**NOTICE OF PRIVACY PRACTICES**

for the Healthcare Facility of:

Name of Facility: Purdue University Northwest Counseling Center

Hammond Campus
Address: 2200 169th, Gyte 005
TECH 101
Hammond, Indiana 46323
219 989 2366

Westville Campus
1401 South US Hwy 421,
Westville, Indiana 46391
219 989 2366

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

Client Privacy and Releases of Information

Professional ethical codes and state and federal laws consider the personal information discussed in therapy to be confidential. All information gathered in therapy, including the fact that you have come to the Purdue University Northwest Counseling Center (PNWCC) is held in strict confidence. No information is released to university officials, faculty members, parents, or outside agencies without written authorization from you.

Certain obligations arise from legislation and statutes that apply to psychologists and other mental health clinicians. The Purdue University Northwest Counseling Center complies with all applicable laws and professional standards relating to the privacy of patient information. The Health Insurance Portability and Accountability Act (HIPAA) does not apply to the Purdue University Northwest Counseling Center, however, we are dedicated to maintaining our clients privacy by adhering to the following procedures:

- **Confidentiality/privilege**: All information concerning use of our services is protected under Indiana law. This describes the legal issue of privileged communication. Part of our professional duty and relationship with you includes that we work to protect the confidentiality of students seeking services at PNWCC.

Confidential information will not be released without valid written consent from you except under the following circumstances:

- We are obligated by law to report suspected child abuse and neglect to the Department of Children’s Services.
- We are obligated by law to report suspected elder abuse or neglect to the Department of Human Services.
- We are obligated to take appropriate action if a client represents a threat of harm to self or others, and to take any necessary action to prevent such harm from occurring.
- If a client is involved in court matters, we may be required to release the record per court order.

**Clients under 18 years of age**

In Indiana a child 18 and over may consent to treatment. For students under the age of 18 years, issues of confidentiality and privilege are somewhat different from those of students over the age of 18. Unless an individual under 18 years of age is emancipated, they do not own privilege. While they can expect that we will maintain their confidentiality, they need to be informed that their parent, guardian or custodian bears the legal right to request information concerning the student's treatment.

**Securing client information**

1. No client information should leave the Center. This includes written and electronic versions or student information.
2. No student files or identifying information should remain unattended or left in non-secure areas.
3. All client records are the property of the Purdue University Northwest Counseling Center. We function as the custodians of student health records.
4. All computers should be shut-down at the end of the work day or upon leaving the office for an extended period of time.
5. In order to use client materials for educational purposes the materials must be altered to sufficiently protect the identity of the client before they may be removed from the Center.
6. Audio and video recordings of therapy sessions are confidential and should remain in a secure storage area when not in use.
7. Recordings should be reused or erased after supervision.
8. No recordings should be removed from the Purdue University Northwest Counseling Center.

Requests for Release of Information from other Agencies
Requests for release of information from other agencies should be accompanied by a current, signed release of information form, requesting information from the Center or a specific person employed at the Center. These requests should be handled in a timely manner. The former client's therapist or supervisor is responsible for evaluating the request and submitting the appropriate information. When neither the therapist nor the supervisor is available, the Director should handle these requests. Usually, a summary will suffice. When confidential records are released, stamp all pages with the red “Confidential” stamp located at the clerical staff’s desk.

Request to View Files
Students, or the parents or the legal guardians of students under 18 years of age, have the legal right to review their files and have a copy of its content, provided the information contained in the file is not harmful to them. When a client, parent or legal guardian of a minor, or former client requests to review the file, the following procedure should be followed:

1. The student, parent or legal guardian of a minor, must sign a Request to Review File form which will be placed in the client's file. A session to review the file will be scheduled within 10 working days of receipt of the request.
2. The student, parent or legal guardian of a minor, must present positive identification, including picture ID, unless a staff member can identify the student.
3. Ideally, the student, parent or legal guardian of a minor, will schedule a time to review the file with the current or former therapist. If the therapist no longer is on staff, the student will schedule an appointment with a senior staff member or extern.

Copies of files
Following the presentation of a valid release of information or a court order, copies of the files will be released within 10 working days using a fee scale that is consistent with the Rules and Regulations of the Board of Examiners in Psychology. To protect confidentiality, proof of identification may be required. When outside agents (e.g., FBI) request to review the file, the following procedure must be used:

1. The agent must provide a signed release of information form correctly identifying the student and the Counseling Center or the student's therapist.
2. The agent must sign the Request to Review File which will be placed in the client's file.
3. The agent must schedule a time to review the file with a senior staff member or extern.

Client’s requests concerning tapes of sessions
Clients have the right to decline taping at any time and they have the right to request that material be erased. Tapes/DVDs of sessions are the property of the Center and are not to be given to clients. When a client wants to view or listen to a tape/DVD, it should be done in the presence of the client's therapist, or the therapist should arrange for an office where the client can listen/view the tape in private. Supervisees should discuss this with their supervisor prior to allowing clients to review tape.

Release of Information
Use the Authorization for Release and Exchange of Information form whenever any information is to be released about the content of sessions or files. A release of information must be signed in order to acknowledge that the student has an appointment at the Center or has been seen. This may be done using the Authorization for Release of Information forms. If the student agrees to sign the release form, he/she has the right to limit the type of information that is released. The student also has the right to revoke the release of information form at any time by making such a request in writing.

Whenever a student was referred by another person or agency, it is appropriate to determine if the person or agency can be notified that the student kept the appointment. This is especially important when the student was referred by faculty or staff members. The signing of the form should be witnessed and signed by someone other than the client and therapist. The front desk secretary usually can serve as a witness. Information regarding the areas of alcohol and drugs or HIV/AIDS requires a specific release on related information and a general release is not sufficient to allow for the release of such information.
OPTIONAL RULES FOR NOPP

Faxing and Emailing Rule

When you request us to fax or email your PHI as an alternative communication, we may agree to do so, but only after having our Privacy Officer or treating doctor review that request. For this communication, our Privacy Officer will confirm that the fax number or email address is correct before sending the message and ensure that the intended recipient has sole access to the fax machine or computer before sending the message; confirm receipt, locate our fax machine or computer in a secure location so unauthorized access and viewing is prevented; use a fax cover sheet so the PHI is not the first page to print out (because unauthorized persons may view the top page); and attach an appropriate notice to the message. Our emails are all encrypted per Federal Standard for your protection.

Practice Transition Rule

If we sell our practice, our patient records (including but not limited to your PHI) may be disclosed and physical custody may be transferred to the purchasing healthcare provider, but only in accordance with the law. The healthcare provider who is the new records owner will be solely responsible for ensuring privacy of your PHI after the transfer and you agree that we will have no responsibility for (or duty associated with) transferred records. If all the owners of our practice die, our patient records (including but not limited to your PHI) must be transferred to another healthcare provider within 90 days to comply with State & Federal Laws. Before we transfer records in either of these two situations, our Privacy Officer will obtain a Business Associate Agreement from the purchaser and review your PHI for super-confidential information (i.e. communicable disease records), which will not be transferred without your express written authorization (indicated by your initials on our Consent form).

Inactive Patient Records

We will retain your records for seven years from your last treatment or examination, at which point you will become an inactive patient in our practice and we may destroy your records at that time (but records of inactive minor patients will not be destroyed before the child’s eighteenth birthday). We will do so only in accordance with the law (i.e. in a confidential manner, with a Business Associate Agreement prohibiting re-disclosure if necessary).

Collections

If we use or disclose your PHI for collections purposes, we will do so only in accordance with the law.
“What I Need to Know for Progress in Counseling”

Missed & Cancelled/Rescheduled Appointments
1. You will be allotted (3) cancellation/no-show/rescheduled appointments each semester. A referral list of mental health resources within the NWI area will be provided to you to utilize these services for the remainder of the present semester should suspension of services due to non-attendance be implemented.
2. If you are an existing client, you are expected to arrive on-time to your scheduled appointment, if you are more than 5 minutes late, you may be asked to reschedule for the following week.
3. If you are a new client, you are expected to arrive 10-15 minutes before your appointment to fill out the required paperwork, otherwise you will be asked to reschedule.

Excluded Services
1. Assessments/Evaluations to be used in court proceedings or other litigation (e.g., competency evaluations, custody evaluations.)
2. Any services that are court-ordered or a requirement of adjudicated legal sanctions.
3. Services that are directed from other areas/persons of the College with the exception of the following: assessment of imminent threat to self and/or others and two-session substance use screening and intervention. The following services are excluded: interviews for papers, (any #) sessions for course credit, and/or inventories/assessments for course credit; any other utilization of Counseling Center staff/resources for University Course credit.
4. Services in which the Counseling Center would need to be the primary coordinator for extensive inter-agency case management.
5. Longer-term treatment services or specialized clinical services.
6. Students who are actively engaged in psychological counseling with another provider.
7. Letters to document student’s request for comfort animal.
8. Letters for application for a license to carry firearms.
9. Medical and pre-surgical assessment for various procedures that require psychological reports. (Gastric bypass surgery, gender confirmation surgery, hormone replacement therapy).
10. Psychological assessment may be limited to the testing protocol owned by the PNWCC. If there is benefit from additional assessment, referral to outside qualified providers will be provided.

Types of Student Needs Generally Referred Off-Campus
- Current life endangering symptoms of an eating disorder.
- The student has been diagnosed with a form of psychosis and/or manifests impairment with reality testing (e.g., cannot differentiate between reality and fantasy, experiences delusions, hallucinations or paranoia).
- Severe mental illness which is best treated through ongoing long-term treatment, based on the judgment of either; the Counseling Center clinician, the QAC, or both.
- History of sexual offenses / violence.
- The student currently appears to be incapable of exercising a reasonable level of judgment and self-care that would permit him/her to function both productively and autonomously in the college environment.
- The student presents an imminent danger to self or others (e.g., a student who articulates a determination to kill herself/himself, a student who lacks control of violent impulses, a student who is experiencing hallucinations that the clinician determines could be threatening to self or others, or a student who is unable to care for her/himself).
- Court-ordered treatment (e.g., treatment for violent criminal behavior, such as rape or pedophilia, or substance abuse or distribution violations).
- A student whose behavior creates a hostile working environment at the Counseling Center, affecting staff and/or other students (e.g., a student who is grossly verbally abusive and/or threatening towards staff).
- Students who indicate they are only interested in some sort of documentation for release from contracts (e.g. residence life, food services, academic requirements).
Limitations to Scope of Services

When certain concerns are present, the Counseling Center may choose to refer out to other providers or refuse treatment. This decision may be based on the presence of a single criteria or a combination of several, and it is made after discussion and consultation with the Quality Assurance Committee. It may be determined a student’s presentation falls under the limitations of the scope of services provided by the Counseling Center in the circumstances listed below. Additionally, if during the course of treatment a student’s condition changes or deteriorates, this policy may be enacted at that time.

1. Student presents with chronic and imminent danger to self or others (e.g., chronically has a plan and intent to kill themselves and prior services have not helped curb this presentation, a student is experiencing hallucinations and is unable to take care of themselves).
2. Any services that are court-ordered, forensically oriented, or a requirement of adjudicated legal sanctions (e.g., child custody disputes, divorce proceedings, forensic evaluations).
3. Services required or directed from other area/persons of the university (e.g., students referred as a requirement for cases of conduct at the university, interviews for papers, use of services for course credit). The following cases are exceptions: assessment of imminent threat to self and/or others, and two-session substance screening appointments as requires by the Athletic Department Policy following a failed drug test.
4. Treatment for a student who needs more intensive and extensive treatment than can be provided by the Counseling Center (e.g., long-term care, multiple weekly appointments, frequent between-sessions support, disorders in which the student is experiencing active psychosis, treatment for an eating disorder of a moderate to advanced stage that requires closely coordinated medical, nutritional, and psychiatric care; treatment for a substance addiction of a moderate to advanced stage that requires sessions more than once per week, regular medical monitoring, inpatient or residential care, detoxification, or is at-risk to live in residence halls or attend classes).
5. Services in which the Counseling Center would need to be the primary coordinator for extensive inter-agency case management.
6. Treatment for a student actively engaged in psychological treatment with another provider or has previously been engaged in long-term therapy.
7. Services in which the student has sought counseling but is nevertheless fundamentally unwilling to address the disorder in question (e.g., student’s attendance is inconsistent, refusal to attempt change, and/or refusal to receive outside treatment as referred by the therapist, including referral for medication consult/adherence).
8. Treatment for a student whose behavior creates a hostile working environment at the Counseling Center, affecting staff and/or other students (e.g., a student who is verbally abusive to and/or threatens staff).
9. Services to document for the purposes of a letter to recommend a service, therapy, or emotional support animal.
10. Letters for application for a license to carry firearms.
11. Medical and pre-surgical psychological assessment for various medical procedures (e.g., gastric bypass surgery, gender confirmation surgery, hormone replacement therapy).
12. Other situations that are determined to be outside the scope of the services provided by this facility or in which case the clinical staff member determines the treatment would be detrimental to the client or to the proper functioning of this facility.
13. Services are only available to currently enrolled students. The Counseling Center does not serve:
   - Incoming students prior to attending at least one class
   - Seniors who have graduated
   - Alumni
   - Faculty or staff (beyond consultation)