



NOTICE OF PRIVACY PRACTICES

We respect our clients' confidentiality and only release information about you in accordance with state and federal laws and the NASW Code of Ethics.

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.

This notice describes our policies related to the use of the records of your care at The Cradle. We are required to give you this Notice about (1) the use and disclosure of your health information, (2) our legal responsibilities, and (3) your rights concerning your health information and to abide by the terms of this notice.

You may request a copy of our Notice at any time. For more information about our privacy practices, or for additional information, contact our Privacy Officer, 2049 Ridge Ave., Evanston, IL 60201, (847) 475-5800.

USE AND DISCLOSURE OF PROTECTED HEALTH INFORMATION ("PHI")

Your client file may contain personal information about your health and/or the health of your child(ren). This information may identify you and relates to your past, present or future physical or mental health condition and related health care services and is referred to as Protected Health Information ("PHI"). We use and disclose the *minimum necessary health information* about you for services or treatment, for payment for your services or treatment, and for The Cradle's health care operations.

For Services. Your PHI may be used and disclosed by those who are involved in your care for the purpose of providing, coordinating, or managing your services. This includes consultation with clinical supervisors or other team members. We may disclose PHI to any other consultant only with your authorization.

For Treatment. We use and disclose your health information internally in the course of your treatment at The Cradle. For example, we may give information to another Cradle health care professional for the purpose of referral within The Cradle. If we wish to provide information outside of The Cradle for your treatment by another health or service care provider, we will have you sign an authorization for release of information. Furthermore, an authorization is required for most uses and disclosures of agency case notes.

For Payment. We may use and disclose your health information to obtain payment for services we provide to you as delineated in the Service Agreement. For example, we may need to give your insurance companies or other agencies the minimum necessary information in order for them to pay us for the service we have provided to you.

For Health Care Operations. We may use and disclose your health information within The Cradle as part of our internal health care operations. For example, this could mean

a review of records to assure quality. We may also use your information to tell you about services, educational activities, and programs that we feel might be of interest to you.

For Marketing/Sales. Uses and disclosures of PHI for marketing purposes, and disclosures that constitute a sale of PHI require your authorization.

Verbal Permission. We may use or disclose your information to family members that are directly involved in your receipt of services with your verbal permission.

INFORMATION DISCLOSED WITHOUT YOUR CONSENT

Under Illinois and federal law, information about you may be disclosed without your consent in the following circumstances.

Emergencies. Sufficient information may be shared to address an immediate emergency you are facing.

Judicial and Administrative Proceedings. We may disclose your personal health information in the course of a judicial or administrative proceeding in response to a valid court order or other lawful process, including if you were to make a claim for Workers Compensation.

Public Health Activities. If we felt you were an immediate danger to yourself or others, we may disclose health information about you to the authorities, as well as alert any other person who may be in danger.

Child/Elder Abuse. We may disclose health information about you related to the suspicion of child and/or elder abuse or neglect.

Criminal Activity or Danger to Others. We may disclose health information if a crime is committed on our premises or against our personnel, or if we believe there is someone who is in immediate danger.

National Security, Intelligence Activities, and Protective Services to the President and Others. We may release health information about you to authorized federal officials as authorized by law in order to protect the President or other national or international figures, or in cases of national security.

Health Oversight Activities. We may disclose health information to a health oversight agency for activities authorized by law. These activities might include audits or inspections and are necessary for the government to monitor the health care system and assure compliance with civil rights laws. Regulatory and accrediting organizations may review your case record to ensure compliance with their requirements. The minimum necessary information will be provided in these instances.

Business Associates. The Cradle may disclose the minimum necessary health information to our business associates that perform functions on our behalf or provide us with services if the information is necessary for such functions or services. For example, The Cradle contracts with a financial audit firm to review the finances of The Cradle on a yearly basis. In the process of the audit, they may come in contact with client billing records. All of our business associates sign agreements to protect the privacy of your information and are not allowed to use or disclose any information other than as specified in our contract.

Research. Under certain circumstances, The Cradle may use and disclose health information for research. Before we do so, the project will go through a special approval process that includes a consent form for clients to sign if they are included in the research study. Even without the special approval, however, The Cradle may permit researchers affiliated with The Cradle to look at non-identifying information to help them plan research projects.

Marketing. The Cradle may send you newsletters or information about services we provide in which we feel you might be interested. You may at any time request that your name be removed from our mailing list. We will not disclose any information to a third party for their use in telemarketing, direct mail marketing, or marketing through electronic mail.

Fundraising Activities. The Cradle may use certain client demographic information—such as your name and address—to contact you about fundraising. The Cradle regularly seeks contributions from the general public to support our charitable and educational programs such as free care or reduced care. If you do not wish to be contacted about fundraising, send a written request to the Privacy Officer of The Cradle, 2049 Ridge Ave., Evanston, IL 60201

Scheduling Appointments. The Cradle may use your contact information to contact you and leave messages to schedule or remind you of appointments.

PROHIBITED INFORMATION DISCLOSURE

Subject to limited exceptions, a covered entity or business associate may not use or disclose protected health information including reproductive health care information for any of the following activities:

- To conduct a criminal, civil, or administrative investigation into any person for the mere act of seeking, obtaining, providing, or facilitating reproductive health care;
- To impose criminal, civil, or administrative liability on any person for the mere act of seeking, obtaining, providing, or facilitating reproductive health care; or
- To identify any person for any purpose set forth in the foregoing.

Any third party requesting protected health care or reproductive health care information will be required to provide an attestation verifying the requested PHI is not for prohibited purposes listed above.

YOUR RIGHTS REGARDING YOUR HEALTH INFORMATION:

Right to Inspect and Copy. You have the right to look at or get copies of your Cradle health information, with limited exceptions. Your request must be in writing. If you request a copy of the information, a reasonable charge may be made for the costs incurred. Children 12 and over must consent to release of their own health information.

Right to Amend. You have the right to request that we amend your Cradle health information. Your request must be in writing, and it must explain why the information should be amended. We have the right to deny your request under certain circumstances.

Right to an Accounting of Disclosures. You have the right to receive a list of instances in which we have disclosed your health information for a purpose other than treatment, payment, or health care operations. To request an accounting of disclosures, you must submit your request in writing to the Privacy Officer. Such accountings are available for disclosures beginning April 14, 2003, and remain available for six years after the last date of service at The Cradle.

Right to Notification. You have the right to or will receive notifications of breaches of his or her unsecured PHI.

Right to Request Restrictions. You have the right to restrict certain disclosures of Protected Health Information to a health plan when you pay out of pocket in full for the healthcare item or service. While you are in treatment, a written request for the restriction should be made with your therapist. To request a restriction after therapy is completed, you must make your written request to the Privacy Officer of The Cradle.

Right to Request Confidential Communications. You have the right to request that we communicate with you about health matters in a certain way or at a certain location. For example, you may ask that we contact you only by mail or at work. You must make this request in writing and it must specify the alternative means or location that you would like us to use to provide you information about your health care. We will make every attempt to accommodate reasonable requests.

Right to Obtain a Paper Copy of this Notice. You have the right to receive a paper copy of this notice and any amended notice upon request. Copies will be available at the reception desk or waiting areas of The Cradle.

Any other uses and disclosures not set out in the information above will be made *only* with your written authorization. You may revoke a written authorization for release of information at any time. The revocation must be in writing and will become effective when it has been received by The Cradle, and will only be for disclosures not already completed.

We reserve the right to change our privacy practices provided such changes are permitted by applicable law. Before the effective date of a material change, however, we will change this Notice and make a new Notice available to you at the reception desk or waiting areas at The Cradle and on our web site.

QUESTIONS AND COMPLAINTS

If you believe your privacy rights have been violated, you may file a complaint with us, or you may file a complaint with the U. S. Department of Health & Human Services. To obtain additional information, or to file a complaint with us, contact the Privacy Officer at (847) 475-5800. **We will not retaliate in any way if you choose to file a complaint.**

Effective 4/14/2003; update effective 8/1/2024.