

Notice of Privacy Practices (NPP)

Gradual Behavioral Health

1. Notice of Privacy Practices (NPP) – Updated February 16, 2026

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.

I. Our Legal Duty

We are required by law to maintain the privacy of your protected health information (PHI), to provide you with this notice of our legal duties and privacy practices, and to notify you following a breach of unsecured PHI. We must follow the privacy practices described in this notice while it is in effect.

II. Uses and Disclosures of Health Information

We use and disclose PHI for treatment, payment, and healthcare operations.

- **Treatment:** We may use or disclose PHI to a BCBA, RBT, pediatrician, or other healthcare provider providing treatment to your child.
- **Payment:** We may use and disclose PHI to bill and collect payment from Georgia Medicaid, commercial insurers, or other payers.
- **Healthcare Operations:** We may use PHI for quality assessment, clinical audits, and business planning.

Special Protections for Substance Use Disorder (SUD) Records

In accordance with the **CARES Act** and **42 CFR Part 2**, if we receive or maintain records regarding substance use disorder treatment:

1. **Written Consent:** We will obtain your written consent before using or disclosing SUD records for treatment, payment, or healthcare operations. Once consent is obtained, we may redisclose these records as permitted by HIPAA.

2. **Legal Proceedings:** SUD records and any testimony relaying their content shall not be used or disclosed in any civil, criminal, administrative, or legislative proceedings against you without your specific written consent or a court order.

3. **No Segregation Required:** We are no longer required to segregate SUD records from your child's general clinical file, ensuring better care coordination.

III. Your Rights Regarding PHI

Access: You have the right to inspect and receive a copy of your child's health records.

Accounting of Disclosures: You have the right to receive a list of instances in which we disclosed PHI for purposes other than treatment, payment, and healthcare operations. For SUD records maintained in an electronic health record, you have a right to an accounting of all disclosures.

Restriction Requests: You have the right to request that we restrict our use or disclosure of PHI. We are required to agree if the disclosure is to a health plan for payment or operations and the service was paid in full out-of-pocket.

Fundraising: If we use your information for fundraising, you have the right to opt-out of such communications in a clear and conspicuous manner.

IV. Notice of Potential Redisclosure

Information disclosed pursuant to this notice may be subject to redisclosure by the recipient and may no longer be protected by the **HIPAA Privacy Rule**. However, if the information is protected by **42 CFR Part 2**, strict federal prohibitions on redisclosure may still apply.

V. Complaints and Contact Information

If you believe your privacy rights have been violated, you may file a complaint with our Privacy Officer or the Secretary of the U.S. Department of Health and Human Services. We will not retaliate against you for filing a complaint.

Privacy Officer: Meaghan Timko

Address: 275 Interstate North Circle SE, Atlanta, GA 30339

Phone: (404) 941-8614 Ext. 101

Email: compliance@gradualbh.com