STERLING URGENT CARE

Notice of Privacy Practices

RHC standards (QUAD A): QUAD A Medicare RHC Accreditation Standards Manual, Version 4.1: Standards 14-G-8, 14-G-9 and 14-G-10

UCA standards (CAUCQ): CAUCQ Accreditation | Qualification Standards Manual, 2026: PRR.1, PRR.1.B, PRR.1.C

Applies to: All Sterling Medical clinics (ID, UT, WY) and Sterling Provider Group. Effective date: 11/23/2026. Approved by: Scott Brown, CEO

THIS NOTICE DESCRIBES HOW MEDICAL INFORMATION ABOUT YOU MAY BE USED AND DISCLOSED AND HOW YOU CAN GET ACCESS TO THIS INFORMATION. PLEASE REVIEW IT CAREFULLY.

Sterling Medical, Sterling Urgent Care and Sterling Provider Group ("we" or "us") are required by law to protect the privacy of your protected health information (PHI), to give you this Notice of our legal duties and privacy practices, and to follow the Notice currently in effect. This Notice is posted in every clinic and on our website, and a paper copy is available at the front desk at any time. Staff give it to patients and offer an acknowledgment at the first visit (HP-1.11).

Where QUAD A and CAUCQ differ: QUAD A requires the clinic to keep record information confidential and to have written rules for the use, removal and release of records, including written patient consent where required (14-G-8, 14-G-9, 14-G-10). CAUCQ requires HIPAA privacy policies and a Notice of Privacy Practices that is displayed and offered to patients (PRR.1, PRR.1.B, PRR.1.C). This Notice is used at every clinic.

How We May Use and Share Your Information Without Your Written Authorization

1.1. **Treatment.** To treat you and coordinate your care with others, such as your pharmacist, specialists, other providers or a hospital.

1.2. **Payment.** To bill and get paid for your care, for example by sending information to your health plan.

1.3. **Health care operations.** To run our clinics and improve care, such as reviewing quality, evaluating staff and training.

1.4. **Appointment reminders.** To remind you of appointments and follow-up care.

1.5. **People involved in your care.** With a family member, friend or other person involved in your care or payment, unless you object, and to disaster relief organizations so your family can be told about your condition and location.

1.6. **Research.** Only as federal and state law allows. You will not be the subject of research without your written, informed consent.

1.7. **As required by law,** and to prevent a serious threat to your health or safety or that of others.

1.8. **Public health,** such as preventing or controlling disease, reporting reactions to medications or product problems, and reporting child abuse or neglect, or abuse, neglect or domestic violence when required or allowed by law.

1.9. **Health oversight** agencies for audits, inspections, investigations and licensing.

1.10. **Lawsuits and disputes,** in response to a court or administrative order, or a subpoena or other lawful request when efforts have been made to tell you or protect the information.

1.11. **Law enforcement,** as the law allows, for example in response to a court order or warrant, to identify or locate a missing person, or about a crime on our premises.

1.12. **Workers' compensation,** as state law allows.

1.13. **Organ and tissue donation; coroners, medical examiners and funeral directors; military and veterans; national security and protective services; and inmates,** as the law allows.

1.14. **Business associates** who perform services for us under a written agreement to protect your information (HP-3.3).

Uses That Require Your Written Authorization

1.1. Most uses of psychotherapy notes; uses of mental health records or substance use disorder treatment records as federal and state law require; most marketing; and any sale of your information.

1.2. Any other use not described in this Notice. You may revoke an authorization in writing at any time, except for information already shared in reliance on it.

1.3. Some information, such as HIV/AIDS, genetic and certain Medicaid information, has added protections under state or federal law, and we follow them.

1.4. Sterling Medical does not use your information for fundraising.

Your Rights

1.1. **Inspect and get a copy** of your records, in paper or electronic form, and have a copy sent to someone you choose. A reasonable, cost-based fee may apply.

1.2. **Ask us to correct** information you believe is incorrect or incomplete. We may deny the request in limited cases and will tell you why in writing.

1.3. **Get an accounting** of certain disclosures we made in the six (6) years before your request. The first list in any twelve (12) months is free.

1.4. **Ask us to limit** what we use or share. We do not have to agree, except that we must agree not to share information with your health plan about care you paid for in full out of pocket, unless the law requires it.

1.5. **Ask for confidential communications,** such as contact only by mail or at a certain number. Email may not be secure.

1.6. **Get a paper copy** of this Notice at any time, even if you agreed to receive it electronically.

1.7. **Be notified** if a breach of your unsecured information occurs.

1.8. Requests are made in writing on the Patient Rights Request form available at the front desk, and are answered within the time HIPAA allows.

Changes to This Notice

1.1. We may change this Notice, and the change will apply to all information we keep. The current Notice is posted in every clinic and on our website and is available at the front desk.

Questions and Complaints

1.1. If you believe your privacy rights have been violated, you may file a complaint with our Privacy Officer: **Taylor Hale, Privacy Officer, Sterling Medical; phone 208-360-0560; email thale@sterlingm.net.**

1.2. You may also file a complaint with the U.S. Department of Health and Human Services, Office for Civil Rights, 200 Independence Avenue, S.W., Washington, D.C. 20201, or at www.hhs.gov/ocr/complaints.

1.3. We will not retaliate against you for filing a complaint.

QUAD A, Medicare Rural Health Clinic (RHC) Accreditation Standards Manual, Version 4.1, effective February 2, 2026.

Standard 14-G-8: The clinic maintains the confidentiality of record information and provides safeguards against loss, destruction or unauthorized use. [42 CFR 491.10(b)(1)]

Standard 14-G-9: The clinic has written policies and procedures that govern the use and removal of records and the conditions for release of information. [42 CFR 491.10(b)(2)]

Standard 14-G-10: The clinic requires the patient's written consent before releasing information not authorized by law. [42 CFR 491.10(b)(3)]

CAUCQ (Commission on Ambulatory and Urgent Care Quality), Accreditation | Qualification Standards Manual, 2026.

Standard PRR.1, PRR.1.B and PRR.1.C (Privacy, Rights and Responsibilities): HIPAA privacy policies; Notice of Privacy Practices displayed and offered to patients.

Standards and Guidance

1.1. HIPAA Privacy Rule, 45 CFR 164.520 (Notice of Privacy Practices).

1.2. Confidentiality of Substance Use Disorder Patient Records, 42 CFR Part 2.

Related Sterling Medical Policies

1.1. HP-1.11 Patients' Right to Notice of Privacy Practices

1.2. AD-1 Patient Privacy and Confidentiality

1.3. HP-1.20 Authorizations

1.4. HP-1.36 Patient Complaint Management

1.5. HP-3.3 Business Associate Agreement