WILHELM
Psychological Services

HIPAA Notice & Privacy Policy

Effective Date: 10/1/2026

HIPAA Notice of Privacy Practices

WPS is dedicated to protecting the privacy of your health information. We are required by law to maintain the confidentiality of your protected health information (PHI) and to provide you with this Notice of our legal duties and privacy practices. This Notice explains how your health information may be used and disclosed and how you can access this information. Please review it carefully. If you have any questions about this Notice, please contact the WPS Privacy Officer at: **gretchen@wilhelmpsychservices.com.**

Who Follows This Notice

This Notice applies to all WPS programs and affiliated entities. All WPS employees, contractors, volunteers, and health professionals authorized to access or document your information must follow the terms of this Notice.

WPS and its affiliated entities operate as a single organized system for purposes of providing care. As part of this system, health information may be shared among affiliated entities for treatment, payment, and healthcare operations in accordance with applicable law.

Our Pledge Regarding Your Health Information

We understand that your health information is personal. We create and maintain records of the care and services you receive to provide quality care and comply with legal requirements. This Notice applies to all records maintained by WPS.

By law, WPS is required to:
- Maintain the privacy of your PHI
- Provide you with this Notice of our legal duties and privacy practices
- Follow the terms of the Notice currently in effect
- Notify you in accordance with applicable law if a breach of unsecured PHI occurs

How We May Use and Disclose Health Information

The law allows WPS to use and disclose your PHI without written authorization in certain situations. We limit uses and disclosures of your PHI to the minimum necessary, except for disclosures made for treatment purposes or as otherwise required by law.

Treatment: We may use or share your information to provide, coordinate, or manage your care. This may include communication with physicians, counselors, or other providers involved in your treatment. WPS staff may also contact you for scheduling or follow-up purposes. While HIPAA permits sharing information for treatment without authorization, WPS may require a Release of Information in certain situations in accordance with internal policies.

Payment: We may use and disclose your information to obtain payment for services, including prior authorization, billing, and claims processing.

Health Care Operations: We may use your information for operational purposes such as quality improvement, staff training, audits, and program evaluation.

Other Permitted Uses and Disclosures

We may also use or disclose your PHI in the following situations, as permitted or required by law:
- **Aftercare and Referrals** – To inform you of treatment options or connect you with services; a Release of Information may be required
- **Health Oversight Activities** – For audits, investigations, licensing, and compliance (e.g., Medicaid, DBHDS, OIG)
- **Required by Law** – When disclosure is mandated by law
- **Public Health and Safety** – Including reporting abuse, neglect, communicable diseases, or threats to safety
- **Judicial and Administrative Proceedings** – In response to legal processes such as court orders or subpoenas**]**
- **Law Enforcement** – In limited circumstances permitted by law
- **Medical Examiners/Coroners** – To identify deceased individuals or determine cause of death
- **Serious Threats to Health or Safety** – To prevent or lessen a serious and imminent threat
- **Workers' Compensation** – As required for work-related injuries or illness
- **National Security** – For authorized federal activities
- **Research** – When approved and conducted in accordance with applicable law

Psychotherapy Notes: Psychotherapy notes receive special protection and will not be disclosed without your written authorization, except as permitted or required by law.

Your Rights Regarding Health Information

You have the following rights regarding your PHI:
- The right to inspect and obtain a copy of your records
- The right to request amendments to your records
- The right to receive an accounting of certain disclosures
- The right to request confidential communications
- The right to request restrictions on certain disclosures (with limited exceptions)
- The right to receive electronic copies of your records, if available
- The right to obtain a copy of this Notice at any time

Requests to exercise your rights must be submitted in writing to the WPS Privacy Officer at **info@wilhelmpsychservices.com**.

Changes to This Notice

WPS reserves the right to change this Notice at any time. Any changes will apply to all PHI maintained by WPS and will be made available through our offices and website. You will be informed of material changes and offered a copy of the updated Notice.

Complaint Process

If you believe your privacy or confidentiality rights have been violated, you may file a complaint. WPS will not retaliate against you for filing a complaint.

You may file a complaint in any of the following ways:

- **With WPS** – Email **gretchen@wilhelmpsychservices.com** to submit a written complaint or speak with your clinician or supervisor
- **With the Virginia Department of Health Professions** – Visit www.dhp.virginia.gov or call 1.800.533.1560
- **With the U.S. Department of Health & Human Services, Office for Civil Rights** – Visit www.hhs.gov/ocr/privacy/hipaa/complaints or call 1.800.368.1019

Limits to Confidentiality

Confidentiality is a critical component of the therapeutic relationship and is essential to establishing trust. Individuals receiving services must feel safe sharing personal and sensitive information. WPS protects the confidentiality of all client information in accordance with applicable federal and state laws. All uses and disclosures of information are governed by applicable federal and state laws, including HIPAA and Virginia regulations. Information will not be disclosed without the written consent of the individual or their legal guardian, except as permitted or required by law. You have the right to access your records and request copies in accordance with applicable laws and regulations. Limits to confidentiality include the following:

- **Duty to Warn and Protect**: If an individual discloses intent or a plan to harm themselves or others, the provider is required to take appropriate action to ensure safety, which may include notifying legal authorities and/or identified parties at risk and making reasonable attempts to notify family or guardians when appropriate.

- **Abuse or Neglect of Children or Vulnerable Adults**: WPS staff are mandated reporters. Any suspicion or disclosure of abuse or neglect of a child or vulnerable adult will be reported to the appropriate authorities in accordance with state law.

- **Prenatal Exposure to Controlled Substances**: Providers are required to report known prenatal exposure to controlled substances when mandated by law.

- **Court Orders and Legal Proceedings**: Client records may be disclosed when required by a valid court order or legal process.

- **Professional Misconduct**: Information may be disclosed as required in connection with investigations or proceedings related to professional misconduct.

- **Minors and Guardianship**: Parents or legal guardians of non-emancipated minors have the right to access records unless otherwise restricted by law.

- **In the Event of Death**: Access to records may be granted to authorized individuals (e.g., spouse or parent) in accordance with applicable law.

- **Payment and Health Care Operations**: Limited information may be disclosed for billing and payment purposes. If accounts become delinquent, collection agencies may be utilized; however, clinical details (e.g., case notes, treatment content) will not be disclosed. Information may also be shared with insurance companies or third-party payers as necessary for authorization and reimbursement, including service details, diagnosis, and treatment information.

- **Care Coordination and Consultation**: Information may be shared with other professionals involved in treatment for care coordination purposes. Reasonable efforts are made to limit disclosures to the minimum necessary information, except when information is shared for treatment purposes or as otherwise required by law.

- **Use of Administrative or Support Services**: Client information may be used or disclosed for administrative purposes (e.g., documentation, transcription), with appropriate safeguards in place.

- **Communication:** Phone calls, voicemail, and text messaging may be used for scheduling and care coordination. These methods may not be fully secure; however, reasonable precautions are taken, and only limited information will be shared through these methods.