

Cordillera Counseling Services, LLC (CCS)

Notice of Privacy Practices

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This Notice of Privacy Practices describes how health information about you may be used and disclosed and how you may access that information. Please review it carefully.

Cordillera Counseling Services, LLC (CCS) is committed to protecting the privacy and confidentiality of your health information. Federal and state laws require healthcare providers to maintain the privacy of Protected Health Information (PHI), provide clients with notice of privacy practices, and follow the terms described in this notice.

This notice explains:

- How CCS may use and disclose your Protected Health Information (PHI)
- Your rights regarding your health information
- CCS's responsibilities for protecting your privacy
- How to contact CCS with questions or concerns regarding privacy practices

Protected Health Information (PHI) includes information that identifies you and relates to your physical health, mental health, healthcare services, or payment for services.

CCS may update this Notice of Privacy Practices from time to time as permitted by law. The most current version will be available upon request, on the Cordillera Counseling Services website, and through the client portal when applicable.

How CCS May Use and Disclose Health Information

CCS may use and disclose Protected Health Information (PHI) for treatment, payment, and health care operations as permitted by law. These uses and disclosures support the provision of care, administrative operations, billing, and professional responsibilities related to services provided by CCS.

Treatment

CCS may use and disclose PHI to provide, coordinate, or manage your treatment and related services.

Examples may include using health information to develop treatment plans, document clinical progress, coordinate care with other healthcare providers, make referrals, or communicate with professionals involved in your care when legally permitted or appropriately authorized.

Payment

CCS may use and disclose PHI as needed to obtain payment for services provided.

Examples may include processing payments, preparing billing statements, maintaining payment records, collecting outstanding balances, preparing invoices, and creating superbills for clients seeking possible out-of-network reimbursement.

Health Care Operations

CCS may use and disclose PHI for practice operations necessary to support quality care and maintain professional, legal, and administrative responsibilities.

Examples may include quality review, clinical consultation, professional training, administrative functions, compliance activities, licensing requirements, business management, record maintenance, and technology or electronic health record operations.

Professional Consultation

To support quality care, CCS may periodically consult with other licensed professionals regarding clinical cases. Whenever possible, identifying information is omitted and consultation occurs using the minimum information necessary to support professional discussion and clinical decision-making.

If consultation would involve disclosure of identifying information to a professional who is not otherwise involved in your treatment, CCS will generally obtain your written authorization before doing so unless disclosure is otherwise permitted or required by law.

Appointment Reminders and Practice Communications

CCS may use or disclose PHI to contact you regarding appointment reminders, scheduling changes, administrative matters, billing-related communication, or information related to services provided by CCS.

Communication may occur through methods you provide or authorize, including telephone, voicemail, email, text messaging, secure client portal messaging, or mail.

Electronic Systems and Telehealth

CCS may use secure electronic systems in the delivery and administration of services. These may include electronic health records, client portals, electronic billing systems, secure messaging platforms, and telehealth technologies.

PHI may be stored, transmitted, or accessed through these systems in accordance with applicable privacy and security laws.

CCS takes reasonable measures to protect electronic information. However, no method of electronic storage or communication can be guaranteed to be completely secure.

Uses and Disclosures Requiring Written Authorization

Except as otherwise permitted or required by law, CCS will obtain your written authorization before using or disclosing your Protected Health Information (PHI) for purposes not described in this Notice.

If you authorize CCS to use or disclose PHI, you may revoke that authorization at any time in writing. Revocation will not affect any use or disclosure that occurred before CCS received the written revocation.

Psychotherapy Notes

CCS may maintain psychotherapy notes as defined by HIPAA. Psychotherapy notes, if maintained, are kept separate from the clinical record and receive additional privacy protections under federal law.

Most uses and disclosures of psychotherapy notes require written authorization, except in limited circumstances permitted or required by law. These may include use by the originating clinician for treatment, certain supervision or training purposes, defense in legal proceedings brought by a client, health oversight activities, disclosures required by law, or situations involving serious and imminent threats to health or safety.

Psychotherapy notes are distinct from the clinical record and generally do not include information such as diagnosis, treatment plan, symptoms, prognosis, progress, session start and stop times, or services provided.

Marketing

CCS will not use or disclose your PHI for marketing purposes without your written authorization, except where permitted by law.

Sale of PHI

CCS does not sell Protected Health Information.

Other Uses and Disclosures

Any other uses or disclosures of PHI not described in this Notice or otherwise permitted or required by law will be made only with your written authorization.

Substance Use Disorder Patient Records Protected by Federal Law

Note: CCS is not a specialized substance use disorder treatment program.

Some substance use disorder treatment records may receive additional confidentiality protections under a federal law known as 42 CFR Part 2. CCS is not a specialized substance use disorder treatment program; however, if CCS creates, receives, or maintains records that are protected by 42 CFR Part 2, CCS will handle those records in accordance with Part 2, HIPAA, Maryland law, and other applicable privacy requirements.

To the extent CCS maintains substance use disorder patient records that are subject to 42 CFR Part 2, CCS will not use or disclose information from those records in civil, criminal, administrative, or legislative investigations or proceedings against you unless you provide written consent or unless a court order and subpoena, or other legal process meeting Part 2 requirements, permits or requires the disclosure.

If Part 2 applies to your records, you have the right to file a complaint with the U.S. Department of Health and Human Services Office for Civil Rights if you believe your Part 2 privacy rights have been violated. Filing a complaint will not affect your treatment, payment, services, or eligibility for future services.

Uses and Disclosures Permitted or Required by Law

While CCS is committed to protecting client privacy, there are circumstances in which CCS may be required or permitted by federal or Maryland law to disclose Protected Health Information (PHI) without written authorization. These disclosures may include, but are not limited to, situations involving safety concerns, mandatory reporting obligations, court orders, health oversight activities, law enforcement requests, or other legal requirements. When disclosure is required or permitted, CCS will limit the information disclosed to what is necessary and appropriate under the circumstances and consistent with applicable law.

Required by Law

CCS may disclose PHI when required to do so by federal, state, or local law.

Safety Concerns and Serious Threats

CCS may disclose PHI when necessary to prevent or reduce a serious and imminent threat to the health or safety of the client, another person, or the public, consistent with applicable law and professional standards.

Abuse, Neglect, or Exploitation

CCS may disclose PHI when required to report suspected abuse, neglect, or exploitation, including suspected child abuse or neglect and suspected abuse, neglect, or exploitation of vulnerable adults, as required by Maryland law.

Public Health Activities

CCS may disclose PHI for public health activities when required or permitted by law, such as reporting certain communicable diseases, injuries, or other public health concerns to authorized public health authorities.

Health Oversight Activities

CCS may disclose PHI to health oversight agencies for activities authorized by law, including audits, investigations, inspections, licensing reviews, professional discipline, or compliance activities.

Judicial and Administrative Proceedings

CCS may disclose PHI in response to a valid court order, subpoena, administrative order, or other lawful process when required or permitted by law. CCS responds only when required or permitted by law and may seek clarification/protection when appropriate.

Law Enforcement

CCS may disclose PHI to law enforcement officials when required or permitted by law, including in response to certain legal processes, court orders, or circumstances involving safety concerns.

Coroners, Medical Examiners, and Funeral Directors

CCS may disclose PHI to coroners, medical examiners, or funeral directors when necessary for them to perform duties authorized by law.

Workers' Compensation

CCS may disclose PHI as necessary to comply with workers' compensation laws or similar programs that provide benefits for work-related injuries or illness.

Specialized Government Functions

CCS may disclose PHI for specialized government functions when authorized by law, including certain military, national security, protective services, or correctional institution activities.

Research

CCS may disclose PHI for research purposes only when permitted by law and when appropriate privacy protections or review procedures are in place.

Family Members, Emergency Contacts, or Others Involved in Care

CCS may disclose relevant information to family members, emergency contacts, or others involved in a client's care or payment for care when the client agrees, does not object when given the opportunity, or when CCS determines that disclosure is in the client's best interest or necessary to address safety concerns, consistent with applicable law.

In emergency situations, CCS may use professional judgment to determine whether disclosure is appropriate to support safety, care coordination, or emergency response.

Personal Representatives and Minor Clients

Unless otherwise prohibited or limited by law, parents, legal guardians, or other legally authorized personal representatives may exercise certain privacy rights on behalf of a client.

When services are provided to a minor client, CCS will follow applicable Maryland and federal law regarding consent, confidentiality, access to records, parent or guardian involvement, and disclosure of information.

In some circumstances, Maryland law allows a minor client to consent to certain mental health services without parent or guardian consent. When this applies, CCS will handle consent, confidentiality, parent or guardian communication, financial responsibility, and record access in accordance with applicable law.

CCS may request custody orders, guardianship documents, parenting plans, or other legal documentation when needed to determine who is legally authorized to make decisions, access information, or communicate with CCS regarding a minor client.

CCS encourages developmentally appropriate communication between minor clients and parents or guardians. However, psychotherapy is often most effective when minor clients have a reasonable degree of privacy to speak openly. CCS may provide parents or guardians with general information regarding treatment progress, attendance, participation, safety concerns, treatment recommendations, and ways to support the client, while not routinely sharing detailed session content unless clinically appropriate, legally authorized, required, or necessary for safety.

CCS does not make custody determinations, parenting recommendations, or legal decisions regarding parental rights. When parents, guardians, or legally authorized representatives disagree about treatment, access to records, or communication with CCS, CCS may require legal documentation, written agreement between authorized parties, or legal guidance before proceeding.

Your Rights Regarding Your Health Information

You have certain rights regarding your Protected Health Information (PHI). Some rights are subject to legal limitations, professional standards, and applicable federal or Maryland law.

Right to Request Restrictions

You may request that CCS limit certain uses or disclosures of your PHI. CCS will consider requests for restrictions, but is not required to agree to all requested restrictions except where required by law.

Right to Restrict Certain Disclosures to Health Plans

If you pay for a healthcare item or service in full out of pocket, you may request that CCS not disclose information about that item or service to a health plan for payment or health care operations purposes. CCS will comply with such requests when required by law.

Right to Request Confidential Communications

You may request that CCS communicate with you in a specific way or at a specific location. For example, you may request that CCS contact you through the client portal, by phone, or at a particular mailing address. CCS will accommodate reasonable requests when possible.

Right to Access Records

With limited exceptions, you have the right to inspect or obtain a copy of PHI maintained by CCS.

Requests for records must be submitted in writing. CCS will respond within the timeframes required by applicable law. CCS may charge reasonable, cost-based fees for copies, mailing, or summaries when permitted by law and agreed upon when required. Psychotherapy notes are generally excluded from the right of access and receive additional privacy protections under federal law.

Right to Request Amendment

You may request that CCS amend information in your record if you believe it is inaccurate or incomplete. Requests for amendment must be submitted in writing. CCS may deny a request under circumstances permitted by law and will provide a written explanation if a request is denied.

Right to an Accounting of Certain Disclosures

You have the right to request a list of certain disclosures CCS has made of your PHI. This accounting generally does not include disclosures made for treatment, payment, or health care operations; disclosures made directly to you; disclosures authorized by you; or other disclosures excluded by law.

You may request an accounting for up to six (6) years before the date of your request, or for a shorter period if preferred.

Right to Receive a Copy of this Notice

You have the right to receive a paper or electronic copy of this Notice of Privacy Practices at any time.

Right to Be Notified Following a Breach

You have the right to be notified if CCS discovers a breach of unsecured PHI that affects you and requires notification under applicable law.

Right to File a Complaint

You have the right to file a complaint if you believe your privacy rights have been violated. You may file a complaint with CCS or with the U.S. Department of Health and Human Services Office for Civil Rights.

Filing a complaint will not affect your treatment, payment, services, or eligibility for future services.

CCS's Privacy Responsibilities

CCS is required by law to protect the privacy and security of your Protected Health Information (PHI).

CCS is responsible for:

- Maintaining the privacy and security of PHI.
- Providing clients with a Notice of Privacy Practices.
- Following the terms of the Notice currently in effect.
- Notifying affected individuals if a breach of unsecured PHI occurs and notification is required by law.
- Limiting uses and disclosures of PHI to those permitted or required by law, or authorized by the client when authorization is required.

CCS may update this Notice from time to time as permitted by law. Any revised Notice will apply to PHI maintained by CCS. The current version will be available upon request, on the Cordillera Counseling Services website, and through the client portal when applicable.

Record Retention & Security

CCS maintains clinical and administrative records in accordance with applicable federal and Maryland law, professional standards, and practice policies.

Records are retained for the period required by law and may be maintained for longer periods when clinically, legally, or administratively appropriate.

Records relating to minor clients may be retained for longer periods as required by applicable law.

When records are no longer required to be maintained, they are destroyed in a manner designed to protect confidentiality and privacy.

CCS takes reasonable administrative, technical, and physical safeguards to protect PHI from unauthorized access, use, disclosure, alteration, or destruction.

No system of recordkeeping, electronic communication, or data storage can be guaranteed to be completely secure. CCS will continue to take reasonable steps to protect privacy consistent with legal and professional obligations.

Questions, Concerns & Complaints

If you have questions about this Notice or about CCS's privacy practices, you may contact:

Cordillera Counseling Services, LLC (CCS)

5570 Sterrett Place, Suite 205-A

Columbia, Maryland 21044

Phone: 443-203-9838

Email: tahmineh@cordilleracounselingservices.com

Clients may file a complaint with CCS if they believe their privacy rights have been violated.

Clients may also file a complaint with the U.S. Department of Health and Human Services Office for Civil Rights.

U.S. Department of Health and Human Services

Office for Civil Rights

<https://www.hhs.gov/ocr/complaints/index.html>

Filing a complaint will not affect your treatment, payment, services, or eligibility for future services.