



Notice of Privacy Policy

This notice describes how medical information about you may be used and disclosed and how you can get access to this information. Please review this notice carefully.

Your health record contains personal information about you and your health. This information, which may identify you and relates to your past, present or future physical or mental health or condition and related health care services, is referred to as Protected Health Information ("PHI"). This Notice of Privacy Practices describes how Austin Therapy for Girls (ATFG) may use and disclose your PHI in accordance with applicable law. It also describes your rights regarding how you may gain access to and control your PHI.

ATFG is required by law to maintain the privacy of PHI and to provide you with notice of our legal duties and privacy practices with respect to PHI. We are required to abide by the terms of this Notice of Privacy Practices. We reserve the right to change the terms of our Notice of Privacy Practices at any time. Any new Notice of Privacy Practices will be effective for all PHI that we maintain at that time. We will provide you with a copy of the revised Notice of Privacy Practices.

How we may use and disclose health information about you:

For Treatment. Your PHI may be used and disclosed by those who are involved in your care for the purpose of providing, coordinating, or managing your health care treatment and related services. This includes consultation with clinical supervisors or other treatment team members. ATFG may disclose PHI to any other consultant only with your authorization.

For Payment. ATFG may use or disclose PHI so that we can receive payment for the treatment services provided to you. This will only be done with your authorization. Examples of payment-related activities are: making a determination of eligibility or coverage for insurance benefits, processing claims with your insurance company, reviewing services provided to you to determine medical necessity, or undertaking utilization review activities. If it becomes necessary to use collection processes due to lack of payment for services, we will only disclose the minimum amount of PHI necessary for purposes of collection.

For Health Care Operations. ATFG may use or disclose, as needed, your PHI in order to support our business activities including, but not limited to, quality assessment activities, employee review activities, reminding you of appointments, to provide information about treatment alternatives or other health related benefits and services, licensing, and conducting or arranging for other business activities. For example, we may share your PHI with third parties that perform various business activities (e.g., billing or typing services) provided we have a written contract with the business that requires it to safeguard the privacy of your PHI. For training or teaching purposes PHI will be disclosed only with your authorization.

Required by Law. Under the law, we must make disclosures of your PHI to you upon your request. In addition, we must make disclosures to the Secretary of the Department of Health and Human Services for the purpose of investigating or determining our compliance with the requirements of the Privacy Rule.

The following is a list of the categories of uses and disclosures permitted by HIPAA without an authorization:

**Abuse and Neglect
Emergencies
National Security**

**Judicial and Administrative Proceedings
Law Enforcement
Public Safety (Duty to Warn)**



Without Authorization. Applicable law and ethical standards permit us to disclose information about you without your authorization only in a limited number of other situations. The types of uses and disclosures that may be made without your authorization are those that are:

- Required by law, such as the mandatory reporting of child abuse or neglect or mandatory government agency audits or investigations (such as state licensing boards or health department)
- Required by Court Order
- Necessary to prevent or lessen a serious and imminent threat to the health or safety of a person or the public. If information is disclosed to prevent or lessen a serious threat, it will be disclosed to a person or persons reasonably able to prevent or lessen the threat, including the target of the threat.

Verbal Permission. ATFG may use or disclose your information to family members that are directly involved in your treatment with your verbal permission.

With Authorization. Uses and disclosures not specifically permitted by applicable law will be made only with your written authorization, which may be revoked.

Your Rights Regarding your PHI:

You have the following rights regarding your personal PHI maintained by our office. To exercise any of these rights, please submit your request in writing to our office:

- **Right of Access to Inspect and Copy.** You have the right, which may be restricted only in exceptional circumstances, to inspect and copy PHI that may be used to make decisions about your care. Your right to inspect and copy PHI will be restricted only in those situations where there is compelling evidence that access would cause serious harm to you. We may charge a reasonable, cost-based fee for copies.
- **Right to Amend.** If you feel that the PHI we have about you is incorrect or incomplete, you may ask us to amend the information, although we are not required to agree to the amendment.
- **Right to an Accounting of Disclosures.** You have the right to request an accounting of certain of the disclosures that we make of your PHI. We may charge you a reasonable fee if you request more than one accounting in any 12-month period.
- **Right to Request Restrictions.** You have the right to request a restriction or limitation on the use or disclosure of your PHI for treatment, payment, or health care operations. We are not required to agree to your request.
- **Right to Request Confidential Communication.** You have the right to request that we communicate with you about medical matters in a certain way or at a certain location.
- **Right to a Copy of this Notice.** You have the right to a copy of this Notice.
- **Electronic Transactions Standards.**

Complaints

If you believe ATFG has violated your privacy rights, you have the right to file a complaint in writing with our office or with the Secretary of Health and Human Services at 200 Independence Avenue, S.W., Washington, D.C. 20201, or by calling (202) 619-0257. We will not retaliate against you for filing a complaint.



Social Media Policy

This document outlines the Austin Therapy for Girls (ATFG) policy related to the use of Social Media. Please read it to understand how ATFG conducts itself on the Internet as a mental health office. As technology and the Internet changes, this policy may be updated accordingly. Changes will be presented to clients in writing. . If you have questions or concerns about any of these policies please feel free to bring them to our attention.

Friending

ATFG does not accept friend or contact requests from current or former clients on any social networking sites (Facebook, LinkedIn, etc). Adding you as a friend or contact on these sites can compromise your confidentiality and our respective privacy. It may also blur the boundaries of the therapeutic relationship.

Fanning

ATFG may keep a professional Facebook page to allow people to share its blog posts and practice updates with other Facebook users. All of the information shared on this page will be available on the ATFG website. ATFG will not accept clients as Fans of this Page, as it creates a greater likelihood of compromised client confidentiality.

Interacting

Please do not use SMS (mobile phone text messaging) or messaging on Social Networking sites such as Twitter, Facebook, or LinkedIn to contact ATFG. These sites are not secure and ATFG may not read these messages in a timely fashion. Do not use Wall postings, @replies, or other means of engaging with ATFG online. Engaging with ATFG in this way could compromise your confidentiality. It may also create the possibility that these exchanges become a part of your legal medical record and will need to be documented and archived in your chart. If you need to contact Shayna between sessions, the best way to do so is by phone. Direct email at info@austintherapyforgirls.com is second best for quick, administrative issues such as changing appointment times. See the email section below for more information regarding email interactions.

Use of Search Engines

It is NOT a regular part of ATFG to search for clients on Google or other search engines. Extremely rare exceptions *may* be made during times of crisis. If ATFG has a reason to suspect that you are in danger there *might* be an instance in which using a search engine to find you, find someone close to you, or to check on your recent status updates, becomes necessary as part of ensuring your welfare. If ATFG ever resorts to such means, the situation will be fully documented and discussed with you at your next appointment.

Location-based services

If you used location-based services on your mobile phone, you may wish to be aware of the privacy issues related to using these services. ATFG is not a "check-in" location on various sites such as Foursquare, Gowalla, Loopt, etc. However, if you have GPS tracking enabled on your device, it is possible that others may surmise that you are a therapy client due to regular check-ins at the ATFG office. Please be aware of this risk if you are intentionally "checking in," from my office or if you have a passive LBS app enabled on your phone.

Email

ATFG prefers using email only to arrange or modify appointments. Please do not email content related to your therapy sessions, as email is not completely secure or confidential. If you choose to communicate ATFG by email, be aware that all emails are retained in the logs of Internet service providers. You should also know that any emails ATFG receives from you, and any responses that ATFG sends to you, become a part of your legal record.

© Keely Kolmes, Psy.D. – Social Media Policy – 4/26/10