



Notice of Privacy Practices

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

II. CRISIS SUPPORT SERVICES (CSS) HAS A LEGAL DUTY TO SAFEGUARD YOUR PROTECTED HEALTH INFORMATION (PHI).

Crisis Support Services (CSS) is legally required to protect the privacy of your PHI, which includes information that can be used to identify you which can contain data about your past, present, or future health or condition, the provision of health care services to you, or the payment for such health care. CSS is required to provide you with this Notice about its privacy procedures. This Notice must explain when, why, and how CSS would use and/or disclose your PHI. Use of PHI means when CSS shares, applies, utilizes, examines, or analyzes information within its practice; PHI is disclosed when CSS releases, transfers, gives, or otherwise reveals it to a third party outside its practice. With some exceptions, CSS may not use or disclose more of your PHI than is necessary to accomplish the purpose for which the use or disclosure is made; however, CSS is always legally required to follow the privacy practices described in this Notice.

Please note that CSS reserves the right to change the terms of this Notice and privacy policies at any time as permitted by law. Any changes will apply to PHI already on file. Before CSS makes any important changes to its policies, CSS will immediately change this Notice and post a new copy of it in the office and on the website (**if applicable**). You may also request a copy of this Notice by mail or by e-mail.

III. HOW CSS WILL USE AND DISCLOSE YOUR PHI.

CSS will use and disclose your PHI for many different reasons. Some of the uses or disclosures will require your prior written authorization; others, however, will not. Below you will find the different categories of uses and disclosures, with some examples.

A. Uses and Disclosures Related to Treatment, Payment, or Health Care

Operations Do Not Require Your Prior Written Consent. CSS may use and disclose your PHI without your consent for the following reasons:

1. **For treatment.** CSS can use your PHI to provide you with mental health treatment, including discussing or sharing your PHI with trainees, interns, and supervisors. CSS may disclose your PHI to physicians, psychiatrists, psychologists, and other licensed health care providers who provide you with health care services or are otherwise involved in your care. Example: If a psychiatrist is treating you, your PHI may be disclosed to her/him in order to coordinate your care.
2. **To obtain payment for treatment.** CSS may use and disclose your PHI to bill and collect payment for the treatment and services provided to you. Example: CSS might send your

PHI to your insurance company or health plan in order to get payment for provided health care services. Your PHI could also be provided to business associates, such as billing companies, claims processing companies, and others that process health care claims.

3. **For health care operations.** CSS can disclose your PHI to operate its service. For example, the agency might use your PHI to evaluate the quality of health care services that you received or to evaluate the performance of the health care professional who provided such services to you. CSS may also provide your PHI to our accountants, attorneys, consultants, and others to further agency healthcare operations.
4. **Other disclosures.** CSS may disclose your PHI to others if you need emergency treatment, as long as the agency attempts to get your consent after treatment is rendered, or if CSS tries to obtain consent by you are unable to communicate (for example, if you are unconscious or in severe pain) and CSS representatives believe that you would consent to such treatment if you were able to do so.

B. Certain Other Uses and Disclosures Do Not Require Your Consent. CSS may use and/or disclose your PHI without your consent or authorization for the following reasons (The following list is a compilation of federal and California laws):

1. **When disclosure is required by federal, state, or local law; judicial, board, or administrative proceedings; or, law enforcement.** Example: If law requires reporting information to government agencies or law enforcement personnel about victims of abuse or neglect; or when ordered in a judicial or administrative proceeding.
2. **For public health activities.** Example: CSS may need to report information about you to the county coroner.
3. **For health oversight activities.** Example: CSS may be required to provide information to assist the government in the course of an investigation or inspection of a healthcare organization or provider.
4. **For research purposes.** In certain circumstances, CSS may provide PHI in order to conduct medical research.
5. **To avoid harm.** CSS may provide PHI to law enforcement personnel or persons able to prevent or mitigate a serious threat to the health or safety of a person or the public.
6. **For specific government functions.** Examples: CSS may disclose PHI of military personnel and veterans under certain circumstances. Also, CSS may disclose PHI in the interests of national security, such as protecting the President of the United States or assisting with intelligence operations.
7. **For Workers' Compensation purposes.** CSS may provide PHI in order to comply with Workers' Compensation laws.
8. **Appointment reminders and health related benefits or services.** Examples: CSS may use PHI to provide appointment reminders. CSS may use PHI to give you information about alternative treatment options, or other health care services or benefits CSS offers.

C. Certain Uses and Disclosures Require You to Have the Opportunity to Object.



1. **Disclosures to family, friends, or others.** Your PHI may be shared with a family member, friend, or other individual who you indicate is involved in your care or responsible for the payment for your health care, unless you object in whole or in part. Retroactive consent may be obtained in emergency situations.

D. Other Uses and Disclosures Require Your Prior Written Authorization.

In any other situation not described in Sections IIIA, IIIB, and IIIC above, CSS will request your written authorization before using or disclosing any of your PHI. Even if you have signed an authorization to disclose your PHI, you may later revoke that authorization, in writing, to stop any future uses and disclosures (assuming that CSS has not taken any action subsequent to the original authorization) of your PHI by CSS.

IV. WHAT RIGHTS YOU HAVE REGARDING YOUR PHI

These are your rights with respect to your PHI:

- A. **The Right to See and Get Copies of Your PHI.** In general, you have the right to see your PHI or to get copies of it; however, you must request it in writing. If CSS does not have your PHI, but knows who does, you will be advised on how you can get it. You will receive a response within 30 days of receiving your written request. Under certain circumstances, CSS may feel it must deny your request, but if this is the case, you will be given reasons for the denial in writing and will also explain your right to have the denial reviewed. If you ask for copies of your PHI, you will not be charged more than \$.25 per page. CSS may see fit to provide you with a summary or explanation of the PHI, but only if you agree to it, as well as to the cost, in advance.
- B. **The Right to Choose How CSS Sends Your PHI to You.** It is your right to ask that your PHI be sent to you at an alternate address (for example, sending information to your work address rather than your home address) or by an alternate method (for example, via email instead of by regular mail). CSS is obliged to agree to your request providing that CSS can give you the PHI, in the format you requested, without undue inconvenience. CSS may not require an explanation from you as to the basis of your request as a condition of providing communications on a confidential basis.
- C. **The Right to See and Get Copies of Your PHI.** In most cases, you have the right to look at or get copies of your PHI, but you must make the request in writing. If CSS does not have your PHI but knows who does, CSS will tell you how to get it. CSS will respond to you within 30 days of receiving your written request. In certain situations, CSS may deny your request and will tell you, in writing, the reasons for the denial and explain your right to have the denial reviewed. If you request copies of your PHI, CSS will charge you not more than \$.25 for each page. Instead of providing the PHI you requested, CSS may provide you with a summary or explanation of the PHI as long as you agree to that and to the cost in advance.
- D. **The Right to Get a List of the Disclosures CSS Has Made.** You are entitled to a list of disclosures of your PHI that CSS has made. The list will not include uses or disclosures to which you have already consented, i.e., those for treatment, payment, or health care



operations, sent directly to you, or to your family; neither will the list include disclosures made for national security purposes, to corrections or law enforcement personnel, or disclosures made before April 15, 2003.

Your request for an accounting of disclosures will be answered within 60 days of receiving your request. The list CSS will provide will include disclosures made in the previous six years unless you indicate a shorter period. The list will include the date of the disclosure, to whom PHI was disclosed (including their address, if known), a description of the information disclosed, and the reason for the disclosure. CSS will provide the list to you at no cost, unless you make more than one request in the same year, in which case you will be charged a reasonable sum based on a set fee for each additional request.

- E. **The Right to Correct or Update Your PHI.** If you believe that there is some error in your PHI or that important information has been omitted, it is your right to request that the existing information be corrected or the missing information added. Your request and the reason for the request must be made in writing. You will receive a response within 60 days of my receipt of your request. Your request may be denied, in writing, if CSS finds that: the PHI is (i) correct and complete, (ii) forbidden to be disclosed, (iii) not part of CSS records, or (iv) written by someone not working for CSS. CSS's written denial will state the reasons for the denial and explain your right to file a written statement objecting to the denial. If you do not file one, you still have the right to ask that your request and my denial be attached to any future disclosures of your PHI. If CSS approves your request, CSS will make the change(s) to your PHI, tell you that the changes have been made, and advise all others who need to know about the change(s) to your PHI.
- F. **The Right to Get This Notice by Email.** You have the right to get this notice by email. You have the right to request a paper copy of it, as well.

V. HOW TO COMPLAIN ABOUT MY PRIVACY PRACTICES

If you believe CSS may have violated your privacy rights, or if you object to a decision CSS has made about access to your PHI, you are entitled to file a complaint with the person listed in Section VI below. You may also send a written complaint to the Secretary of the Department of Health and Human Services at 200 Independence Avenue S.W. Washington, D.C. 20201. If you file a complaint about our privacy practices, CSS will take no retaliatory action against you.

VI. PERSON TO CONTACT FOR INFORMATION ABOUT THIS NOTICE OR TO COMPLAIN ABOUT CSS's PRIVACY PRACTICES

If you have any questions about this notice or any complaints about my privacy practices, or would like to know how to file a complaint with the Secretary of the Department of Health and Human Services, please contact: **Narges Dillon, Executive Director, Crisis Support Services of Alameda County, P.O. Box 3120, Oakland, CA 94609**

VII. EFFECTIVE DATE OF THIS NOTICE

This notice went into effect on August 29, 2023.