



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 your substance use disorder (SUD) records and other information about your health, and how you can access that information. It describes your rights and our responsibilities with respect to your health information under the Health Insurance Portability and Accountability Act of 1996 (HIPAA), the Confidentiality of Medical Information Act (CMIA), the California Health & Safety Code § 11845.5, 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 confidentiality regulations governing SUD treatment records (42 C.F.R. Part 2) apply to certain records we create or receive, those records will be used and disclosed only as permitted by Part 2 and applicable state law. Records to which Part 2 does not apply will be used and disclosed in accordance with HIPAA, CMIA, California Health & Safety Code § 11845.5, and other applicable laws. Because different laws may apply to different parts of your record, we explain below how information is handled depending on the law that applies.

Our Responsibilities:

We are required by law to maintain the privacy and security 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.

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 and Copies of 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 may ask us to amend health information in our records if you believe it is incorrect or incomplete. We may deny your request in some circumstances, but if we do, we will explain why in writing.

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 42 C.F.R. 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, subject to the scope and effective dates of applicable federal law.

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.

Right to Personal Representative:

You have the right to have a personal representative act on your behalf with respect to your health information, to the extent that person is authorized under applicable law.

Right to Discuss This Notice and Ask Questions:

You have the right to discuss and ask questions about this notice with one of our privacy officers, listed at the bottom of this notice.

Right to File a Complaint:



You have the right to file a complaint if you believe your privacy rights have been violated.

Your Choices:

For certain uses and disclosures, we will require your written authorization. Because some of the health information we maintain may be protected by CMIA, California Health and Safety Code section 11845.5, and, if applicable, 42 C.F.R. Part 2, written authorization may be required even in situations where HIPAA alone might otherwise permit disclosure. With your written authorization, and to the extent permitted by law, we may share information with family members, friends, or others involved in your care or payment for your care, and we may disclose information to employers, schools, attorneys, sober living environments, social service agencies, or other third parties you identify. If you are unable to tell us your preference, we may share information only to the extent permitted by applicable law.

How We May Use and Disclose Your Information:

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

We may use and disclose your health information for treatment, payment, and health care operations as permitted by HIPAA and other applicable law. Examples include coordinating your care with other treating providers, submitting information to a health plan for authorization or payment, conducting utilization review, quality improvement, credentialing, auditing, and other activities needed to operate our program. If 42 C.F.R. Part 2 applies to certain records, we will obtain any consent or authorization required by Part 2 before making TPO disclosures, including, where permitted by law, a single consent for future TPO uses and disclosures.

Important California Limits on SUD Records: If California Health and Safety Code section 11845.5 applies to particular records, those records are confidential and may be disclosed only to the extent, under the circumstances, and for the purposes clearly stated in the signed release of information.

Uses and Disclosures Requiring Your Written Authorization:

We will obtain your written or valid electronic authorization before using or disclosing your information for purposes not described in this Notice or otherwise permitted by law. This includes most non-treatment, payment, or health care operations disclosures; most disclosures to family or friends when more protective law requires authorization; and marketing communications that require authorization. HIPAA requires written authorization for the sale of protected health information, and we do not sell protected health information.

We also require written authorization for the use or disclosure of psychotherapy notes, as defined in 45 C.F.R. § 164.501, except as permitted by law; and, if 42 C.F.R. Part 2 applies, for SUD counseling notes as defined in 42 C.F.R. Part 2.



We will obtain separate, specific written consent before making any audio or video recording of individual therapy or group sessions for AI-assisted transcription or summarization.

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

Certain Uses and Disclosures Without Your Authorization:

We may use or disclose your information without your authorization only when the law permits or requires it. The specific rule depends on the type of information involved.

If 42 C.F.R. Part 2 applies to certain records, we may use or disclose those records without your authorization only as specifically permitted by Part 2 and other applicable laws. Examples include disclosures for emergency medical treatment; certain research, audit, or program evaluation activities; certain reports of crimes committed on program premises or against program personnel; certain required reports of suspected child abuse or neglect; and disclosures authorized by a court order and other legal process required by law.

When Part 2 does not apply to a particular record, we may use or disclose that record without your authorization only as permitted by HIPAA and applicable California law. Some California laws are more protective than HIPAA and may further limit the use or disclosure of certain records, including certain substance use disorder records.

When Part 2 does not apply and when no more protective California law limits the disclosure, we may use or disclose health information without your authorization as permitted by HIPAA and California law, including for public health activities; when required by law, and for certain other disclosures permitted by HIPAA and applicable California law; for health oversight activities; in response to court orders and certain other legal process as permitted by law; to family members, close personal friends, or others involved in your care or payment for care, or to notify such persons of your location, general condition, or death, as permitted by HIPAA and California law; and, in limited circumstances, and only when permitted by applicable law, we may disclose limited information to reduce a serious and imminent threat to health or safety. Any such disclosure will be limited to what is reasonably necessary for that purpose and, unless permitted or required by law, will not identify you as receiving substance use disorder treatment or disclose SUD treatment information protected by more restrictive law.

Lawsuits, Investigations, and Legal Proceedings: We may respond to court or administrative orders and other legal process only to the extent permitted by applicable law. If Part 2 applies to certain records, we will not use or disclose those records in civil, criminal, administrative, or legislative proceedings against you without your written consent or a court order and, where required, a subpoena or similar legal mandate. A subpoena alone is not enough when more protective law requires additional process.



AI-Assisted Clinical Documentation:

We may use AI-assisted clinical documentation tools to help authorized staff prepare, organize, or review records. Any vendor providing these services must enter into a Business Associate Agreement or other legally required agreement and may access only the information permitted by law and reasonably necessary to perform its functions. We will not audio- or video-record individual therapy or group sessions for AI-assisted transcription or summarization unless you first provide separate, specific written consent.

Breach Notification:

We will notify you of a breach of unsecured protected health information as required by HIPAA and applicable state law. If 42 C.F.R. Part 2 applies to certain records, we will also comply with any applicable Part 2 breach notification requirements

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, wish to discuss it with us, or believe your privacy rights have been violated, you may contact one of our Privacy Officers at the number listed below. You may file a written complaint with Sonoma Recovery Services LLC by contacting a Privacy Officer, and we will provide instructions on how to submit your complaint. We will not retaliate against you or penalize you for filing a complaint.

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

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

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

Effective Date: February 16, 2026