

## Catholic Social Services of the U.P. Notice of Privacy Practices

*This Notice describes how mental health and substance abuse information about you may be used and disclosed and how you can get access to this information. Please review it carefully.*

### Summary

#### **We are required by law to:**

- ◆ Make Sure that protected health information is kept private.
  - ◆ Provide you with this Notice of our legal duties and privacy practices relating to your protected mental health and substance abuse information.
  - ◆ Follow the terms of the Notice that is currently in effect.
- Your protected mental health and substance abuse information may be used and disclosed for the purposes of treatment, payment, and behavioral healthcare operations and other limited circumstances.

#### **You have the following rights concerning your protected mental health and substance abuse information:**

- ◆ You may request restrictions on certain uses and disclosures.
- ◆ You may obtain a copy of your health records.
- ◆ You may request alternate methods of communications.
- ◆ You may request amendments.
- ◆ You may request and receive an accounting of disclosures.
- ◆ You may obtain a copy of this Notice.

### Privacy Practices

#### **We are required by law to:**

#### **Make sure that protected mental health and substance abuse information is kept private.**

Protected mental health and substance abuse information is information that identifies you and relates to your past, present, or future mental health and substance abuse condition and related healthcare services.

#### **Provide you with this Notice of our legal duties and privacy practices relating to your protected mental health and substance abuse information.**

The Notice also describes your rights with respect to protected mental health and substance abuse information about you.

#### **Follow the terms of the Notice that is currently in effect.**

We reserve the right to change our practices and this Notice and to make the new Notice effective for all protected mental health and substance abuse information we maintain. Upon request, we will provide the revised Notice to you.

#### **Uses and Disclosure of Protected Health Information**

Your protected mental health and substance abuse information may be used and disclosed by our behavioral healthcare professions who are involved in your care and treatment for the purpose of providing behavioral healthcare services to you. Your protected mental health and substance abuse information may also be used and disclosed to obtain payment for our services and to support the operation of our behavioral healthcare offices.

#### **The following are examples of ways we use and disclose protected mental health and substance abuse information:**

**Treatment:** We will use and disclose your protected mental health and substance abuse information to provide you with treatment or services. For example, information obtained by us may be used, as necessary, to contact you to provide appointment reminders or information about treatment alternatives or other mental health and substance abuse related benefits and services that may be of interest to you. We will also maintain records related to the care and services provided to you.

- ◆ **Payment:** Your protected mental health and substance abuse information will be used, as needed, to obtain payment for your mental health and substance abuse care services. For example, we will contact your insurer or other third-party payer to determine whether it will pay for the services we provided to you and to determine the amount of your co-payment.

- ◆ **Behavioral Healthcare Operations:** We may use or disclose your protected mental health and substance abuse information in order to support the operations of our behavioral healthcare offices and monitor the quality of the care we provide. For example, we may use information in your mental health and substance abuse record to evaluate the services our offices provide or to provide training to our staff.

#### **Other Uses and Disclosures**

In some limited situations, the law allows or requires us to use or disclose your protected mental health and substance abuse information for purposes beyond treatment, payment and operations. Not all of these situations will apply to us; some may never occur at our behavioral healthcare offices.

**As required by law:** We must disclose protected mental health and substance abuse information about you when required to do so by law.

**Worker's Compensation:** We may disclose protected mental health and substance abuse information about you as authorized by law and as necessary to comply with laws relating to worker's compensation or similar programs established by law.

**Public Health:** As required by law, we may disclose your protected mental health and substance abuse information to public health or legal authorities charged with preventing or controlling disease, injury, or disability.

**Law Enforcement:** We may disclose protected mental health and substance abuse information about you for law enforcement purposes as required by law or in response to a valid subpoena or other legal process.

**To avert a serious threat to health or safety:** We may use and disclose your protected mental health and substance abuse information when necessary to prevent a serious threat to your health and safety or the health and safety of the public or another person.

**Victims of abuse, neglect, or domestic violence:** We may disclose your protected mental health and substance abuse information to public authorities, as allowed, to report suspected abuse, neglect, or domestic violence.

**Health oversight activities:** We may disclose protected mental health and substance abuse information about you to an oversight agency for activities authorized by law. These oversight activities include audits, investigations and inspections, licensure and for the government to monitor the behavioral healthcare system, government programs, and compliance with civil rights laws.

**Business Associates:** There are some services provided by us through contracts with business associates. For example, we may use a collection service for overdue accounts. When we contract these services, we may disclose protected mental health and substance abuse information about you to our business associates so that they can perform the job we have asked them to do and bill you or your third-party payer for services rendered. To protect protected mental health and

substance abuse information about you, we require all business associates to appropriately safeguard the protected mental health and substance abuse information.

**Judicial and administrative proceedings:** We may disclose your protected mental health and substance abuse information in the course of any judicial or administrative proceeding, with your consent, or as directed by a court order signed by a judge or as allowed or required by law.

**Research:** We may disclose protected mental health and substance abuse information about you to researchers when their research has been approved by an institutional review board that has reviewed the research proposal and established protocols to ensure the privacy of your information.

**Organ or tissue procurement organizations:** Consistent with applicable law, we may disclose protected mental health and substance abuse information about you to organ procurement organizations or other entities engaged in the procurement, banking, or transplantation of organs for the purpose of tissue donation and transplant.

**Notification:** We may use or disclose your protected mental health and substance abuse information to notify, or assist you in notifying, a family member, personal representative, or another person responsible for your care, about your location and your general condition.

**Correctional institution:** If you are or become an inmate of a correctional institution, we may disclose protected mental health and substance abuse information to the institution or its agents when necessary for your health or the health and safety of others.

**Military and veterans:** If you are a member of the armed forces, we may release protected mental health and substance abuse information about you as required by military command authorities. We may also release protected mental health and substance abuse information about foreign military personnel to the appropriate military authority. In addition, we may release your protected mental health and substance abuse information to help determine eligibility for benefits by the Department of Veterans Affairs.

**National Security, intelligence activities, and protective services for the President:** We may release protected mental health and substance abuse information about you to authorized federal officials for intelligence, counter-intelligence, protective services to the President, and other national security activities authorized by law.

## Your Mental Health And Substance Abuse Information Rights

**You have the following rights regarding your protected mental health and substance abuse information:**

**You may request a restriction on certain uses and disclosures of your protected mental health and substance abuse information.**

You have the right to request additional restrictions on our use or disclosure of your protected mental health and substance abuse information either at our mental health and substance abuse care offices or by sending a written request to our Recipient Rights Coordinator. We are not required to agree to those restrictions.

**You may inspect or obtain a copy of your protected mental health and substance abuse information.**

You have the right to inspect or obtain a copy of your protected mental health and substance abuse information that we maintain in a designated record set. The designated record set may include treatment and billing records. You may make the request either at our behavioral healthcare offices or by sending a written request to our Recipient Rights Coordinator. We may deny your request to inspect and copy in certain limited circumstances. Our policy is to personally deliver or send the requested records to the person served at the address on record for the person served. We may charge a reasonable fee for copies, postage and supplies that are necessary to fulfill the request.

**You may request communications of protected mental health and substance abuse information by alternate methods.**

You have the right to request that we communicate confidential information to you by an alternate means. For example, you may request that we call you at your work telephone number when we need to change your appointment, etc. You must state how or where you would like to be contacted. We will accommodate all reasonable requests but we may require the request to be in writing.

**You may request an amendment to your protected behavioral healthcare information.**

You have the right to request that we change the records that we maintain about you if you feel that the information is incomplete or incorrect. You may make the request either at our behavioral healthcare offices or by sending a written request to our Recipient Rights Coordinator. In certain circumstances, we may deny your request for amendment. All denials will be made in writing. If we deny your request, you have the right to file a statement of disagreement with the decision and we may give a rebuttal to your statement.

**You may request and receive an accounting of disclosures of your protected mental health and substance abuse information.**

You have the right to receive an accounting of the disclosures we have made of your protected mental health and substance abuse information after April 14, 2003 for most purposes other than treatment, payment and operations. Such accounting of disclosures for persons served also excludes disclosures made to you, your family or friends involved in your care, or other disclosures that you authorize. The right to receive an accounting is subject to certain other exceptions, restrictions, and limitations. To request an account, make the request at the local CSSUP office or send a written request to our Recipient Rights Coordinator.

**You may obtain a copy of this Notice.**

You may ask for a paper copy of this Notice at any time, and one will be provided for you. Copies may be obtained from any of the local CSSUP offices.

**Our Legal Duties**

We will obtain your written authorization before using or disclosing your protected mental health and substance abuse information for purposes other than those listed in this Notice or as otherwise permitted or required by law. You may revoke an authorization in writing at any time. Upon receipt of the written revocation, we will stop using or disclosing protected mental health and substance abuse information about you, except to the extent that we have already taken action in reliance on the authorization or required by law.

**For more information or to report a problem:**

If you have questions or would like additional information about our privacy practices, you may contact our Recipient Rights Coordinator. If you believe your privacy rights have been violated, you can file a complaint with our Recipient Rights Coordinator and/or with the Secretary of Health and Human Services. We will not retaliate for filing a complaint.

**Contact the Recipient Rights Coordinator:**

**By Phone:** 1-800-562-9745 (ext. 118)  
(906) 227-9118  
**In Writing:** Linda Featherstone  
347 Rock Street  
Marquette, MI 49855

**Effective Date:** October 1, 2003

Revised: 9/12/13