

Notice of Privacy Practices [NPP]

Effective Date: February 16, 2026



The Behavioral Health Center for Counseling & Learning [BHC] is committed to protecting your privacy. The Notice of Privacy Practices [NPP], or Client Bill of Rights, describes how medical information that identifies or could be used to identify you, known as Protected Health Information [PHI], may be used and disclosed. It also explains our legal duties when it comes to client confidentiality, and your rights regarding the PHI we collect and maintain.

PLEASE READ CAREFULLY! Any client 18 and over must complete this Notice of Privacy Practices [NPP], along with all other Behavioral Health Center office forms themselves, as the identified adult.

Our Legal Duties

BHC and our mental health providers:

- Are federally mandated to maintain the privacy and security of your medical and mental health information, including certain substance use disorder treatment records that are subject to additional protections under federal law (42 CFR Part 2).
- Are required to abide by the terms of this NPP. The medical/mental health information we maintain comes from any of the providers from whom you have received services under the BHC umbrella.
- Reserve the right to change the terms of this NPP. The new provisions will apply to all medical/mental health information we maintain. Should our practices change, we will amend this notice and post it in the client portal. It will also be available in paper form, at the request of the client, and on our website.
- Are required to notify you following certain breaches of unsecured PHI or substance use disorder records when required by law.

This notice is effective as of February 16, 2026 and replaces prior versions.

Special Protections for Substance Use Disorder (SUD) Treatment Records

Some of the information we maintain about you may relate to the diagnosis, treatment, or referral for treatment of a substance use disorder. These “substance use disorder records” may be subject to additional federal confidentiality protections under 42 CFR Part 2.

Because of these extra protections:

- In most cases, BHC may not use or disclose SUD treatment records for treatment, payment, or health care operations without your written consent, except in limited situations permitted by law (for example, certain medical emergencies, audits, or specific court orders that meet strict legal requirements).
- You may choose to give BHC a single written consent that allows us to use and disclose your SUD treatment information for future treatment, payment, and health care operations, including sharing with other treating providers, your health plan, and certain business partners who help us run our practice.
- You have the right to revoke any consent you have given for SUD records at any time, in writing, except to the extent that we have already relied on it.

Substance use disorder records protected by 42 CFR Part 2 generally:

- Cannot be used or disclosed in civil, criminal, administrative, or legislative proceedings against you without your written consent or a specific court order that complies with Part 2.
- Cannot be disclosed to law enforcement for the purpose of investigating or prosecuting you, except as strictly allowed by Part 2.

When both federal and Connecticut laws apply, BHC will follow whichever rule is more protective of your privacy.

Uses & Disclosures Requiring Authorization

The BHC’s policy is to obtain a completed and signed copy of our Release of Information [ROI] authorization for any entity you wish to have access to your Protected Health Information [PHI] / mental health treatment information with us, except where the law allows or requires disclosures without your authorization as described below. You may revoke an ROI or consent at any time, in writing, except to the extent that we have already acted on it.

The BHC will not use or share your PHI other than as described in this NPP, unless you give permission in writing. We may still be required by law to make certain disclosures (for example, mandated abuse reports, health-oversight activities, or specific court orders that meet legal requirements), even if you do not provide an ROI.

The BHC's ROI expires one year from the date it is signed, unless otherwise revoked in writing at an earlier date. A new ROI must be completed annually for any party you would like to have access to your PHI.

Clients who turn 18 during the course of treatment must complete a fresh set of all office forms themselves, including this NPP, along with a Release of Information [ROI] authorization for any parent/adult that will remain involved in their treatment.

BHC does not release psychotherapy treatment notes unless we have exhausted all alternatives and are required to do so by law. If deemed absolutely necessary, a formal request from the Client/Guardian/Legal Representative must be put in writing and submitted to the Clinical Director for review. Psychotherapy notes are treated differently from other mental health information because they contain particularly sensitive information and are the personal notes of the provider that typically are not required or useful for treatment, payment, or healthcare operations. With few exceptions, the federal Privacy Rule requires a covered entity to obtain a client's authorization prior to a disclosure of psychotherapy notes for any reason, including a disclosure for treatment purposes to a health care provider other than the originator of the notes [ref. 45 CFR 164.508(a)(2)].

BHC wishes to respect the privacy of individuals across the lifespan and is therefore very diligent in protecting the PHI of all clients, regardless of age. BHC team members will collaborate with parents and families to support a client's progress towards treatment goals but will always abide by the federal standard of "the minimum necessary to accomplish the intended purpose of the use, disclosure, or request." When working with minor clients, providers will discuss confidentiality expectations and limitations with both the minor and the Parent/Legal Guardian at the start of treatment, including when the minor may have specific rights under Connecticut law to consent to certain services and to control access to those records.

Uses & Disclosures, Permitted Under Law, Without Written Authorization

Clients in treatment at BHC understand that their PHI may be utilized via discussion/exchange of information and/or client records by any team member under the BHC umbrella, including internal BHC administrative team members for general business operations, administrative and billing purposes, coordination of treatment, communications, and evaluation of the quality of services provided.

For coordination of care, treatment planning, business operations, and client billing (general PHI):

- To create a HIPAA-compliant record for you in our Electronic Health Record [EHR] system.
- To evaluate for the best-fit provider and match availability.
- To send you appointment reminders.
- To communicate with you about required office documentation.

For billing, payment of services, and client costs (general PHI):

- To communicate with you/the Responsible Party about insurance coverage and/or payment issues. Clients who have alternative parties responsible for payments will identify this party, in writing on the Informed Consent form, giving BHC permission to communicate with that party for billing purposes.
- To communicate with insurance companies, Connecticut state entities [including Judicial, Social Services/Disability, Victim Services, etc.], and Worker's Compensation entities.

Where substance use disorder records protected by 42 CFR Part 2 are involved, these uses and disclosures for treatment, payment, and health care operations will occur only to the extent allowed by Part 2 and consistent with any written consent you provide.

Other Permitted Disclosures of Your PHI Without Authorization

Certain disclosures of PHI (and, in narrower circumstances, some SUD records) may be made without your authorization when required or permitted by law. These include:

- Duty to protect / duty to warn: When necessary to protect you or others from serious and foreseeable harm or to avert a serious and imminent threat to health or safety, we may disclose information to appropriate persons or authorities.
- Public health and safety: To help with public health and safety issues, such as preventing the spread of disease, reporting certain conditions, or reporting adverse reactions to medications.

- Government and oversight: We may be required to disclose your PHI to the Secretary of Health and Human Services to investigate or determine our compliance with applicable privacy requirements; for health-oversight activities by government agencies that oversee the healthcare system (audits, investigations, inspections); government benefit programs; other government regulatory programs; and civil rights enforcement.
- Abuse, neglect, or domestic violence: To report abuse, neglect, or domestic violence (for example, to the Department of Children and Families when a law requires that we report suspected abuse or neglect).
- Legal statutes, law enforcement, and other government requests: When required by federal, state, or local law; in response to a court order, subpoena, or discovery request (for example, releasing all or specific portions of your BHC health records as formally ordered by a judge as a result of a legal matter); and for certain law-enforcement purposes as allowed by law.
- Workers' Compensation: To comply with workers' compensation laws or support claims.
- If deceased: Limited information may be disclosed to coroners, medical examiners, or funeral directors, as permitted by law.

For SUD treatment records protected by 42 CFR Part 2, these "without authorization" disclosures are more limited than for general PHI. SUD records will only be disclosed without your written consent when specifically allowed by Part 2 (for example, in certain medical emergencies, for specific audits or evaluations, for certain research with appropriate safeguards, or pursuant to a court order that meets Part 2 requirements).

Redisclosure of Information

PHI disclosed by BHC to another person or organization may be subject to redisclosure by that recipient and may no longer be protected by HIPAA.

However, substance use disorder treatment records that are protected by 42 CFR Part 2 and certain records protected by Connecticut law remain subject to those laws even after disclosure. Recipients of Part 2-protected SUD records are prohibited from redisclosing that information in ways that violate Part 2.

Fundraising Communications and Opt-Out (If Applicable)

At this time, BHC does not use client PHI or SUD treatment records for fundraising communications. If this ever changes in the future:

- We will only use limited PHI as allowed by law.
- If SUD treatment information is used for fundraising communications, we will provide a clear and easy way for you to opt out of receiving future fundraising communications that use that information.
- Your decision to opt out will not affect your treatment or benefits.

If BHC begins any fundraising that uses PHI, we will update this NPP accordingly.

Your Rights Regarding Your PHI and SUD Records

You have the right to:

- Request restrictions on certain uses and disclosures of your PHI. We are not required to agree to all requested restrictions, but if we do agree, we will follow them, except in an emergency or as required by law. If you pay out of pocket in full for a specific service and request that we not disclose information about that service to your health plan, we will honor that request unless we are legally required to share it.
- Receive reasonable confidential communication of PHI. BHC relies on electronic correspondence as a primary form of communication. Under the HIPAA Privacy Rule, you have the right to request that we communicate with you in a different or specified format (for example, by mail at a different address, or by phone). If a client initiates an email/text communication with BHC/their clinician/provider, it is assumed (unless you have stated otherwise) that email/text communications are acceptable.
- Request to inspect/receive a paper or electronic copy of your PHI, by written request, with some exceptions (for example, psychotherapy notes, or information compiled for legal proceedings).
- Request an amendment of your medical record if you believe the PHI to be incorrect or incomplete, by written request only, which must indicate a clearly stated reason. BHC reserves the right to deny the request and, in such a case, will send a written explanation for the denial and allow you to respond with a written statement of disagreement, which will then become a part of your medical record.

- Identify someone to act for you (for example, a medical power of attorney that can exercise your rights). BHC requires formal documentation of this in the client file (if you are a legal representative completing this NPP on behalf of a client, ensure the BHC Administrative team has this documentation to upload to the client file).
- Receive a paper copy of this notice, after you have signed it, upon request.
- Request an accounting of BHC's disclosures of your PHI during the six years prior to your request, except for certain disclosures [ref. §164.528].

Additional rights related to substance use disorder (SUD) treatment records:

- You have the right to decide whether to authorize most disclosures of your SUD treatment information outside of those allowed by law.
- You have the right to revoke any written consent for SUD disclosures at any time, in writing, except to the extent BHC has already relied on that consent.
- You have the right to receive this description of how your SUD treatment information is protected, used, and disclosed under 42 CFR Part 2.
- You have additional protections against the use of SUD treatment records in legal proceedings and against certain disclosures to law enforcement, as described above.

General disclaimer: BHC protects the delicacy of your mental health information and reserves the right to deny any request that may compromise the health or safety of the client, provided that any denial will be consistent with your rights under federal and state law (including HIPAA, 42 CFR Part 2, and applicable Connecticut statutes). You may make a further appeal if you disagree with a decision.

How You Can Report a Problem:

If you feel your privacy rights have been violated, you may file a complaint with one of the entities below. There will be no retaliation for filing a complaint.

Andrew Winsor
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P: 203-758-2400
E: awinsor@behavioralhealthctr.com

U.S. Department of Health & Human Services,
Office for Civil Rights
www.hhs.gov/ocr/privacy/hipaa/complaints/