

Family Adolescent Child Treatment Service, LLC

4801 W. Peterson Ave., Suite 401

Chicago, IL 60646

Effective Date: February 16, 2026

HIPAA Notice of Privacy Practice- 42 C.F.R Part 2

This policy establishes procedures to ensure compliance with:

- Federal confidentiality protections for Substance Use Disorder (SUD) treatment records under 42 C.F.R. Part 2 and federal protections for reproductive health information under HIPAA, including restrictions on disclosure for certain investigations or proceedings.

This policy governs how protected records are created, maintained, used, and disclosed by this practice. This policy applies to:

- All workforce members, contractors, trainees, and volunteers.
- All forms of records, including electronic, paper, verbal, and digital communications.
- All patient information that qualifies as: SUD treatment records subject to Part 2, reproductive health information protected under HIPAA, and any information that may fall under both categories.

Definitions

Part 2 Program- A Federally assisted individual or entity that provides diagnosis, treatment, or referral for treatment of Substance Use Disorders and holds itself out as providing such services.

SUD Patient Record- Any information that identifies an individual as having applied for or received SUD diagnosis, treatment, or referral from a Part 2 program.

Reproductive Health Care- Health care affecting the reproductive system and related conditions, including but not limited to contraception, fertility services, pregnancy care, miscarriage care, abortion, and related services.

Protected Health Information (PHI)- Individually identifiable health information protected under HIPAA.

General Confidentiality Principles

Patient information is confidential and disclosed only as permitted by law. Part 2 protections are more restrictive than HIPAA and must be followed when applicable. Reproductive health information has additional protections against disclosure for certain legal or investigative purposes. Minimum necessary standards apply where permitted by law.

Substance Use Disorder Records (42 C.F.R. Part 2)

General Rule: SUD patient records may not be disclosed unless the patient provides written consent that meets part 2 requirements, OR a specific legal exception applies.

Required Elements Of Written Consent: Consent must include patient name, specific program making disclosure, recipient of disclosure, purpose of disclosure, description of information to be disclosed, patient signature and date, expiration date or event, and revocation statement.

Redisclosure Prohibition Notice: All disclosures must include the required notice prohibiting redisclosure unless permitted by Part 2.

Permitted Disclosures Without Consent (Limited): Examples include: Medical emergencies, Qualified service organizations, Research (with regulatory safeguards), Court orders meeting Part 2 requirements, program audits or evaluations.

Reproductive Health Information Protections (HIPAA)

Prohibition on Certain Disclosures: The Family Adolescent Child Treatment Service, LLC will not disclose reproductive health information for the purpose of investigating or imposing liability on a person for seeking, obtaining, providing, or facilitating lawful reproductive health care, nor will disclosures occur in identifying individuals involved in lawful reproductive care.

Attestation Requirement; When requested disclosures could involve reproductive health information for law enforcement, judicial, or administrative purposes, the requesting party must provide a signed attestation confirming the request is not for prohibited purposes. No disclosure will occur without valid attestation on behalf of the patient, where required.

Verification; Staff must verify the identity and authority of the requestor, the validity of attestation, and the legal basis for disclosure.

When Information Falls Under Both Part 2 and Reproductive Protections

If information is both a Part 2 SUD record AND reproductive health information we will apply the more restrictive standard, which is typically Part 2.

Patient Rights

Patients have the right to: receive a notice of privacy practice (HIPAA form), request restrictions on disclosures, access their records/paperwork (with limited exceptions), request amendments, revoke consent for disclosure (where applicable), receive an accounting of disclosures where required, and file complaints without retaliation.

Notice of Privacy Practices (NPP)

The NPP must include: a description of Part 2 confidentiality protections, reproductive health disclosure restrictions, attestation requirements, patient rights and complaint procedures.

Workforce Responsibilities

All workforce members must: complete confidentiality (HIPAA) training, protect patient information from unauthorized access, follow minimum necessary standards, immediately report suspected breaches, and use secure communication systems.

Documentation Requirements

The Family Adolescent Child Treatment Service, LLC will maintain signed consent forms, attestations for reproductive health disclosures, and disclosure logs when required.

THIS POLICY WILL BE REVIEWED ANNUALLY OR WHEN FEDERAL OR STATE LAW CHANGES. WE ARE REQUIRED TO FOLLOW THE TERMS OF THIS NOTICE THAT ARE CURRENTLY IN EFFECT. IF STATE OR OTHER LAWS REQUIRE GREATER LIMITS OF DISCLOSURE, WE WILL UPDATE THIS FORM AND NOTIFY YOU. THE NEW NOTICE WILL BE AVAILABLE UPON REQUEST, IN OUR OFFICE, AND ON OUR WEBSITE. THIS NOTICE IS EFFECTIVE FEBRUARY 16, 2026.

Privacy Officers/Clinical Directors: Dr. Jennifer Davis and Dr. Michelle S. White (773) 282-2322