KDQOL-Complete™ Privacy Policy

Keeping your clinic data—and the personal health information of your patients—confidential and secure is an important part of the *KDQOL-Complete*™ service provided by the Medical Education Institute (MEI). We maintain physical, electronic, and procedural safeguards that comply with federal standards to safeguard your protected information.

This notice describes our policies and practices for collecting, storing, and protecting the information you entrust to us.

1. We apply high standards of *security* to safeguard your data and your patients' personal health information.

The *KDQOL-Complete* website is HIPAA compliant and uses a full range of internet security measures, including encrypted data transmissions, a secure server, Secure Socket Layer technology, and user-generated access IDs and passwords. (Passwords are oneway encrypted, and are not accessible to our employees).

2. We apply high standards of confidentiality to safeguard your data and your patients' personal health information.

Your clinic data and all information you enter into *KDQOL-Complete* (including your patients' personal health information, demographic data, survey scores, and results) can be accessed *only by the administrator who creates your KDQOL-Complete services account and users authorized by you* (see below for definition of "administrator" and "user") using a password created by you.

It is your responsibility to keep your passwords confidential and to change your password if you believe that your security has been compromised. You may change your password at anytime online.

To help you prevent unauthorized access to your *KDQOL-Complete* data, online sessions will be automatically discontinued (you will be logged off) if there is no activity in an online session for a period of 30 minutes. To resume work on *KDQOL-Complete* you will need to log on again, using your ID and password.

Note: *KDQOL-Complete* will transfer a small computer file (a "cookie") to your computer's hard drive when you log in. This file will enable *KDQOL-Complete* to authorize your access to the system.

Definitions:

Clinic The entity (a single, dialysis clinic @ one location) whose patient

data are grouped together for purposes of KDQOL-Complete

reporting and billing

Administrator The individual (dialysis professional) who registers a clinic and

provides his/her email as user ID for access to KDQOL-

Complete. The administrator can enter data, create reports, and authorize other users to gain access to the clinic data.

Note: The same administrator may register more than one clinic with KDQOL-Complete, but each clinic can have only one administrator.

All communications from MEI about *KDQOL-Complete* will be addressed to the administrator using the email address and/or mailing address provided.

User

An individual (dialysis professional) who is authorized to access *KDQOL-Complete* data for a particular clinic. Access is by unique email and user-generated password. *Note:* The same user may be authorized to access *KDQOL-Complete* data for more than one clinic if authorized by the administrator of each clinic.

3. We use your information to provide *KDQOL-Complete* services only in ways that are consistent with the Services and Data Use Agreement and the Business Associate Agreement.

MEI employees and subcontractors will have access to the data as needed to provide *KDQOL-Complete* services.

4. Research use of aggregate data.

Aggregate data from *KDQOL-Complete* — stripped of identifying information in order to qualify as a "limited data set" — may be used by the Medical Education Institute and/or its subcontractors to provide certain reports; however, at all times the use of such limited data set will be consistent with the requisite legal requirements and with our Services and Data Use Agreement.

5. Links to other sites.

If you use a link from the *KDQOL-Complete* website to a non-*KDQOL-Complete* site, these privacy policies and internet security measures no longer apply.

About the Medical Education Institute, Inc. The Medical Education Institute, Inc. is a nonprofit 501(c)(3), whose mission is to help people with chronic diseases learn to manage and improve their health.

By providing dialysis professionals with an easy and convenient way to score, interpret, report, and store health-related quality of life survey (KDQOL- 36^{TM}) information using *KDQOL-Complete*, we hope to help dialysis clinics improve patient care and outcomes.