

NOTICE OF PRIVACY PRACTICES

Individual client records at Vona Center for Mental Health contain personal, confidential information called “Protected Health Information” (PHI) under HIPAA (the Health Insurance Portability and Accountability Act). As required by HIPAA privacy regulations, this notice describes how protected health information about Vona Center for Mental Health clients may be used and disclosed, and your rights and responsibilities related to data privacy. The following policies and procedures are based on HIPAA Privacy requirements and applicable Minnesota State Law. Please review it carefully. This Notice was first in effect on April 13, 2003 and was revised on September 19, 2013.

- Vona Center for Mental Health is permitted to use and disclose PHI for treatment, payment and health care operations, as described in the following examples:
 1. For treatment – (example, multidisciplinary team case consultation).
 2. For payment – (examples: determining a client’s insurance eligibility or coverage, obtaining prior authorization from an insurance company for a service, or billing a client’s insurance for a service provided).
 3. For health care operations – (examples: outcomes evaluation or quality assessment activities).
- An “individual” refers to an individual client or to the parent/legal guardian of a child client.
- Vona Center for Mental Health is permitted or required, under specific legal circumstances, to use or disclose PHI without written authorization from the individual (e.g. disclosures to law enforcement, health oversight agencies, a coroner or medical examiner, for public health purposes, specialized government functions or national security and intelligence). If a use or disclosure for any purpose described in the Privacy Regulation is prohibited or materially limited by applicable Minnesota State law, the description of such use or disclosure reflects the more stringent law. Other uses and disclosures will be made only with the individual’s written authorization and the individual may revoke such authorization.
- Individuals may be contacted for appointment reminders.
- Vona Center for Mental Health does not solicit clients currently receiving services from the agency without permission.
- No audio or video recording of a treatment session will be made without client written permission. No one except Vona Center for Mental Health staff or a contracted consultant covered under a business associate agreement / contract will view or listen to a treatment session or recording of a session, or read a verbatim transcript of a session unless the client gives written permission.
- Individuals have the right to view their PHI, with a few exceptions:
 1. If a doctor or licensed provider believes that it will be harmful to the client or others.
 2. Information compiled in anticipation of, or for use in, a civil, criminal or administrative action or proceeding.
- Clients may have the information explained to them by an agency clinician and may request corrections, additions, or amendments to any information in their client chart. Vona Center for Mental Health is not required to agree to make the changes requested. In these cases the client’s request will accompany relevant documents that are released with proper authorization.
- Vona Center for Mental Health is required by law to maintain the privacy of PHI and to provide individuals with notice of its legal duties and Privacy practices with respect to PHI.
- Vona Center for Mental Health is required to abide by the terms of the Notice currently in effect.
- Vona Center for Mental Health reserves the right to change the terms of this Notice. The new Notice provisions will be effective for all PHI that it maintains.
- Any revisions to the Notice will be provided to current and new clients at the individual’s next session, via the agency website or by having copies available at agency sites.
- Complaints may be made to Vona Center for Mental Health and/or to the Department of Health and Human Services Office of Civil Rights, without fear of retaliation by the organization, if an individual believes their privacy rights have been violated. For questions or complaints about data privacy or client privacy rights, they may contact their clinician, program supervisor or the Privacy Officer. The agency grievance / complaint process is described in more detail on the next page. A complaint to the Office of Civil Rights may be filed in writing through mail, fax, email or the OCR Complaint Portal.

- Individuals have the following rights regarding PHI; the extent of and exceptions to these rights are defined in the Privacy Regulation:
 1. The right to request restrictions on certain uses and disclosures of PHI. Vona Center for Mental Health is not required to agree to a requested restriction, however.
 2. The right to receive confidential communications of PHI, as applicable.
 3. The right to inspect and receive a paper or electronic copy of PHI, as applicable.
 4. The right to amend PHI, as applicable.
 5. The right to receive an accounting of disclosures of PHI, as applicable.
 6. The right to obtain a paper copy of the Notice from the covered entity upon request. This right extends to an individual who has agreed to receive the Notice electronically.
 7. The right to restrict certain disclosures of PHI to a health plan if services are paid for out-of-pocket, in full.
 8. The right to be notified if there has been a breach involving your PHI.
- Federal and State laws grant clients of this Agency the right to strict privacy in regard to information about themselves. This means that no information by which a client could be identified will be given by us to anyone else at any time without written consent of the individual, unless specifically required or permitted for treatment, payment, or health care operations purposes by law. Important exceptions are that center staff are required by law to report suspected abuse and neglect of children or vulnerable adults and records may be subpoenaed if a client is involved in a court action.
- Individuals are not required to give any information about themselves; however, refusal to give needed information may hamper service planning. The information that is requested about clients is needed for one or more of the following reasons:
 1. To help us evaluate clients' needs for services and develop a plan to meet those needs for services and develop a plan to meet those needs;
 2. To meet Federal, State, and Local statistical requirements.