



Notice of Privacy Practices

Effective Date: 11/24/2025

This Notice describes how medical, health, behavioral health, supportive housing/residential, community support, and social rehabilitation–related information about you may be used and disclosed and how you can get access to this information. Please review it carefully.

We understand that health information about you is personal, and we are committed to protecting that information. Your record of care and services is created to help us provide you with quality care, as well as to meet legal requirements.

1. Who We Are

BHcare provides comprehensive care/services across multiple programs including, but not limited to:

- Outpatient/clinic services
- Supportive housing and residential programs
- Domestic violence services
- Social rehabilitation services
- Employment services
- Community support services

2. Information Covered by This Notice

This Notice applies to both Protected Health Information (PHI) and Personally Identifying Information (PII), which includes any data that can identify you, directly or indirectly, including:

- Personal details (name, address, phone, DOB)
- Health or counseling information
- Case notes, treatment plans, medication records
- Supportive housing information

3. Our Legal Obligations

BHcare is required by law to:

- Maintain the privacy and security of your information
- Provide you with this Notice describing our privacy practices
- Follow the terms of this Notice as currently in effect
- Notify you promptly if a breach occurs that may have compromised your privacy

BHcare complies with:

- HIPAA (45 CFR Parts 160 & 164)
- 42 CFR Part 2
- Violence Against Women Act (VAWA) (34 U.S.C. §12291(b)(2))
- Family Violence Prevention and Services Act (FVPSA) (42 U.S.C. §10406(c)(5); 45 C.F.R. Parts 1370.4(d), 1370.30)
- Connecticut General Statutes §52-146k
- CT mental health confidentiality laws (C.G.S. §17a-540–§17a-548)
- HIV confidentiality laws (C.G.S. §19a-581–§19a-583)
- Relevant state and accreditation standards

When laws differ, BHcare applies the standard that provides the strongest privacy protection.

BHcare is committed to:

- Limiting staff access to only the minimum information needed

- Limiting all disclosures to the minimum necessary
- Promptly notifying you of any breach that may compromise your privacy

4. Understanding HIPAA

The Health Insurance Portability and Accountability Act (HIPAA) is a federal law that establishes:

- Standards for the privacy, security, and confidentiality of personal health information.
- Rules governing how health and human service providers may use and disclose that information.
- Rights for individuals to access, review, and correct their records and to control most disclosures of their information.

BHcare operates as a HIPAA-covered entity and applies HIPAA protections across all programs. All employees, contractors, students, and volunteers receive confidentiality training and must protect your privacy.

BHcare requires Business Associates (auditors, consultants, vendors, funders performing oversight) to sign agreements ensuring they comply with privacy laws.

5. Special Protections for Sensitive Services

BHcare recognizes that certain types of information require heightened confidentiality due to legal protections and the potential for harm if disclosed. This includes information related to:

- Mental health treatment
- Substance use disorder services
- HIV/AIDS status

The additional protections for these services are as follows:

- **CT General Statutes §17a-540 – §17a-548:** Confidentiality of mental health treatment records for individuals receiving services from licensed programs
- **HIPAA (45 CFR Part 164):** Requires privacy of individually identifiable health information
- **42 CFR Part 2:** Protects patient records in federally assisted substance use disorder programs; prohibits disclosure without written consent, except in emergencies or as otherwise legally required
- **CT General Statutes §19a-581 – §19a-583:** Requires consent for release of HIV-related information; limits use and disclosure to specific purposes
- **VAWA (34 U.S.C. §12291(b)(2)) and FVPSA (42 U.S.C. §10406(c)(5)):** Prohibit disclosure of personally identifying information without written consent, except when required by law or court order

6. How We May Use and Disclose Your Information

We may use and disclose information about you only as permitted by law and program policy. The following categories describe some of the different ways that we may use or disclose your PHI/PII without your prior authorization. Even if not specifically listed below, BHcare may use and disclose your PHI/PII as permitted or required by law, or as authorized by you:

a. *Treatment and Service Coordination*

We may use and share information as needed to provide and coordinate and/or monitor your care internally and to support our health care operations including, but not limited to, conducting clinical case reviews, critical incident reviews, chart audits, and case consultation.

b. *Payment*

If services require billing we may use information (including PHI/PII) to process billing payments, verify eligibility, or comply with funder contracts.

c. *Health Care Operations, Quality, and Compliance*

BHcare's internal quality improvement, compliance, and administrative staff may access information as necessary to perform:

- Quality assurance and program evaluation;
- Compliance and regulatory monitoring;
- Internal audits and risk management;
- Staff supervision and training.

Access is limited to the minimum necessary information. These staff are bound by confidentiality agreements and federal and state privacy law.

If information is shared with auditors, funders, or oversight entities (when permitted by law), BHcare does so only under Business Associate Agreements (BAAs), which require those entities to:

- Protect your information according to HIPAA's Privacy and Security Rules (45 C.F.R. Parts 160 & 164);
- Use the information only for authorized purposes; and
- Safeguard and return or destroy the information once their review is complete.

d. *Appointment Reminders or Care Coordination*

We may contact you for appointment reminders, follow-up, or coordination of services using only contact methods you have approved.

e. *Public Health Activities*

We may disclose your PHI or PII to a public health authority that is authorized by law to collect or receive such information for the purpose(s) of:

- Preventing or controlling disease, injury, or disability
- Reporting deaths
- Reporting child or adult abuse or neglect
- Notifying individuals of recalls of products
- Notifying a person who may have been exposed to a disease or may be at risk of contracting or spreading a disease/condition

7. Duty to Warn and Protect

Under Connecticut law and ethical standards, BHcare staff have a "duty to warn and protect" when there is a clear, imminent risk of serious harm to you or others.

In such cases, BHcare may disclose limited information to:

- The identified potential victim(s);
- Law enforcement; or
- Other persons necessary to prevent harm

This exception is narrowly applied and used only when required to protect life or safety.

All disclosures under this duty are limited to what is necessary to prevent foreseeable harm and are documented in your record.

8. Other Disclosures Permitted or Required by Law

We may use or disclose your information without written authorization only in limited circumstances:

a. *Court Orders or Legal Requirements*

If a court of competent jurisdiction issues a valid order, we may be required to disclose limited information. We will make every effort to notify you and protect your confidentiality to the fullest extent possible. Only the minimum necessary information is disclosed.

b. *Mandatory Reporting*

BHcare staff are mandated reporters under Connecticut law and must report suspected abuse or neglect of a child, elder, or person with a disability.

c. *Public Health or Safety Emergencies*

We may disclose information to appropriate authorities if necessary to prevent or respond to a serious threat to health or safety.

d. *Oversight and Audit Activities*

As noted above, information shared with oversight agencies (for audits, compliance monitoring, or evaluation) is covered by Business Associate Agreements that bind those entities to maintain full HIPAA compliance.

e. *De-identified or Aggregate Information*

We may use de-identified data for research, program evaluation, or statistical purposes, when permitted by law. No identifying information will be included.

9. Information Sharing with Community Partners

- BHcare may share aggregate, de-identified data with community partners for purposes such as:
 - Program evaluation and research
 - Training, quality improvement, or reporting requirements
- Personally identifying information (PII) is never shared with community partners without your explicit, time-limited, written consent, except where required by law
- Co-located partners at BHcare sites may work collaboratively, but do not share identifying information between agencies without your express written consent

10. Your Privacy Rights

You have the right to:

- **Inspect and Copy** your information within the limits allowed by law.
- **Request Amendments** to correct inaccuracies.
- **Request Restrictions** on certain uses or disclosures.
- **Request Confidential Communications**, such as alternative contact methods.
- **Receive an Accounting of Disclosures** not related to treatment, payment, or operations.
- **Receive a Paper Copy** of this Notice at any time.

To exercise these rights, contact the BHcare Privacy Officer (see Section 12).

11. How We Protect Your Information

BHcare uses multiple safeguards to protect your information:

- *Administrative safeguards*: staff training, confidentiality agreements, and policies.
- *Technical safeguards*: password-protected systems, secure servers, encrypted email.
- *Physical safeguards*: locked files, restricted access areas, controlled visitor policies.

All internal access is logged and monitored. Unauthorized access or disclosure is investigated and, if necessary, reported as a HIPAA breach to affected individuals and authorities.

BHcare is committed to always protecting your privacy and confidentiality. We will not release or disclose your information without one of the following:

- Your valid, time-limited, written release or consent;
- A valid court order, subpoena, or other legal mandate
- A legally recognized exception under federal or state law (e.g., duty to warn, mandatory reporting)

12. Filing a Complaint or Obtaining More Information

If you have questions or believe your privacy rights have been violated, you may contact:

BHcare Privacy Officer

Brandi Sabato, MS, LPC, Director of Compliance & Privacy Officer

(203) 800-7130

complyline@bhcare.org

or

U.S. Department of Health and Human Services, Office for Civil Rights (OCR)

Toll-Free: 1-800-368-1019

Website: <https://www.hhs.gov/ocr>

You will not face retaliation for filing a complaint.

13. Acknowledgment of Receipt

I acknowledge that I have received and had the opportunity to review BHcare's Notice of Privacy Practices.

Client Name: _____

Signature: _____ **Date:** _____

Guardian Name: _____

Signature: _____ **Date:** _____

Staff Name/Title: _____

Signature: _____ **Date:** _____

14. Alternate Formats

This Notice is available in alternative formats (other languages, large print, Braille) upon request. Assistance will be provided free of charge.