



Notice of Privacy Practices

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

Family Services Employee Assistance Program is committed to assisting you, the employee or family member, in taking the first step towards resolving personal difficulties. We are a confidential service and do not report identifying information to your employer or others without your written authorization, except as required by law. We do provide your company statistical information on the type and number of services utilized on a quarterly basis. These utilization reports contain no employee names, location, identification numbers or information that would permit a company to trace your identity.

We are required by applicable federal and state law to maintain the privacy of your health information. We are also required to give you this Notice about our privacy practices, legal obligations, and your rights concerning your health information ("Protected Health Information" or "PHI"). We must follow the privacy practices that are described in this Notice, which may be amended from time to time.

For more information about our privacy practices, or for additional copies of this Notice, please contact us using the information listed at the end of this Notice.

I. USES AND DISCLOSURES OF PROTECTED HEALTH INFORMATION (PHI)

A. Permissible Uses and Disclosures without Your Written Authorization

We may use and disclose PHI without your written authorization, excluding Psychotherapy Notes (which include EAP Evaluation and counseling notes) as described in Section 2, for certain purposes as described below. The examples provided in each category are not meant to be exhaustive, but instead are meant to describe the types of uses and disclosures that are permissible under federal and state law.

1. Treatment: We may use and disclose PHI in order to provide treatment to you. For example, we may use PHI in our assessment to determine an appropriate treatment plan or referral. In addition, we may

disclose PHI to other health care providers involved in your treatment plan to the extent that they need to know the information.

2. Payment: We may use or disclose PHI so that services you receive are appropriately billed to, and payment is collected from, your health plan. As EAP services are paid for by your employer and are confidential, we do not release identifying information to your employer and we do not normally bill your health plan. By way of example, if you are wishing to continue counseling beyond your EAP benefit we may disclose PHI to permit your health plan to take certain actions before it approves or pays for treatment services.

3. Health care Operations: We may use and disclose PHI in connection with our health care operations, including quality improvement activities, training programs, accreditation, certification, licensing or credentialing activities.

4. Required or Permitted by Law: We may use or disclose PHI when we are required or permitted to do so by law. For example, we may disclose PHI to appropriate authorities if we reasonably believe that you or someone else is a possible victim of abuse, neglect, or domestic violence or the possible victim of other crimes. In addition we may disclose PHI to the extent necessary to avert a serious threat to your health or safety or the health or safety of others. Other disclosures permitted or required by law include the following: disclosures for public health activities; health oversight activities including disclosures to state or federal agencies authorized to access PHI; disclosures to judicial and law enforcement officials in response to a court order or other lawful process; disclosures for research when approved by an institutional review board; disclosures to military or national security agencies, coroners, medical examiners, and correctional institutions; in the event of a medical emergency, emergency personnel or services providers may be given necessary information; if you bring a complaint against Family Services; in the event of the client's death or disability, information may be released if the client's personal representative or the beneficiary of an insurance policy on the client's life signs a release authorizing disclosure; in the event you reveal the contemplation or commission of a crime or harmful act; for auditing purposes or state licensing review; or as otherwise authorized by law.

B. Uses and Disclosures Requiring Your Written Authorization

We are bound by professional ethics to protect client rights to confidential communications in regards to their involvement in the Employee Assistance Program. For this reason, if information about your participation in any EAP service is to be released to anyone, we will require a signed "Release of Information" from you for any of the following:

1. Psychotherapy Notes (EAP Evaluation and Counseling notes): Notes recorded by your EAP professional documenting the contents of an assessment or counseling session with you ("Psychotherapy Notes") will be used only by your EAP Professional and will not otherwise be used or disclosed without your written authorization.

2. Marketing and Fundraising Communications: We will not use your health information for marketing or fundraising communications without your written authorization.

3. Other Uses and Disclosures: Uses and disclosures other than those described in Section I.A. above will only be made with your written authorization. For example, you will need to sign an authorization form before we can send PHI to a treatment program we may be referring you to. . You may revoke any such authorization at any time.

II. YOUR INDIVIDUAL RIGHTS

Right to Inspect and Copy.

You may request access to your medical record and billing records maintained by us in order to inspect and request copies of the records. All requests for access must be made in writing. Under limited circumstances, we may deny access to your records if we believe the information may be harmful to you or someone else. You have the right to appeal any denials. We may charge a fee for the costs of copying and sending you any records requested. If you are a parent or legal guardian of a minor 13 years or older, please note that certain portions of the minor's record that includes information pertaining to mental health, drug treatment or family planning will not be accessible to you.

Right to Alternative Communications.

You may request, and we will accommodate, any reasonable written request for you to receive PHI by alternative means of communication or at alternative locations.

Right to Request Restrictions.

You have the right to request a restriction on PHI we use or disclose for treatment, payment or health care operations. You must request any such restriction in writing addressed to the Privacy Officer as indicated below. We are not required to agree to any such restriction you may request.

Right to Accounting of Disclosures.

Upon written request, you may obtain an accounting of certain disclosures of PHI we make after April 14, 2003. This right applies to disclosures for purposes other than treatment, payment or health care operations, excludes disclosures made to you or disclosures otherwise authorized by you, and is subject to other restrictions and limitations.

Right to Request Amendment.

You have the right to request that we amend your health information. Your request must be in writing, and it must explain why the information should be amended. We may deny your request under certain circumstances.

Right to Obtain Notice.

You have the right to obtain a paper copy of this Notice by submitting a request to our Privacy Officer at any time.

Questions and Complaints.

If you desire further information about your privacy rights, or are concerned that we have violated your privacy rights, you may contact the **Privacy Officer** Keith Myers at 206-826-3050 X 126. You may also file written complaints with the Director, Office for Civil Rights of the U.S. Department of Health and Human Services. We will not retaliate against you if you file a complaint with the Director, our Privacy Officer, or one of our EAP Professionals.

III. EFFECTIVE DATE AND CHANGES TO THIS NOTICE**Effective Date.**

This Notice is effective on April 14, 2003.

Changes to this Notice.

We may change the terms of this Notice at any time. If we change this Notice, we may make the new notice terms effective for all PHI that we maintain, including any information created or received prior to issuing the new notice. If we change this Notice, we will post the revised notice on this website. You may also obtain any revised notice by contacting the Privacy Officer.