Notice of Practice Policies and Practices to Protect the Privacy of Patients' Health Information

THIS NOTICE DESCRIBES HOW PSYCHOLOGICAL AND MEDICAL INFORMATION ABOUT YOU MAY BE USED AND DISCLOSED AND HOW YOU CAN GET ACCESS TO THIS INFORMATION. PLEASE REVIEW IT CAREFULLY.

For the purpose of this document, Abundance of Love and Wealth, LLC will be referred to as ALW Counseling and Coaching

I. Uses and Disclosures for Treatment, Payment, and Health Care Operations

ALW Counseling and Coaching , may *use* or *disclose* your *Protected Health Information* (*PHI*) for the purposes of *treatment, payment, and health care operations* with your *consent*. The following definitions clarify these terms:

"***PHI****"* refers to information in your patient record that could identify you. ***"Treatment, Payment and Health Care Operations****":*

Treatment is when ALW Counseling and Coaching provides, coordinates or manages your health care and other services related to your health care.

Payment is when ALW Counseling and Coaching obtains reimbursement for your health care. Examples of payment are when your PHI is disclosed to your health insurer to obtain reimbursement for your health care or to determine eligibility or coverage.

Health Care Operations are activities that relate to the performance and operation of this business. Examples of health care operations are quality assessment and improvement activities, business-related matters such as audits and administrative services, and care coordination.

"***Use***" applies only to activities such as sharing, applying, utilizing, examining, and analyzing information that identifies you.

*"****Disclosure***" applies to activities outside of this business such as releasing, transferring, or providing access to information about you to other parties.

II. Uses and Disclosures Requiring Authorization

ALW Counseling and Coaching may use or disclose PHI for purposes outside of treatment, payment, and health care operations when your appropriate authorization is obtained. An "*authorization"* is written permission above and beyond the general consent that permits only specific disclosures. In those instances when information is sought for purposes outside of treatment, payment and health care operations, an authorization will be obtained from you before releasing this information. An authorization is also necessary before releasing your psychotherapy notes. *"Psychotherapy notes"* are notes made about conversations during a private, group, joint, or family counseling session, which are kept separate from the rest of your patient record. These notes are given a greater degree of protection than PHI.

You may revoke all such authorizations (of PHI or psychotherapy notes) at any time, provided each revocation is in writing. You may not revoke an authorization to the extent that (1) ALW Counseling and Coaching has relied on that authorization or (2) if the authorization was obtained as a condition of obtaining insurance coverage and the law provides the insurer the right to contest the claim under the policy.

III. Uses and Disclosures with Neither Consent nor Authorization

ALW Counseling and Coaching may use or disclose PHI without your consent or authorization in the following circumstances:

- **Child Abuse:** If ALW Counseling and Coaching knows, or has reasonable cause to suspect, that a child is abused, abandoned, or neglected by a parent, legal custodian, caregiver or other person responsible for the child's welfare, the law requires that ALW Counseling and Coaching report such knowledge or suspicion to the Florida Department of Children and Families.

- **Adult and Domestic Abuse:** If ALW Counseling and Coaching knows, or has reasonable cause to suspect, that a vulnerable adult (disabled or elderly) has been or is being abused, neglected, or exploited, ALW Counseling and Coaching is required by law to immediately report such knowledge or suspicion to the Florida Abuse Hotline.

- **Health Oversight:** If a complaint is filed against ALW Counseling and Coaching with the Florida Department of Health or other regulating board, the Department has the authority to subpoena confidential mental health information from ALW Counseling and Coaching relevant to that complaint.

- **Judicial or Administrative Proceedings:** If you are involved in a court proceeding and a request is made for information about your diagnosis or treatment and the records thereof, such information is privileged under state law, and ALW Counseling and Coaching will not release information without the written authorization of you or your legal representative, or a subpoena of which you have been properly notified and you have failed to inform ALW Counseling and Coaching that you are opposing the subpoena or a court order. The privilege does not apply when you are being evaluated for a third party or where the evaluation is court ordered. You will be informed in advance if this is the case.

- **Serious Threat to Health or Safety:** When you present a clear and immediate probability of physical harm to yourself, to other individuals, or to society, ALW Counseling and Coaching may communicate relevant information concerning this to the potential victim, appropriate family member, law enforcement, or other appropriate authorities.

- **Worker's Compensation:** If you file a worker's compensation claim, ALW Counseling and Coaching must, upon request of your employer, the insurance carrier, an authorized qualified rehabilitation provider, or the attorney for the employer or insurance carrier, furnish your relevant records to those persons.

IV. Patient's Rights and ALW Counseling and Coaching Responsibilities Patient's Rights:

- *Right to Request Restrictions* – You have the right to request restrictions on certain uses and disclosures of protected health information about you. However, ALW Counseling and Coaching is not required to agree to a restriction you request.

- *Right to Receive Confidential Communications by Alternative Means and at Alternative Locations* – You have the right to request and receive confidential communications of PHI by alternative means and at alternative locations. (For example, you may not want a family member to know you are receiving services. Upon your request, bills will be sent to another address.)

- *Right to Inspect and Copy* – You have the right to inspect or obtain a copy (or both) of PHI in ALW Counseling and Coaching mental health and billing records used to make decisions about you for as long as the PHI is maintained in the record. At your request, ALW Counseling and Coaching will discuss with you the details of the request process.

- *Right to Amend* – You have the right to request an amendment of PHI for as long as the PHI is maintained in the record. Your request may be denied. At your request, ALW Counseling and Coaching will discuss with you the details of the amendment process.

- *Right to an Accounting* – You generally have the right to receive an accounting of disclosures of PHI regarding you. At your request, ALW Counseling and Coaching will discuss with you the details of the accounting process.

- *Right to a Paper Copy* – You have the right to obtain a paper copy of the notice from ALW Counseling and Coaching upon request, even if you have agreed to receive the notice electronically.

ALW Counseling and Coaching Responsibilities:

- ALW Counseling and Coaching is required by law to maintain the privacy of PHI and to provide you with a notice of its legal duties and privacy practices with respect to PHI.

- ALW Counseling and Coaching reserves the right to change the privacy policies and practices described in this notice. Unless ALW Counseling and Coaching notifies you of such changes, however, it is required to abide by the terms currently in effect.

- If ALW Counseling and Coaching revises its policies and procedures; it will provide you with a revised notice which will be available in all its offices.

V. Complaints
If you are concerned that your privacy rights have been violated or if you disagree with a decision that has made about access to your records, please feel free to discuss your concerns with your therapist.

You may also send a written complaint to the Secretary of the U.S. Department of Health and Human Services. I can provide you with the appropriate address upon request.

VI. Social Media Policy
ALW Counseling and Coaching may have a presence on Facebook, Twitter, LinkedIn, Google, Health Grades or any other type of social media. If you take action on any of these platforms including but not limited to "liking", sharing, or posting reviews you are taking it upon your own will to disclose the possibility that you have received or are receiving services from ALW Counseling and Coaching. ALW Counseling and Coaching will not be held liable for any such disclosures by current or past clients and/or their families.

Additionally, ALW Counseling and Coaching and the individuals employed by ALW Counseling and Coaching may have personal social media pages on different platforms and will not interact with current or past clients via social media in order to maintain client confidentiality and proper client/provider boundaries. In order to uphold proper professional boundaries and meet ethical guidelines it is possible that staff may block social accounts that cross over in (including but not limited to) community groups, sales pages, and that have attempted to directly contact staff via any means of social media communication.

This policy includes responding to online reviews. Practice response to reviews can implicate participation in services with ALW Counseling and Coaching and may be seen as a breach of confidentiality. If you have a concern about any interaction or treatment by any staff at ALW Counseling and Coaching we urge you to discuss this directly with ALW Counseling and Coaching in order to resolve your concerns in an amicable fashion. We want you to feel heard and never to feel disregarded by any of our providers or staff.

VII. Previous Client Relationships and Ethical Conflicts

ALW Counseling and Coaching follows the guidelines of the National Association of Social workers code of ethics. If an individual seeking counseling from ALW Counseling and Coaching has been a direct client of the specific therapist in another agency they will be referred on to another therapist. We do this to maintain ethical client/therapist relationships and avoid what is called a "dual relationships".

If the provider or client is unaware of the prior relationship and it is later discovered they have been a previous client; the client will then be appropriately referred on to another provider. No party shall be held responsible if the previous client relationship is later discovered and there was no malice or direct intent to mislead.

If during the course of treatment an ethical conflict arises it is the duty of the provider to discuss the ethical conflict, implications, potential harm, seek consult, and provide referral as necessary.

VIII. Protected Communication Policy

ALW Counseling and Coaching communicates information through only secure methods. These protected communication methods include telephone, fax, and secure patient portals.

We do not communicate via text message or email. If you take it upon yourself to message us using our inquiry email system you are acknowledging the risks associated with communicating via unsecured email. We cannot be held responsible for information disclosed via email communication.

IX. Effective Date and Changes to Privacy Policy

This notice will go into effect on December 15, 2015. Updated October 13, 2017. Updated June 05, 2023. Updated May 22, 2025

ALW Counseling and Coaching reserves the right to change the terms of this notice and to make the new notice provisions effective for all PHI that it maintains. ALW Counseling and Coaching will provide you with a revised notice available in office or electronically.