

Notice of Privacy Practices

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

I. Your health Information Uses and Disclosures for Treatment, Payment, and Health Care Operations

Each time you visit Integrative Trauma Treatment Center (ITTC) for health care, a record of your treatment is made. This record contains such information as registration information, including identification and billing information, and treatment information, including symptoms, diagnoses, test results, and treatment plans. This record is referred to as your "medical record" or "health information," and includes both written and electronic records.

Under the Health Insurance Portability and Accountability Act of 1996 (a Federal Law also known as "HIPAA"), and federal regulations 42 CFR Part 2, ITTC providers are required to keep your personal and health information confidential and to provide you with notice of our legal responsibilities and privacy practices.

Definitions to help clarify some terms used throughout this notice:

"PHI" refers to *protected health information*, information in your health record that could identify you.

- "*Treatment, Payment and Health Care Operations*"

Treatment is the provision, coordination or management of your health care and other services related to your health care.

Payment is when reimbursement is obtained for your healthcare.

Health Care Operations are activities that relate to the performance and operation of ITTC.

- "*Use*" applies to activities within ITTC such as sharing, employing, applying, utilizing, examining, and analyzing information that identifies you. Your health care information is used:
 - To plan for your care and treatment
 - For communication among your health care professional
 - As a legal document describing the care you received
 - As a way for you or your insurance company to verify the services provide
 - For other similar activities that allow ITTC providers to operate efficiently and provide you with quality care.
- "*Disclosure*" applies to activities outside of Integrative Trauma Treatment Center such as releasing, transferring, or providing access to information about you to other parties.

II. Uses and Disclosures Requiring Authorization

Your clinician may use or disclose PHI for various purposes when your appropriate authorization is obtained. An "*authorization*" is written permission above and beyond the general consent that permits only specific disclosures. In those instances an authorization will also be requested from you before releasing this information. In the cases of minors, legal guardians must give permission for ITTC to share information about the minor in their custody and care. An authorization will also be requested from you before releasing your

Psychotherapy notes. "Psychotherapy notes" are notes made about conversations during an individual, group, joint, or family counseling session. These notes are given a greater degree of protection than PHI.

You may revoke all such authorizations (of PHI or psychotherapy notes) at any time, provided each revocation is in writing. You may not revoke an authorization to the extent that (1) ITTC has relied on that authorization; or (2) if the authorization was obtained as a condition of obtaining insurance coverage, and the law provides the insured the right to contest the claim under the policy.

- **Payment:** ITTC may need to give your health insurance plan information about your treatment in order to receive payment. ITTC may also tell your health insurance plan about treatment to obtain approval or to determine whether your plan will pay for treatment. ITTC may bill the person in your family who is responsible for payment of who pays for your health insurance.
- **Treatment:** ITTC providers may disclose your health information by phone, letter, fax, or computer to people not affiliated with ITTC who are involved in your medical care, such as your primary physician or a home health agency. An example of treatment would be when your clinician consults with another health care provider, such as your family physician or another clinician.
- **Workers Compensation:** If you file a worker's compensation claim, your records relevant to that claim to your employer or its insurer may be required to be released and your clinician(s) may be required to testify.
- **Appointment Reminders/ Additional Communications:** ITTC providers may use your health information to call you or send you a letter reminding you of an upcoming appointment. ITTC may also use your information to call or send you the results of tests or to give you other health communications.

III. Uses and Disclosures with Neither Consent nor Authorization

Your PHI may be released without your consent or authorization in the following circumstances:

- **Health Care Operations:** ITTC may use your health information for administrative activities, or for accreditation, certification, or licensing purposes. Your health information may be used to review the performance of ITTC providers involved in your care. Examples of health care operations are quality assessment and improvement activities, business-related matters such as audits and administrative services, and case management and care coordination.
- **Health Oversight:** ITTC providers may disclose health information to agencies that monitor our compliance with local, state and federal law.
- **Medical:** If you are experiencing a medical emergency and the health information is deemed vital ITTC may release your health information to medical personnel. ITTC may release your health information to the Food and Drug Administration if they need to contact you about medications that have been recalled or mislabeled. In the event of a court order, ITTC providers may release health information in the event of making a report to a public health authority (i.e. communicable disease).
- **Law Enforcement:** ITTC providers may disclose health information to the correct officials if a crime is committed on ITTC property or against an ITTC employee. ITTC providers may disclose health information to the correct officials if you are in custody of a correctional institution or other law enforcement agency.
- **Research:** If scientific research is approved and your non-identifiable information is necessary for the study.

- **Judicial or administrative proceedings:** If you are involved in a court proceeding, a lawsuit, or dispute, ITTC providers may disclose health information about you in response to a court order. This applies to subpoenas by the grand jury. The privilege does not apply when you are being evaluated for a third party or where the evaluation is court ordered. You will be informed in advance, if this is the case.
- **Child Abuse:** If there is reasonable cause to suspect that a child seen in the course of professional duties has been abused or neglected, or have reason to believe that a child seen in the course of professional duties has been threatened with abuse or neglect, and that abuse or neglect of the child will occur, ITTC clinicians must report this to the relevant county department, child welfare agency, police, or sheriff's department. Investigations by relevant county department, child welfare agencies, police or sheriff's department may result in request for treatment records and subsequent disclosure of PHI, including progress notes, to any agency investigating child abuse/neglect.
- **Adult and Domestic Abuse:** If your clinician believes that an elder person or an adult suffering from mental illness has been abused, exploited or neglected, such information may be reported to the relevant county department or DHS.
- **Serious Threat to Health or Safety:** ITTC may use and disclose your health information when necessary to prevent a serious threat to your health and safety or the health and safety of others. ITTC clinicians must warn the third party and/or take steps to protect you, which may include instituting commitment proceedings.

IV. Patients Rights and Duties of Integrative Trauma Treatment Center Care Providers

Patients Rights:

- *Right to an Accounting of Disclosure-* You generally have the right to receive an accounting of disclosures of PHI. This list will not include: Disclosures made to carry out treatment, payment and health care operations; Disclosures made to you; Disclosures made with your authorization; Disclosures made six years or more before the date your request is received. To request and accounting of disclosures, make your request in writing to the ITTC Director.
- *Right to a paper copy-* You have the right to obtain a paper copy of the most current Notices or Privacy Practices *upon* request within a reasonable amount of time, even if you have agreed to receive the notice electronically.

Integrative Trauma Treatment Center's Duties:

- Treatment providers are required by law to maintain the privacy of PHI and to provide you with a notice of legal duties and privacy practices with respect to PHI.
- ITTC reserves the right to change the privacy policies and practices described in this notice. Unless you are notified of such changes, however, ITTC Providers are required to abide by the terms currently in effect.

If policies and procedures are modified, you will be informed and provided a copy of the new practices if you request.

V. Effective Date, Restrictions and Changes to Privacy Policy

This notice will go into effect on September 1, 2017

ITTC reserves the right to change the terms of this notice and to make the new notice provisions effective for all PHI maintained and will provide you with a revised notice when changes are made.

VI. Contact and Complaint Information

Complaints: If you are concerned that privacy rights have been violated, or if you disagree with a decision made about access to your records, you may contact the Clinic Director, Sarah Dobey, LPC and discuss your concerns. If you would like to file a written complaint, grievance forms and instructions can be found at the front desk. If you file a complaint, you will not be punished, threatened, harassed, retaliated against, or subjected in any way to any negative consequences.

Integrative Trauma Treatment Client Rights and Responsibilities



ITTC recognizes the following Client Rights:

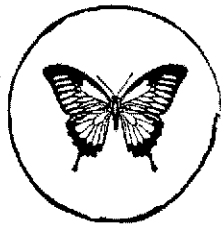
You have the right,

- To be treated with dignity and respect
- To have access to your treatment plan
- To choose from and receive available services and supports consistent with the plan
- To participate in the development of the plan
- To receive a copy of your treatment plan
- To have all services explained, including expected outcomes and possible risks
- To confidentiality and the right to consent to disclosure in accordance with OARS 107.154, 109.505, 179.507, 192.515, 192.507, and 42 CFR Part 2
- To give informed consent in writing prior to the start of services
- To access to your medical records
- To receive medication specific to the individual's diagnosed clinical needs
- To receive prior notice of service conclusion or transfer, unless it poses a threat to safety or health
- To be free from abuse or neglect and to report any incident of abuse or neglect without being subject to retaliation
- To have religious freedom
- To be free from seclusion and restraint
- To be informed of the policies and procedures, services agreements and fees applicable to the services provided.
- To have family involvement in service planning and delivery
- To file a grievance in regards to any and all services received
- To choose a provider and make changes as necessary
- To receive notice if your appointment has been cancelled in a timely matter.

ITTC expects the following Client Responsibilities:

You have the responsibility,

- To treat staff and other clients with dignity and respect
- To inform your provider of any changes in your behavior and/or physical or mental health status that could affect your care, including compliance with any prescribed medication
- To help your provider obtain past medical records
- To ask questions and get clarification regarding your diagnosis and suggested treatment plan
- To follow your provider's treatment recommendations
- To be prompt for scheduled appointments
- To cancel appointments if you are unable to keep them, so others may use the time slot
- To pay at the time of services rendered or inform Office Manager of financial hardships
- To be as open and honest with your provider as you can
- To inform your provider if you feel you are not making progress
- To adhere to the policies and procedures of ITTC
- To be aware of any insurance changes that may have occurred



Client Grievance Process & Feedback Form Acknowledgment

The Integrative Trauma Treatment Center welcomes feedback of any kind regarding the services we provide. If you are dissatisfied with anything regarding your experience here, you may make an informal complaint by talking directly with your clinician, the office manager, or clinical supervisor. You may also fill out a grievance and feedback form, which are available at the front desk. This form can also be used to provide any positive feedback or suggestions.

If you would like, you can email a grievance directly to the office manager (officemanager@itc.hush.com).

You will receive a phone call within one week to confirm your grievance was received and to discuss these concerns. Please note that you will only receive a call back in regard to a grievance (unless specified otherwise) and will only receive a call back if contact information is provided.



Safe Space Policies

Integrative Trauma Treatment Center is a trauma informed place for survivors and those embarking on their journey of healing through mental health. In order to maintain a welcoming and safe space, it is important for staff and guests to be mindful of their surroundings. The following policies are meant to be gentle reminders of how we can all work together to keep ITTC a safe place for everyone.

Group Therapy Policy:

When engaging in group therapy here at ITTC, please adhere to the following guidelines:

- Maintain confidentiality by not discussing group or group members outside of the group setting.
- Come on time and try to be present for others.
- Turn cell phones off during group
- Try to use preferred pronouns – ask if unsure.
- No racist, sexist, homophobic, or discriminatory comments will be tolerated.

Animal policy:

Service animals are welcome! All other animals are prohibited. The ADA authorizes the use of service animals in businesses (this would apply to businesses that are unrelated to housing or travel for companion animals as I understand the law) ONLY for the benefit of individuals with disabilities. A service animal is any guide dog or signal dog trained to provide assistance to a person with a disability. As defined by the ADA, dogs whose function is to provide comfort or emotional support DO NOT qualify as service animals. Service animals are trained working animals, not pets.

Attire policy:

Clients and staff agree to dress in a manner appropriate to the therapeutic setting. Any inappropriate or revealing attire may be grounds for removal from premises. In addition, please be considerate of others sensitivity to smells.

Waiting Room Electronic Policy:

Clients should refrain from out loud cell phone and other electronic use in the waiting area. Headphones should be used if a person is listening to something through an electronic device. Phone calls should take place outside of ITTC. If you need a private space to make a phone call, you may ask the receptionist if we have space available, but it is not guaranteed.



Electronic Communications Policy

Phone Communications:

Office staff are available by phone to address client needs. Scheduling and billing should go directly to the main office by phone. (971-226-6910 Option 2) Our staff works diligently to ensure clear communication with clinicians and can provide messages on your behalf. If you are experiencing an emergency, please contact 911, call Multnomah County crisis line, or go to your local emergency room.

Crisis line: 503-988-4888

Email Communications:

Our e-mail server is encrypted and is a good way to get in touch with administrative staff. The Office Manager can be reached at officemanager@ittc.hush.com.

For scheduling please email scheduling@ittc.hush.com.

Clinicians are generally not available between sessions to respond to e-mails. You are welcome to email your provider, but please be aware that in most cases you will not get a response and your clinician will discuss the content during your next session.

If you e-mail our staff, you are giving us permission to respond, even if the content contains personal medical or billing information, unless you specify otherwise in your original email.

Social Media:

Clinicians and staff of ITTC do not communicate with, or contact, any clients through any social media platforms, whether professional or personal in nature. ITTC does have a social media presence through Instagram, Facebook, and Twitter which is used purely for marketing purposes. If you comment, like, or subscribe to any ITTC content, please be advised that the privacy of those actions may be at risk.