

Sonoma Recovery Services LLC

Olympia House

Notice of Privacy Practices

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

Notice of Privacy Practices for Substance Use Disorder Records and Other Health Information:

This notice explains how we may use and disclose medical and substance use disorder (SUD) related information about you and how you can access that information. It describes your rights and our obligations under the Health Insurance Portability and Accountability Act of 1996 (HIPAA), applicable California law, and, if applicable, the federal confidentiality requirements governing SUD records at 42 C.F.R. Part 2. Nothing in this Notice expands your rights or our obligations beyond what applicable law requires.

If federal SUD confidentiality regulations (42 C.F.R. Part 2) apply to certain records we create or receive, we will use and disclose those records only as permitted by Part 2. When Part 2 does not apply to a particular record, we will use and disclose that record in accordance with HIPAA and applicable state law.

Our Duties:

We are required by law to maintain the privacy of your protected health information, to provide you with this Notice of our legal duties and privacy practices, to follow the terms of the Notice currently in effect, and to notify you following a breach of unsecured protected health information.

How We May Use and Disclose Your Information

Treatment, Payment, and Health Care Operations (TPO):

We use and disclose health information for treatment, payment, and health care operations as permitted by HIPAA (Examples: sharing information with your other providers, such as outpatient therapist, PCP, or psychiatrist to coordinate your care (treatment); submitting clinical documentation to support authorization requests and submitting claims to your health plan (payment); and activities like quality improvement, audits, or care coordination (health care operations)). If federal SUD confidentiality regulations (42 C.F.R. Part 2) apply to certain records, we will obtain any authorization required by those regulations (including, where permitted, a single authorization for future TPO uses and disclosures until revoked). When Part 2 records are disclosed under a valid TPO authorization to a HIPAA covered entity or business associate, that recipient may use and redisclose the records in accordance with HIPAA, except for use or disclosure in legal proceedings against the patient without the patient's consent or a qualifying court order. If Part 2 does not apply to a particular record, we may use and disclose that record for TPO without your authorization as permitted by HIPAA.

Uses and Disclosures Requiring Your Authorization:

We will obtain your written (including electronic) authorization before using or disclosing your information for purposes not described in this Notice or otherwise permitted by law. We accept authorizations submitted by you or on your behalf if they clearly reflect your intent and meet applicable legal requirements.

In particular, we will obtain your authorization before using or disclosing:

1. psychotherapy notes (with limited exceptions), and if Part 2 applies, SUD counseling notes as defined under 42 C.F.R. Part 2;
2. marketing communications that require authorization; and
3. any sale of protected health information (PHI). We do not and will not sell PHI. If our policy were ever to change, we would first revise this Notice and obtain your authorization as required by HIPAA.

You may revoke an authorization at any time in writing, except to the extent we have already relied on it.

Important Note:

Certain notes a counselor or clinician keeps voluntarily, separate from your medical record (HIPAA psychotherapy notes and, if Part 2 applies, SUD counseling notes) require a specific authorization; we will not disclose them without it, except as permitted by law. Ordinary progress or case management notes in your medical record are not psychotherapy notes or SUD counseling notes.

Uses and Disclosures Without Your Authorization:

If Part 2 applies to certain records, we may make disclosures without your authorization only as permitted by Part 2, including:

1. To qualified service organizations, business associates, or other lawful holders that provide services to Sonoma Recovery Services LLC (such as billing, data processing, laboratory, or health information technology services), as permitted by federal law.
2. For purposes of research, audit, or program evaluation, in accordance with applicable federal confidentiality and privacy safeguards.
3. To report a crime committed on the premises of Sonoma Recovery Services LLC or against program personnel, to the extent permitted by law.
4. To appropriate authorities to report suspected child abuse or neglect, as required or permitted by law.
5. To medical or other appropriate authorities to address a medical emergency or a serious and imminent threat to the health or safety of the patient or others, as permitted by federal regulations.
6. As authorized by a court order

Other HIPAA-Permitted Disclosures Without Authorization (when Part 2 does not apply):

We may also use or disclose health information without authorization as permitted by HIPAA and California law, for example: when required by law; for public health reporting; to health oversight agencies (e.g., audits, inspections, licensure); for certain law enforcement purposes; to avert a serious

threat to health or safety; for specialized government functions; and as otherwise described in 45 CFR 164.512.

Lawsuits and Legal Proceedings:

We may disclose information in response to a court or administrative order, and, where required, a subpoena or similar legal process. If Part 2 applies to certain records, we will not use or disclose those records in legal proceedings against a patient without the patient’s written consent or a court order (together with a subpoena or similar legal mandate), subject to limited exceptions.

Your Rights:

Right to Request Restrictions: Under HIPAA, you have the right to request restrictions on certain uses and disclosures of your health information. Sonoma Recovery Services LLC is not required to agree to most requested restrictions. However, if we do agree to a restriction, we will comply with it except as necessary to provide emergency medical treatment or as otherwise expressly permitted under applicable federal law governing the confidentiality of substance use disorder treatment records.

Right to Pay Out-of-Pocket and Restrict to a Health Plan:

We are required to agree to a request to restrict disclosure of health information to a health plan if you have paid for the service in full out of pocket and the disclosure is for payment or health care operations and is not otherwise required by law.

Right to Confidential Communications:

You have the right to request that we communicate with you about your health information by alternative means or at an alternative location. We will accommodate reasonable requests and will not require you to provide an explanation.

Right to Access Records:

You have the right to inspect and obtain a copy of your health information maintained by Sonoma Recovery Services LLC, with certain limited exceptions, such as psychotherapy notes and information compiled for use in legal proceedings, as permitted by law.

Right to Amendment:

You have the right, with some exceptions, to request an amendment of health information maintained in our records.

Right to Accounting of Disclosures:

You may request an accounting of certain disclosures we made in the six years prior to your request, excluding disclosures for treatment, payment, and health care operations and other HIPAA-excluded categories. If Part 2 applies to certain records, you may have an additional right to an accounting of disclosures made with your consent for up to three years under the Part 2 Final Rule.

Right to Paper Copy:

You have the right to receive a paper copy of this Notice of Privacy Practices upon request, even if you agreed to receive it electronically.

Breach Notification:

We will notify you following a breach of unsecured protected health information as required by HIPAA. If Part 2 applies to certain records, we will also follow any applicable Part 2 breach reporting requirements.

AI-Assisted Clinical Documentation:

We may use AI-assisted clinical documentation tools to support facility staff in the preparation and review of records. We will not audio or video record individual therapy or group sessions for the purpose of creating AI-assisted transcripts or summaries unless you provide separate, specific written consent. Any vendor providing AI-assisted services must sign a Business Associate Agreement and may access only the minimum necessary information to perform its functions, as permitted by law.

Changes to This Notice:

We may change our privacy practices and the terms of this Notice at any time, as permitted by law. Any changes will apply to all information we maintain, including information created or received before the change. If we make a material change, we will revise this Notice and make it available upon request and on our website.

COMPLAINTS AND QUESTIONS:

If you have questions about this Notice of Privacy Practices or your privacy rights, you may contact our Privacy Officers:

Christopher Spaulding
Phone: 707-795-7609 ext. 1029

Gregory Nichols
Phone: 707-795-7609 ext. 1052

If you believe your privacy rights have been violated, you may file a written complaint with Sonoma Recovery Services LLC by contacting the Privacy Officer at the number above. You will be provided with instructions on how to submit your written complaint.

You may also file a complaint with the U.S. Department of Health and Human Services, Office for Civil Rights, by visiting www.hhs.gov/ocr, or by contacting:

U.S. Department of Health and Human Services
Office for Civil Rights
Phone: 1-800-368-1019
TTY: 1-800-537-7697

For concerns related to substance use disorder services, you may also contact:

California Department of Health Care Services

Substance Use Disorder Services

P.O. Box 997413

Sacramento, CA 95899-7413

Phone: 916-322-2911

Fax: 916-440-5094

We will not retaliate against you or penalize you in any way for filing a complaint.

Effective Date: February 16, 2026