



7400 E Crestline Cir., Suite 118 · Greenwood Village, CO 80111
720.468.0101 · info@coloradocounselingcenter.com

coloradocounselingcenter.com

HIPAA POLICY & NOTICE OF PRIVACY PRACTICES

THIS NOTICE CONTAINS INFORMATION CONCERNING HOW CONFIDENTIAL MENTAL HEALTH TREATMENT INFORMATION CONCERNING YOU MAY BE USED AND DISCLOSED AND HOW YOU CAN OBTAIN ACCESS TO THIS INFORMATION. PLEASE REVIEW IT CAREFULLY AND LET US KNOW ANY QUESTIONS THAT YOU MAY HAVE CONCERNING THIS NOTICE. During the process of providing services to you, Colorado Counseling Center, PLLC ("Colorado Counseling Center" hereafter) will obtain and use mental health and medical information concerning you that is both confidential and privileged. Ordinarily this confidential information will be used in the manner that is described in this statement, and will not be disclosed without your consent, except for the circumstances described in this Notice.

I. USES AND DISCLOSURES OF PROTECTED INFORMATION

A. General Uses and Disclosures Not Requiring the Client's Consent.

Colorado Counseling Center will use and disclose protected health information in the following ways.

1. Treatment. Treatment refers to the provision, coordination, or management of mental health care and related services by one or more health care providers. For example, Colorado Counseling Center therapists and staff involved with your care may use your information to plan your course of treatment and consult with other health care professionals or their staff concerning services needed or provided to you.

2. Payment. Payment refers to the activities undertaken by a health care provider to obtain or provide reimbursement for the provision of health care. For example, Colorado Counseling Center and other health care professionals will use information that identifies you, including information concerning your diagnosis, services provided to you, dates of services, and services needed by you, and may disclose such information to insurance companies and to businesses that review bills for health care services and handle claims for payment of health care benefits in order to obtain payment for services. If you are covered by Medicaid, information may be provided to the State of Colorado's Medicaid program, including but not limited to your treatment, condition, diagnosis, and services received.

3. Health Care Operations. Health Care Operations means activities undertaken by health insurance companies, businesses that administer health plans, and companies that review bills for health care services in order to process claims for health care benefits. These functions include management and administrative activities. For example, such companies may use your health information in monitoring of service quality, staff training and evaluation, medical reviews, legal

services, auditing functions, compliance programs, business planning and accreditation, certification, and licensing and credentialing activities.

4. Contacting the Client. Colorado Counseling Center may contact you to remind you of appointments and to tell you about treatments or other services that might be of benefit to you.

5. Required by Law. Colorado Counseling Center will disclose protected health information when required by law. This includes, but is not limited to: (a) reporting child abuse or neglect to the Department of Human Services or to law enforcement; (b) when court ordered to release information; (c) when there is a legal duty to warn of a threat that a client has made of imminent physical violence, health care professionals are required to notify the potential victim of such a threat, and report it to law enforcement; (d) when a client is imminently dangerous to herself/himself or to others, or is gravely disabled, health care professionals may have a duty to hospitalize the client in order to obtain a 72-hour evaluation of the client; and (e) when required to report a threat to the national security of the United States.

6. Health Oversight Activities. Your confidential, protected health information may be disclosed to health oversight agencies for oversight activities authorized by law and necessary for the oversight of the healthcare system, government health care benefit programs, regulatory programs or determining compliance with program standards.

7. Crimes on the Premises or Observed by Colorado Counseling Center Personnel. Crimes that are observed by Colorado Counseling Center staff, that are directed toward staff, or occur on Colorado Counseling Center premises will be reported to law enforcement.

8. Business Associates. Confidential health care information concerning you provided to insurers or to plans for purposes of payment for services that you receive may be disclosed to business associates. For example, some administrative, clinical, quality assurance, billing, legal, auditing and practice management services may be provided by contracting with outside entities to perform those services. In those situations, protected health information will be provided to those contractors as is needed to perform their contracted tasks. Business associates are required to enter into an agreement maintaining the privacy of the protected health information released to them.

9. Research. Protected health information concerning you may be used with your permission for research purposes if the relevant provisions of the Federal HIPAA Privacy Regulations are followed.

10. Involuntary Clients. Information regarding clients who are being treated involuntarily, pursuant to law, will be shared with other treatment providers, legal entities, third-party payers and others, as necessary to provide the care and management coordination needed in compliance with Colorado law.

11. Family Members. Except for certain minors, incompetent clients, or involuntary clients, protected health information cannot be provided to family members without the client's consent. In situations where family members are present during a discussion with the client, and it can be

reasonably inferred from the circumstances that the client does not object, information may be disclosed in the course of that discussion. However, if the client objects, protected health information will not be disclosed.

12. Emergencies. In life threatening emergencies Colorado Counseling Center staff will disclose information necessary to avoid serious harm or death.

B. Client Release of Information or Authorization. Colorado Counseling Center and other health care professionals may not use or disclose protected health information in any way without a signed release of information or authorization. When you sign a release of information or an authorization, it may later be revoked, provided that the revocation is in writing. The revocation will apply, except to the extent Colorado Counseling Center has already taken action in reliance thereon.

II. YOUR RIGHTS AS A CLIENT

A. Access to Protected Health Information. You have the right to receive a summary of confidential health information concerning you concerning mental health services needed or provided to you. There are some limitations to this right, which will be provided to you at the time of your request, if any such limitation applies. To make a request, ask Colorado Counseling Center staff for the appropriate request form.

B. Amendment of Your Record. You have the right to request that Colorado Counseling Center or your health care professionals amend your protected health information. Colorado Counseling Center is not required to amend the record if it is determined that the record is accurate and complete. There are other exceptions, which will be provided to you at the time of your request, if relevant, along with the appeal process available to you. To make a request, ask Colorado Counseling Center staff for the appropriate request form.

C. Accounting of Disclosures. You have the right to receive an accounting of certain disclosures Colorado Counseling Center has made regarding your protected health information. However, that accounting does not include disclosures that were made for the purpose of treatment, payment, or health care operations. In addition, the accounting does not include disclosures made to you, disclosures made pursuant to a signed Authorization, or disclosures made prior to April 14, 2003. There are other exceptions that will be provided to you, should you request an accounting. To make a request, ask Colorado Counseling Center staff for the appropriate request form.

D. Additional Restrictions. You have the right to request additional restrictions on the use or disclosure of your health information. Colorado Counseling Center does not have to agree to that request, and there are certain limits to any restriction, which will be provided to you at the time of your request. To make a request, ask Colorado Counseling Center staff for the appropriate request form.

E. Alternative Means of Receiving Confidential Communications. You have the right to request that you receive communications of protected health information from Colorado Counseling Center by alternative means or at alternative locations. For example, if you do not want Colorado Counseling Center to mail bills or other materials to your home, you can request that this information be sent to another address. There are limitations to the granting of such requests, which will be provided to you at the time of the request process. To make a request, ask Colorado Counseling Center staff for the appropriate request form.

F. Out-of-Pocket Payment Restriction. If you pay for a service out-of-pocket in full, you have the right to request that Colorado Counseling Center not share information about that service with your health insurer for purposes of payment or health care operations. We will honor that request unless a law requires us to share the information. To make a request, ask Colorado Counseling Center staff for the appropriate request form.

G. Copy of this Notice. You have a right to obtain another copy of this Notice upon request.

III. NOTICE REGARDING USE OF TECHNOLOGY

Colorado Counseling Center uses several technologies to communicate with clients and deliver services. Some of these are fully secure and HIPAA-compliant; others carry privacy risks that you should understand. You have the right to request a different method of communication at any time.

1. Telehealth Video Sessions. Video sessions are conducted through SimplePractice's integrated telehealth platform, which is HIPAA-compliant and encrypted. This is the most secure option for remote sessions.

2. Client Portal Messaging. SimplePractice's client portal offers secure, encrypted messaging between you and your counselor. This is a HIPAA-compliant option for non-urgent communications.

3. Spruce Healthcare — Secure In-App Messaging. Clients who download the Spruce Healthcare app can send and receive secure, encrypted messages with their counselor. This is a HIPAA-compliant option.

4. Spruce Healthcare — Phone and Text. Each Colorado Counseling Center counselor has a Spruce-assigned phone number used for both calls and text messages. While this number is managed through Spruce, calls and text messages transmitted this way travel over standard carrier networks and are **not** end-to-end encrypted. They do not carry the same privacy protections as the secure options described above. If you have concerns about this, please ask your counselor about using a more secure communication method.

5. Email. You may communicate with us by standard email. Unencrypted email is not fully secure and carries some risk that protected health information could be accessed by unintended parties. If you prefer not to use email for sensitive communications, please let us know.

6. Voicemail. Telephone messages left through voicemail may not be confidential if they can be accessed by individuals other than you. Please inform us if you do not want us to leave voicemail messages for you.

7. Fax and U.S. Mail. Communication by fax or U.S. mail may result in unintended disclosure if sent to a wrong number or address, or if mail is opened by another party. Please inform us if you prefer not to receive communications through either of these methods.

Your Choice. Colorado Counseling Center offers secure communication options for all routine contact with your counselor. If you choose to use a less secure method such as standard text messaging or email, you do so with the understanding that those channels carry some privacy risk. Please speak with your counselor or contact our office if you would like to use a different communication method or have questions about your options.

IV. ADDITIONAL INFORMATION

A. Privacy Laws. Colorado Counseling Center is required by State and Federal law to maintain the privacy of protected health information. In addition, Colorado Counseling Center is required by law to provide clients with notice of its legal duties and privacy practices with respect to protected health information. That is the purpose of this Notice.

B. Terms of the Notice and Changes to the Notice. Colorado Counseling Center is required to abide by the terms of this Notice, or any amended Notice that may follow. Colorado Counseling Center reserves the right to change the terms of its Notice and to make the new Notice provisions effective for all protected health information that it maintains. When the Notice is revised, the revised Notice will be posted on Colorado Counseling Center's website and at its service delivery sites, and will be available upon request.

C. Breach Notification. Colorado Counseling Center is required by law to notify you promptly in the event of a breach that may have compromised the privacy or security of your protected health information.

D. Complaints Regarding Privacy Rights. If you believe Colorado Counseling Center has violated your privacy rights, you have the right to complain to Colorado Counseling Center management. Please submit a statement, in writing, addressed to Colorado Counseling Center, PLLC, 7400 E Crestline Cir, Ste 118, Greenwood Village CO, 80111 concerning your complaint and the basis for it. You also have the right to complain to the United States Secretary of Health and Human Services by sending your complaint to the Office of Civil Rights, U.S. Department of Health and Human Services, 200 Independence Avenue, S.W., Room 515F, HHH Bldg., Washington, D.C. 20201, or by calling 1-877-696-6775, or visiting <https://www.hhs.gov/hipaa/filing-a-complaint/index.html>. It is

the policy of Colorado Counseling Center that there will be no retaliation for your filing of such complaints.

E. Additional Information. If you desire additional information about your privacy rights at Colorado Counseling Center, please ask us any questions that you may have.

V. CONFIDENTIALITY OF SUBSTANCE USE DISORDER PATIENT RECORDS

A. The confidentiality of substance use disorder patient records maintained by Colorado Counseling Center is protected by federal law and regulations, including 42 U.S.C. § 290dd-2 and 42 CFR Part 2. Generally, Colorado Counseling Center may not disclose to any outside person that a patient has a substance use disorder, or disclose any information from a substance use disorder patient record, unless:

1. The patient provides written consent;
2. The disclosure is permitted by a court order accompanied by a subpoena; or
3. The disclosure is made to medical personnel in a bona fide medical emergency, or to qualified personnel for the purpose of research, audit, or program evaluation.

B. Colorado Counseling Center will not use or disclose substance use disorder patient records in any civil, criminal, administrative, or legislative proceeding against a patient without either the patient's written consent or both a court order and a subpoena.

C. Violation of these federal laws and regulations is a crime. Suspected violations may be reported to the appropriate authorities in accordance with federal regulations.

D. Federal law and regulations do not protect any information about a crime committed by a patient either at Colorado Counseling Center or against any person who works for Colorado Counseling Center, or about any threat to commit such a crime. Disclosure may be made concerning any threat by a client to commit imminent physical violence against another person to the potential victim and to law enforcement.

E. Federal law and regulations do not protect any information about suspected child abuse or neglect from being reported under state law to appropriate state or local authorities.

VI. EFFECTIVE DATE: THIS NOTICE IS EFFECTIVE MAY 4, 2026.