

Notice of Boundless Policies and Practices to Protect the Privacy of Consumer's Health Information

THIS NOTICE DESCRIBES HOW PSYCHOLOGY AND MEDICAL INFORMATION ABOUT CONSUMERS MAY BE USED AND DISCLOSED AND HOW THIS INFORMATION CAN BE ACCESSED. PLEASE REVIEW IT CAREFULLY

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

Boundless may *use* or *disclose protected health information (PHI)*, for *treatment, payment, and health care operations* purposes with *consent*. To help clarify these terms, here are some definitions:

- A. “*PHI*” refers to information in the clinical record that could identify a consumer.
- B. “*Treatment, Payment, and Health Care Operations*”
 - 1. *Treatment* is when we provide, coordinate or manage consumer's health care and other services related to their health care. An example of treatment would be when we consult with another health care provider.
 - 2. *Payment* is when we obtain reimbursement for consumer's healthcare. Example of payment are when we disclose PHI to a health insurer to obtain reimbursement for consumer's health care or to determine eligibility or coverage.
 - 3. *Health Care Operations* are activities that relate to the performance and operation of our program. Examples of health care operations are quality assessment and improvements activities, business-related matters such as audits and administrative services, and case management and care coordination.

II. Uses and Disclosures Requiring Authorization

- A. We may use or disclose PHI for purposes outside of treatment, payment, and health care operations when appropriate authorization is obtained. An “*authorization*” is written permission above and beyond the general consent that permits only specific disclosures. In those instances when we are asked for information for purpose outside of treatment, payment and health care operations, we will obtain an authorization from the legal guardian before releasing this information.
- B. We will also need to obtain an authorization before releasing any psychotherapy notes. “*Psychotherapy notes*” are notes made about conversation during a private, group, joint, or family counseling session between a consumer and a psychologist, which are kept separate from the rest of the clinical record. These notes are given a greater degree of protection than the PHI.
- C. A legal guardian may revoke all such authorizations (of PHI or psychotherapy notes) at any time, provided each revocation is in writing. An authorization may not be revoked to

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the extent that (1) we have relied on that authorization; or (2) if the authorization was obtained as a condition of obtaining insurance coverage, and the law provides the insurer the right to contest the claim under the policy.

III. Uses and Disclosures with Neither Consent nor Authorization

We may use or disclose PHI without your consent or authorization in the following circumstances.

- A. *Child Abuse*: If, in our professional capacity, we know or suspect that a child under 18 years of age or a mentally retarded, developmentally disabled, or physically impaired child under 21 years of age has suffered or faces a threat of suffering any physical or mental wound, injury, disability, or condition of a nature that reasonably indicates abuse or neglect, we are required by law to immediately report that knowledge or suspicion to the Ohio Public Children Service Agency, or municipal or county peace officer.
- B. *Adult and Domestic Abuse*: If we have reasonable cause to believe that an elder adult is being abused, neglected, or exploited, or is in a condition which is the result of abuse, neglect or exploitation, we are required by law to immediately report such belief to the County Department of Job and Family Services.
- C. *Judicial or Administrative Proceedings*: If a consumer is involved in a court proceeding and a request is made or information about evaluation, diagnosis and treatment and the records thereof, such information is privileged under state law and we will not release this information without written authorization from the consumer or the legal guardian or by a court order. The privilege does not apply when the consumer is being evaluated for a third party or where the evaluation is court order. The legal guardian of the consumer will be informed in advance if this is the case.

