



NOTICE OF PRIVACY PRACTICES

Compass Rose Counseling and Wellness, LLC | Effective: October 26, 2026

THIS NOTICE DESCRIBES HOW MEDICAL AND MENTAL HEALTH INFORMATION ABOUT YOU MAY BE USED OR DISCLOSED, HOW YOU CAN ACCESS IT, AND YOUR PRIVACY RIGHTS. PLEASE REVIEW IT CAREFULLY.

We protect the privacy and security of your protected health information (PHI), provide this notice, and follow its terms while in effect. We will notify affected individuals of a breach of unsecured PHI when required by law. This notice applies to records maintained by Compass Rose Counseling and Wellness, LLC. Minnesota law may provide protections beyond the federal HIPAA Privacy Rule.

1 How we use information to care for you and operate our practice

Treatment: We use information to evaluate, provide, coordinate, and manage your mental health care. Consultation with a treating or consulting clinician may be permitted without a separate release under applicable law.

Payment: We use or disclose information for insurance eligibility, claims, billing, and payment as permitted by law.

Health care operations: We use information for scheduling, quality improvement, practice administration, compliance, and permitted audits. We may contact you with appointment reminders.

Minnesota protections: HIPAA permission does not always eliminate Minnesota consent requirements. Minnesota generally requires a signed and dated consent to release health records unless a specific legal exception applies. We obtain a release when required and limit disclosures to the lawful purpose.

2 When disclosure may occur without your written permission

Depending on the circumstances, federal or Minnesota law may require or permit disclosure for suspected child maltreatment or other legally reportable abuse; health oversight; certain public health purposes; workers' compensation; court orders and other lawful legal processes; limited law enforcement circumstances; and preventing or responding to serious threats to health or safety. Disclosures are evaluated under applicable law, including Minnesota's additional protections for mental health records. A subpoena or a request from a family member does not automatically entitle someone to your therapy records. We disclose only what the law permits or requires.

3 When we ask for written authorization

We generally obtain a valid written authorization before sharing records with schools, employers, attorneys, or others when no legal exception applies. We also obtain authorization for most uses or disclosures of separately maintained psychotherapy notes, most marketing uses, and any sale of PHI, subject to legal exceptions. An authorization describes the information, recipient, purpose, and expiration as required by law. You may revoke it in writing, except for actions already taken in reliance on it or other legal limitations. Minnesota authorizations generally last one year unless a different period is specified or required by law.

4 Special protection for substance use disorder records

Some records are subject to the federal confidentiality law **42 CFR Part 2**. Not all substance use information in a mental health record is automatically a Part 2 record. When we maintain Part 2 records, we follow the applicable consent and disclosure rules. With valid Part 2 consent, certain information may be used or shared for treatment, payment, and health care operations. Part 2 records generally cannot be used or disclosed in legal proceedings against you without the specific consent or legal authority required by Part 2. Additional protections may apply to SUD counseling notes. If we use Part 2 records for fundraising, you may opt out of fundraising communications; we do not currently use patient records for fundraising.



5 Your right to see, obtain, and correct your records

You may request to inspect or obtain a paper or electronic copy of records to which you are legally entitled. We respond within applicable legal time limits. **Minnesota does not permit a fee for a copy requested to review current medical care.** Other copying charges, when permitted, will not exceed applicable state and federal limits; we do not apply a blanket per-page fee. Limited legal grounds may permit withholding information, with applicable review rights. You may request an amendment if you believe a record is inaccurate or incomplete; if denied, we will explain available options.

6 Other privacy rights

Restrictions: You may request limits on certain uses or disclosures. We need not agree to every request, but generally must honor a qualifying request not to disclose information about a service to a health plan for payment or operations if you paid for that service in full out of pocket, unless disclosure is required by law.

Confidential contact: You may request reasonable alternative methods or locations for communications.

Disclosure accounting: You may request an accounting of certain disclosures as provided by law.

Paper copy: You may request a paper copy of this notice even if you received it electronically.

7 Parents, guardians, family, and support people

We do not automatically disclose records to a spouse, parent, caregiver, or other person solely because they request them. A legally authorized personal representative may have rights to act for a client, but Minnesota laws governing minors' consent and confidentiality, other applicable laws, and safety-related exceptions can limit access. We assess requests individually and involve clients in decisions about sharing information whenever appropriate.

8 Your choices and our responsibilities

When the law gives you a choice about sharing information, we will explain the options and follow your direction as required. We use reasonable administrative, physical, and technical safeguards to protect records. We may revise this notice and apply revised terms to information we maintain as allowed by law. The current notice will be posted at the practice and on our website, and available upon request. Other uses or disclosures not described here will be made only as authorized or permitted by law.

9 Questions, complaints, and privacy contact

Privacy Officer: Casey Wyman

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Email: casey@compassrose-cw.com

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You may contact the Privacy Officer to ask questions, exercise your rights, or file a privacy complaint. You may also complain to the U.S. Department of Health and Human Services, Office for Civil Rights. We will not retaliate against you for filing a complaint.

Availability: This notice is available on our website, in our waiting room, and in paper form upon request. We may ask you to acknowledge receipt or availability; your privacy rights do not depend on signing an acknowledgment.