeable attorney or trust advisor when creating a trust. How a trust is established can determine whether or not trust funds count as a personal resource. Following is a brief description of trusts that may be established for an individual with a disability.

A trust is "available" to an individual with a disability if he or she has the unrestricted right, authority or legal ability to liquidate or dispose of trust property.

A trust is not "available" to the person with a disability if he or she does not have the unrestricted right, authority or legal ability to liquidate or dispose of the trust property.

"Special Needs Trusts" and "Pooled Trusts", if set up to meet specific guidelines under federal law, are not available to the person with a disability, and therefore would not count as a resource for means tested benefits such as SSI, the federal/state Medicaid program, or the state supported living program.

Information on Special Needs Trusts and Pooled Trusts is available from The Arc of Indiana at 1-800-382-9100 or via <http://www.arcind.org/>. This information is provided by The Arc Trust, which is sponsored by The Arc of the United States and The Arc of Indiana.

## **VOCATIONAL REHABILITATION SERVICES**

Vocational Rehabilitation Services (VRS) can provide any goods and services necessary to help an individual become employable. Vocational Rehabilitation Services provides individualized services for those who meet the eligibility requirements and want to work. To be eligible for services, an individual must have a physical or mental impairment, which creates or causes a substantial impediment to employment. The individual must require VRS services to prepare for, secure, retain, or regain employment.

Contact: Local Vocational Rehabilitation Services office. You may call 1-800-545-7763 and ask for extension 1319 to obtain local office numbers.

## **OTHER RESOURCES**

Your family may assist you in meeting some of your needs. You may also have other supports from friends, faith community, clubs, etc. that can help meet some of your needs. There may be other types of funding and/or supports available to you from agencies. Examples are United Cerebral Palsy, the Epilepsy Foundation or any not-for-profit community organization; support from a philanthropic individual/organization; or funds/gifts or willingness to volunteer for unpaid supports/assistance from a relative or friend. Your case manager can help you explore the availability of these funds.

## **NOTICE OF PRIVACY PRACTICES**

*Important: This notice describes how medical and other confidential information about you may be used and disclosed and how you can get access to this information. Please review it carefully.*

### Notice of Privacy Practices:

Compass will provide a Notice of Privacy Practices to all individuals receiving services upon admission to Compass and at least annually thereafter. Copies of the Notice will also be made available to all employees, agents and individuals at the Compass office.

The Notice describes Compass' privacy practices, individuals' legal rights, and how Compass is permitted to:

- a. Use and disclose PHI
- b. How a person can access and copy that information
- c. How a person can request amendment of that information
- d. How a person can request restrictions on Compass' use and disclosure of his/her PHI

Compass employees and agents are required to abide at all times by the practices described in the Notice of Privacy Practices.

#### Uses and Disclosures of PHI:

Compass may use PHI for the purposes of treatment, payment and health care operations, in most cases without written permission. Examples of use of PHI include:

##### *For Treatment*

This includes such things as verbal and written information that we obtain about an individual and use pertaining to his/her developmental disabilities services and treatment provided by Compass and other healthcare personnel.

Compass is not permitted to share information with another Medicaid waiver provider without a written authorization unless the individual has signed a waiver picklist for the provider, or the individual receives services from the provider as indicated by a current Notice of Action (NOA).

##### *For Payment*

This includes any activities we must undertake in order to get reimbursed for the services provided to individuals, including such things as organizing PHI and submitting bills to insurance companies, management of billed claims for services rendered, and collection of outstanding accounts.

##### *For Healthcare Operations*

This includes quality assurance activities, licensing, and training programs to ensure that our personnel meet our standards of care and follow established policies and procedures, obtaining legal and financial services, conducting business planning, processing grievances and complaints, and creating reports that do not individually identify individuals for data collection purposes.



Compass is permitted to use PHI without written authorization or opportunity to object in certain situations, including:

- As required by state or federal law.
- To a government authority if necessary to report abuse or neglect of a child.
- To a person legally authorized to investigate a report that an individual has been abused or has been denied his/her rights.
- For public health and health oversight activities Compass may disclose confidential information about an individual when Compass is required to collect information about disease or injury, for public health investigations, or to report vital statistics.
- To another healthcare provider or entity for the payment activities of the provider or entity that receives the information (such as an individual's healthcare services providers or insurance company).
- To another healthcare provider for the healthcare operations activities of the covered entity that receives the information as long as the covered entity receiving the information has or has had a relationship with an individual and the PHI pertains to the relationship.
- For healthcare fraud abuse detection or for activities related to compliance with the law.
- To a family member, other relative, or close personal friend or other person involved in an individual's care if Compass obtains verbal agreement to do so or if Compass gives the individual an opportunity to object to such a disclosure and the individual does not raise an objection. We may also disclose health information to an individual's family, relatives, or friends if Compass infers from the circumstances that the individual would not object.
- To avert a serious threat to health or safety Compass may disclose information to medical, law enforcement personnel or other persons who can reasonably prevent or lessen the threat of harm, if the individual or others are in danger and the information is necessary to prevent physical harm.
- To a public health authority in certain situations (such as reporting a birth, death or disease as required by law, as part of a public health investigation, to report child or adult abuse or neglect or domestic violence, to report adverse

events such as product defects, or to notify a person about exposure to a possible communicable disease as required by law).

- For health oversight activities including audits or government investigations, inspections, disciplinary proceedings, and other administrative or judicial actions undertaken by the government (or their contractors) by law to oversee the health care system.
- For judicial and administrative proceedings as required by a court or administrative order, or in some cases in response to a subpoena or other legal process.
- For law enforcement activities in limited situations, such as when there is a warrant for the request, or when the information is needed to locate a suspect or stop a crime.
- For military, national defense and security and other special government functions.
- To avert a serious threat to the health and safety of a person or the public at large.
- For workers' compensation purposes, and in compliance with workers' compensation laws.
- To coroners, medical examiners, and funeral directors for identifying a deceased person, determining cause of death, or carrying on their duties as authorized by law.
- If you are an organ donor, Compass may release health information to organizations that handle organ procurement or organ, eye or tissue transplantation or to an organ donation bank, as necessary to facilitate organ donation and transplantation.
- For research projects, but this will be subject to strict oversight and approvals and health information will be released only when there is a minimal risk to an individual's privacy and adequate safeguards are in place in accordance with the law.
- Compass may use or disclose health information about an individual in a way that does not personally identify or reveal who the individual is.

Any other use or disclosure of PHI, other than those listed above will only be made with an individual's written authorization. The authorization must specifically identify the information Compass seeks to use or disclose, as well as when and how Compass seeks to

use or disclose it. **An individual may revoke authorization at any time, in writing, except to the extent that Compass has already used or disclosed medical information based upon that authorization.**

Your Rights:

An individual has a number of rights with respect to the protection of his/her PHI, including:

*The right to access, copy or inspect his/her PHI.*

This means an individual may come to the Compass office and inspect and copy most of the information about the individual that Compass maintains. Compass will normally provide an individual access to this information within 30 days of the request.

*The right to request an amendment of his/her PHI.*

An individual has the right to ask Compass to amend written information that Compass maintains. If errors are found, Compass will generally amend an individual's information within 60 days of the request and will notify the individual when the information is amended. Compass is permitted by law to deny an individual's request to amend his/her information, but only in certain circumstances. For example, if Compass believes the information is correct and no errors exist, a request for amendment will be denied.

*The right to request an accounting of Compass' disclosure of an individual's PHI.*

An individual may request an accounting of certain disclosures of information that Compass has made in the last 6 years prior to the date of the request. Compass is not required to give an accounting of information used or disclosed for purposes of treatment, payment or health care operations. Compass is also not required to give an accounting of uses of PHI for which an individual has given written authorization.

*The right to request that Compass restrict the uses and disclosures of an individual's PHI.*

An individual has the right to request that Compass restricts how information is used and disclosed for treatment, payment or health care operations, or to restrict the information that is provided to family, friends and other people involved in an individual's health care. Requests must be made in writing to the privacy officer and must explain: what information an individual wants to limit and to whom the limits apply. However, if a restriction is requested and the information restricted is needed to provide an individual with emergency treatment, then Compass may use the PHI or disclose the PHI to a health care provider to provide an individual with emergency treatment. Compass is not required to agree to any restrictions you request, but any restrictions agreed to by Compass are binding on Compass.

*Internet, Electronic Mail, and the Right to Obtain Copy of Paper Notice on Request.*

Compass will prominently post a copy of the Notice on its web site and make the Notice available electronically through the web site. If an individual allows, Compass will forward the Notice by electronic mail instead of on paper and individuals may always request a paper copy of the Notice.

*An individual's Legal Rights and Complaints.*

Individuals have the right to complain to Compass, or to the Secretary of the United States Department of Health and Human Services if they believe their privacy rights have been violated. Individuals will not be retaliated against in any way for filing a complaint with Compass or to the government.

Revisions to the Notice:

Compass reserves the right to change the terms of this Notice at any time, and the changes will be effective immediately and will apply to all protected health information that we maintain. Any material changes to the Notice will be promptly posted in Compass facilities and posted to the website.

*Jennifer Sims, HR Director/ Privacy Officer, 317-423-9350, [Jennifer.Sims@CompassRC.com](mailto:Jennifer.Sims@CompassRC.com)*