

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.

Catalyst Life Services is required by law to maintain the privacy of your health information and to provide you with notice of its legal duties and privacy practices with respect to your health information. If you have questions about any part of this notice or if you want more information about the privacy practices at Catalyst Life Services, please contact:

Denise Carson
Performance Improvement Director
741 Scholl Road
Mansfield, Ohio 44907
419-756-1717

Effective Date of This Notice: October 1, 2002/Revised April 21, 2010/Revised Sept. 23, 2013/ Revised July 16, 2014/ Revised Jan. 16, 2019/ Revised Sept. 26, 2019

I. How Catalyst Life Services may Use or Disclose Your Health Information

Catalyst Life Services collects health information from you and stores it in a chart and on a computer. This is your medical record. The medical record is the property of Catalyst Life Services, but the information in the medical record belongs to you. Catalyst Life Services protects the privacy of your health information. The law permits Catalyst Life Services to use or disclose your health information for the following purposes:

- 1. Treatment.** Your personal health information will be used by Catalyst Life Services clinicians to assist in the assessment, diagnosis and treatment of the condition for which you have sought services. If you are being seen by more than one clinician at Catalyst Life Services, or are a part of a program for which you will have a treatment team, then those clinicians may consult and discuss with each other information pertaining to your treatment here at Catalyst Life Services. Use of any of your Personal Health Information (PHI) for treatment at Catalyst Life Services is limited to only those staff with a need to know. An example of this type of information sharing would include your counselor discussing your medications with your Psychiatrist. You may request that your information be restricted from specific staff. By Ohio law, Catalyst Life Services can share PHI with any State psychiatric hospital, without obtaining your authorization to do so, should you be admitted to such a hospital. If you are seen for Substance Use Diagnosis treatment, a portion of your health record may also be maintained at Third Street Family Health Services for continuity of care.
- 2. Payment.** PHI cannot be released to any third-party payer without your written authorization. This is Ohio law.
- 3. Regular Health Care Operations.** Catalyst Life Services may disclose your PHI to regulatory, funding and oversight bodies in the course of conducting the ongoing health care operations of the agency. An example of this would be when The Ohio Department of Mental Health & Addiction Services reviews the agency in order for Catalyst Life Services to maintain the necessary certification by the State of Ohio to provide services. They will request to review client records as a part of their review. They will be asked to sign a confidentiality agreement that they will regard all PHI that they review as confidential. Another example would be when Catalyst Life Services conducts an internal quality review, as required by law or accreditation bodies. Designated Catalyst Life Services staff who may not be a member of your treatment team will review your chart to assure that the agency is following all the necessary laws and to monitor that you are receiving quality services. That staff is bound by the agency's confidentiality policy in the use of the information they review. The same rule applies to staff that may be involved in data entry procedures, compiling reports, filing, etc. All staff sign a confidentiality agreement at hiring and staff is limited to what PHI they have access to, based on their job duties. This is both Ohio law and Federal law.
- 4. Information provided to you.** You have the right to review and request copies of your medical record. The actual medical record itself belongs to the agency, but the information in it belongs to you. You will receive information on how to access your medical record during your orientation. There are exceptions, as noted in Ohio law, where Catalyst Life Services can withhold documentation in the file from you. This would be if the clinician feels that in their professional opinion, having that information would be an eminent threat to you. Please see your Client's Rights for further clarification.
- 5. Directory.** Catalyst Life Services does not maintain a directory.
- 6. Notification and communication with family.** Under Ohio law, we will not release any information or communicate with a family member without the written authorization of the client.
- 7. Required by law.** As required by Ohio law, we may use and disclose your health information. An example of this would be if we received a court order signed by a judge to release your records to the court. We would first attempt to obtain an authorization from you to release the requested records, but may be required by law to release them without your authorization. Another example would be if you were to be probated to a State psychiatric hospital. Catalyst Life Services is required by Ohio law to provide the requested PHI to the prosecuting attorney or the Mental Health Board attorney pursuant to these proceedings.
- 8. Public health.** As required by Ohio law, we may disclose your PHI to public health authorities for purposes related to reporting child abuse and/or neglect. An example would be if during a counseling session, you revealed that you had physically, sexually or emotionally abused a child. Your counselor would be required by Ohio law to report that information to the appropriate County Children's Services Board.
- 9. Health oversight activities.** We may disclose your health information to health agencies during the course of audits, investigations, inspections, licensure and other proceedings. Another example would be information used in the yearly compliance audit required by the State of Ohio in which client charts and billings are reviewed. All auditors are required to sign confidentiality agreements that any PHI viewed will remain confidential. This is Ohio law.
- 10. Judicial and administrative proceedings.** We may disclose your health information in the course of any administrative or judicial proceeding upon written order by a judge to do so. An example would be if your counselor were subpoenaed to testify at a trial or hearing involving you. The counselor will first attempt to obtain a written authorization from you to release information in the form of testimony. However, if you decline the authorization, the counselor may be ordered by the judge to answer questions. This is Ohio law.
- 11. Law enforcement.** We may disclose your PHI to law enforcement when complying with a court order signed by a judge directing that such information be provided to law enforcement. Catalyst Life Services will first attempt to obtain a written authorization from you that would allow for the release of the requested records. This is Ohio law.
- 12. Deceased person information.** We may disclose your PHI to coroners, upon written request by the coroner in an effort to determine the cause of death, or executors of the estate, for purposes of settling the estate. An executor must produce a court order declaring them to be the executor of the deceased estate. This is Ohio law.
- 13. Organ donation.** Not applicable to Catalyst Life Services.
- 14. Research.** By Ohio Law, we cannot release any of your personal health information to be included in any research project without the written consent of the client, legal guardian or parent.
- 15. Public safety.** We may disclose your PHI to appropriate persons in order to prevent or lessen a serious and imminent threat to the health or safety of a particular person, a particular structure, or the general public. An example of this would be if you were to tell your psychiatrist that you intended to harm a specific individual and that you had the capability, means and intention to carry that out. The psychiatrist, by Ohio law, is obligated to notify that individual of the threat against them.
- 16. Specialized government functions.** Not applicable to Catalyst Life Services.
- 17. Worker's compensation.** We may disclose your health information as necessary to comply with worker's compensation laws, only with your written authorization. This is Ohio law.
- 18. Continuity of Care.** Ohio law allows disclosure of information to certain hospitals and providers of treatment and health services if the purpose of the exchange is to facilitate continuity of care for a patient. Before information is disclosed, attempts will be made to obtain your consent.
- 19. Marketing.** Disclosures of your PHI for marketing purposes requires your written authorization. This agency does not use PHI in marketing.
- 20. Sale of PHI.** Disclosures of PHI for sale requires your written authorization. This agency does not sell PHI.
- 21. Genetic information.** Genetic information of an individual and their family members may be obtained and shared if pertinent to medications and/or diagnosis.

II. When Catalyst Life Services May Not Use or Disclose Your Health Information

Except as described in this Notice of Privacy Practices, Catalyst Life Services will not use or disclose your health information without your written authorization. If you do authorize Catalyst Life Services to use or disclose your health information for another purpose, you may revoke your authorization in writing at any time.

III. Your Health Information Rights

1. You have the right to request restrictions on certain uses and disclosures of your health information. Catalyst Life Services is not required to agree to the restriction that you requested.
2. You have the right to receive your health information through a reasonable alternative means or at an alternative location.
3. You have the right to inspect and copy your health information.
4. You have a right to request that Catalyst Life Services amend your health information that is incorrect or incomplete. Catalyst Life Services is not required to change your health information and will provide you with information about Catalyst Life Services' denial and how you can disagree with the denial.
5. You have a right to receive an accounting of disclosures of your health information made by Catalyst Life Services, except that Catalyst Life Services does not have to account for the disclosures described in parts 1 (treatment), 2 (payment), 3 (health care operations), 4 (information provided to you), 5 (directory listings) and 6 (certain government functions) of section I of this Notice of Privacy Practices or any disclosures made with your express written authorization.
6. You have a right to a paper copy of this Notice of Privacy Practices.
7. You have the right to opt out of fundraising communications.
8. You have the right to be notified of a breach of PHI.
9. You have the right to prevent PHI from being transmitted to a health care plan if you have paid out of pocket for the service.

If you would like to have a more detailed explanation of these rights or if you would like to exercise one or more of these rights, contact:

Denise Carson
Performance Improvement Director
Catalyst Life Services
741 Scholl Rd.
Mansfield, Ohio, 44907
419-756-1717

IV. Changes to this Notice of Privacy Practices

Catalyst Life Services reserves the right to amend this Notice of Privacy Practices at any time in the future. Until such amendment is made, Catalyst Life Services is required by law to comply with this Notice.

Notice of any revisions will be made available in writing at each agency site.

V. Complaints

Complaints about this Notice of Privacy Practices or how Catalyst Life Services handles your personal health information should be directed to:

Denise Carson
Performance Improvement Director
419-756-1717

Catalyst Life Services will follow the Client's Rights and Grievance procedure when receiving and investigating any complaints related to personal health information. This includes the right to freedom from retaliation or retributions to the individual filing the complaint.

If you are not satisfied with the manner in which this office handles a complaint, you may submit a formal complaint to:

Department of Health and Human Services
Office of Civil Rights
Hubert H. Humphrey Bldg
200 Independence Avenue, S.W.
Room 509F HHH Building
Washington, D.C. 20201
800-368-1019
Hearing Impaired TDD Line 800-537-7697
ORCmail@hhs.gov

You may also address your complaint to one of the regional Offices for Civil Rights. A list of these offices can be found online at www.hhs.gov/ocr/regmail.html