



PRIVACY POLICY

It is important that you review this information, initial the box on the policies signature page and keep this for your records.

This notice describes how information about our patients/clients may be used and disclosed and how they can obtain access to this information.

Terms:

Any medical information, which could in any way identify an individual client, is considered **Protected Health Information (PHI)**. PHI will be used and disclosed only as needed for The Center of Communication and Language (CCL) to perform ***Treatment, Acquire Payment and Health Care Operations(TPO)**. Any other disclosure will require the written authorization of the client. In general, use or disclosure of PHI for purposes other than treatment, or a disclosure requested by the client, is limited to the **Minimum Necessary** to accomplish the intended purpose.

(***TREATMENT:** CCL PHILOSOPHY INCLUDES A TEN MINUTE "GROUP" PARENT MEETING AS A PART OF EACH GROUP SESSION TO DISCUSS WHAT HAPPENED DURING THE SESSION. DURING THIS TIME IT IS UNDERSTOOD THAT THE THERAPIST WILL SPEAK OPENLY TO ALL THE PARENTS ABOUT ALL THE STUDENTS IN THE GROUP WITH REGARD TO THEIR PARTICIPATION AND THINGS THEY NEED TO WORK ON AT HOME. THE THERAPIST WILL MAKE EVERY ATTEMPT TO HAVE THESE DISCUSSIONS IN A PRIVATE SETTING.)

Access:

The following people will have access to PHI:

- The client when 18 years old or older.
- Parents or legal guardians of a minor.
- Parents of an adult client with written permission of client.
- Any person to whom the adult client has authorized, in writing, the release of PHI.
- CCL staff and contractors who are involved in providing care or administrative assistance.
- The client's health insurance company, for payment purposes.
- Public Health Services and regulatory officials, when required by law.
- An appropriate authority when a determination is made that the client may pose physical threat to themselves or others.
- Courts, when the request is accompanied by a duly executed subpoena.

Minimum Necessary:

Requests for disclosure of PHI for all purposes will be reviewed by the CCL Privacy Contact to assure that they meet the minimum necessary requirement.

Patient/Client Rights:

- Parent/Guardian of clients or adult clients have a right to see and obtain a copy of their PHI.
- Clients have a right to request limitations to the routine use of PHI for TPO.
- Clients have a right to request changes in their PHI.
- Clients have the right to see a list of all people to whom PHI has been disclosed. In order to meet this requirement, the Therapist must keep a disclosure log. The log must record all disclosures, both written and verbal.

Security:

Privacy measures are designed to protect the confidentiality of all PHI:- All staff will receive instruction about and be familiar with the CCL Privacy Policy.- All staff will exert due diligence to avoid being overheard when discussing PHI.- All records will be maintained in a secure environment.

Information with regard to grievances:

Clients who have complaints or concerns with regard to therapeutic management, please first contact your child's personal therapist to discuss your concern. If you feel that she has not been able to adequately address your needs, then please contact the Susan M. Abrams. If the Susan M. Abrams cannot handle them directly, she will bring them to the attention of the relevant employee at CCL. If you still feel that your complaint has not been resolved to your satisfaction, you can address complaints to the Secretary of the United States Department of Health and Human Services. CCL will not retaliate against any individual for filing a complaint.

Administration:

- Susan M. Abrams serves as the Privacy Contact.
- A designee of the CCL serves as the Center Security Officer.

Additional Resources on Health Information Privacy
Health Privacy Project
Georgetown University
www.healthprivacy.org
Office for Civil Rights
U.S. Department of Health & Human Services
www.hhs.gov/ocr/hipaa/

Please check and sign the Privacy Policy Acknowledgement form indicating you have read and understood these privacy policies.