



Compass Psychological Associates

Providing Direction and Hope for Children and Families

Serving the North Central Texas Region

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NOTICE OF PRIVACY PRACTICES

IN COMPLIANCE WITH THE FEDERAL REGULATIONS OF THE HEALTH INSURANCE PORTABILITY AND ACCOUNTABILITY ACT'S (HIPAA'S) PRIVACY RULE, THIS NOTICE DESCRIBES HOW MEDICAL AND/OR MENTAL HEALTH INFORMATION ABOUT THE MINOR MAY BE USED AND DISCLOSED AND HOW YOU, AS THEIR PERSONAL REPRESENTATIVE, CAN OBTAIN ACCESS TO IT.

COMPASS PSYCHOLOGICAL ASSOCIATES, hereinafter "Compass," is required by law to maintain the privacy of the Minor's mental health information and to provide you, as their Personal Representative, with a notice of its legal duties and privacy practices with respect to the Minor's mental health information. If you have questions about any part of this Notice, or if you want more information about the privacy practices at COMPASS, please contact:

Privacy Officer
Compass Psychological Associates
3417 Gaston Avenue, Suite 815
Dallas, Texas 75246
214-824-8878

I. HOW COMPASS MAY USE OR DISCLOSE THE MINOR'S HEALTH INFORMATION

Compass collects mental health information from the Minor, and his or her Personal Representative, and keeps it in a chart and on a computer. This is the Minor's medical record. The medical record is the property of Compass. The information in the medical record belongs to the Minor. Compass will keep this medical information confidential; however, the law permits Compass to use or disclose such health information for the following purposes:

The most common reasons we would use or disclose the Minor's health information is for treatment, payment or other standard internal business operations. We routinely use and disclose medical information on a daily basis within our offices; with the Minor's primary care physician, psychiatrist, and/or other health care facilities as is necessary for follow up and continuity of care; caseworkers with the Texas Department of Protective and Regulatory Services, foster parents and foster care agencies.

A. Treatment

An examples of how we might use or disclose mental health information for treatment purposes might include reminder calls for appointments, including leaving voice mail messages to confirm appointments; discussing behavioral concerns with caseworkers or members of the Minor's treatment team; obtaining copies of previous psychological evaluations from other providers and/or caseworkers.

B. Payment

Examples of how we might use or disclose information for payment purposes might include asking you about the Minor's medical insurance plans, Medicaid, or other sources of payment; preparing and sending bills to insurance providers, Medicaid, state medical assistance agency, to you, or any other payer responsible for paying such benefits; providing any information required by third party payers in order to insure payment for services rendered.

C. Health Care Operations

Examples of how we might use or disclose information for business operations might include financial or billing audits; internal quality assurance programs; defense of legal matters; business planning; certain research functions; Medicare or Medicaid audits.

While records and information collected will be kept confidential and will be held in accordance with state and federal regulations, records will be released regardless of written consent or authorization under the following circumstances:

- All cases in which there is a danger to self or others will be reported to law enforcement or other appropriate agency.
- All cases of physical and sexual abuse or neglect of a Minor will be reported to law enforcement or other appropriate agency.
- If a patient is in need of emergency services, appropriate emergency personnel will be contacted.

- All records subpoenaed by a Court will be released.
- Disclosures to business associates and contracted personnel who perform mental health care operations for *Compass* and who commit to respect the privacy of the Minor's protected health information.

II. WHEN *COMPASS* MAY NOT USE OR DISCLOSE THE MINOR'S HEALTH INFORMATION

Except as described in this Notice of Privacy Practices, *Compass* will not use or disclose the Minor's health information without written authorization from the Minor's Personal Representative or Legal Guardian. If you do authorize *Compass* to use or disclose the Minor's health information for another purpose, you may revoke your authorization in writing at any time.

III. MINOR'S HEALTH INFORMATION RIGHTS

- A. You have the right, as the Legal Guardian or Personal Representative of the Minor, to request restrictions on certain uses and disclosures of his or her health information. *Compass* is not required to agree to the restrictions that you request. This request must be made in writing to the Privacy Officer named at the beginning of this Notice.
- B. As the Legal Guardian or Personal Representative of the Minor, you have the right to receive his or her health information through a reasonable alternative means or at an alternative location. Examples might be verbal receipt as transmitted or otherwise relayed via contact by telephone at your home or office, or through use of some other specific telephone number for same purpose or through delivery or review or receipt at some alternative address other than that of *Compass*. We will accommodate these requests if they are reasonable. Requests for special communication must be made in writing to the Privacy Officer named at the beginning of this Notice.
- C. As the Legal Guardian or Personal Representative of the Minor, you have a right to inspect and copy his or her health information. All requests for review or copy of health information must be made in writing to the Privacy Officer named at the beginning of this Notice. We will respond to these requests as soon as possible, but no later than fifteen (15) days after receiving the request. *Compass* may impose a reasonable, cost based fee for copies.
- D. As the Legal Guardian or Personal Representative of the Minor, you have the right to request that *Compass* amend or change his or her health information if you think it is incorrect or incomplete. If we agree, we will make the amendment to the Minor's medical record and send the corrected information to you within thirty (30) days of your written request sent to the Privacy Officer named at the beginning of this Notice. *Compass* is not required to change the Minor's health information and if we do not agree, we will notify you in writing of our decision and how you can formally disagree with and/or challenge the denial.
- E. You have a right, as the Minor's Personal Representative or Legal Guardian, to receive an accounting of non-routine disclosures of the Minor's health information made by *Compass* within six (6) years prior to date on which accounting is requested. We will respond to your written request (presented to the Privacy Officer named at the beginning of this Notice) within sixty (60) days. Routine disclosures are exempt and might include any disclosures used for treatment, payment and business operations; persons involved in care or treatment of patient; law enforcement officials; or any that occurred before the compliance date of 4/14/03.
- F. The Minor, and his or her Personal Representative or Legal Guardian, have a right to obtain a paper copy of this Notice of Privacy Practices from our business offices by writing to the address shown at the beginning of this Notice.

IV. CHANGING OUR NOTICE OF PRIVACY PRACTICES

Compass is required by law to abide by the terms of this Notice, but reserves the right to change the terms of this Notice while remaining in compliance with the HIPAA and to make new the Notice provisions effective for all health information that it maintains.

V. COMPLAINTS

If you, as the involved Minor's Personal Representative or Legal Guardian, feel that anyone at *Compass* has not respected the privacy of the Minor's health information, you may complain to the Privacy Officer named at the beginning of this Notice and to the U.S. Department of Health and Human Services, Office of Civil Rights. *Compass* will not retaliate against the Minor, his or her Personal Representative, or Legal Guardian, if you choose to make such a complaint.

Effective Date of This Notice: April 14, 2003.