



NOTICE OF PRIVACY PRACTICES

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.

Groff & Associates, LLC, is committed to protecting your privacy. The Practice is required by federal law to maintain the privacy of Protected Health Information (“PHI”), which is information that identifies or could be used to identify you. The Practice is required to provide you with this Notice of Privacy Practices (this “Notice”), which explains the Practice's legal duties and privacy practices and your rights regarding PHI that we collect and maintain.

Effective Date: January 1, 2026

When this Notice refers to “Groff & Associates, LLC,” “we,” or “our,” it includes Groff & Associates, LLC and its affiliated licensed clinicians, supervised residents, and interns, who together operate as an **Organized Health Care Arrangement (OHCA)** under the **Health Insurance Portability and Accountability Act (HIPAA)** and applicable Indiana law.

Organized Health Care Arrangement (OHCA)

Groff & Associates, LLC and its affiliated licensed clinicians, supervised residents, and interns participate in an Organized Health Care Arrangement (OHCA) as defined under the Health Insurance Portability and Accountability Act (HIPAA). This arrangement allows the clinicians within Groff & Associates, LLC to share protected health information with one another as necessary for treatment, payment, and health care operations. Each member of the OHCA will follow the privacy practices described in this Notice when using or disclosing protected health information created or received as part of services provided through Groff & Associates, LLC.

YOUR RIGHTS

Your rights regarding PHI are explained below. To exercise these rights, please submit a written request to the Practice at the address noted below.

To inspect and copy PHI.

- You have the right to inspect and receive a copy of your protected health information in paper or electronic form.
- You may request that we transmit an electronic copy of your protected health information directly to a third party you designate in writing.



- We will provide access within the time required by law and will charge a reasonable, cost-based fee.
- We may deny your request in certain limited circumstances. You may request a review of that decision.

To amend PHI.

- You can ask to correct PHI you believe is incorrect or incomplete. The Practice may require you to make your request in writing and provide a reason for the request.
- The Practice may deny your request. The Practice will send a written explanation for the denial and allow you to submit a written statement of disagreement.

To request confidential communications.

- You can ask the Practice to contact you in a specific way. The Practice may say “yes” to reasonable requests.

To limit what is used or shared.

- You can ask the Practice not to use or share PHI for treatment, payment, or business operations. The Practice is not required to agree if it would affect your care.
- If you pay for a service or health care item out-of-pocket in full, you can ask the Practice not to share PHI with your health insurer.
- You can ask for the Practice not to share your PHI with family members or friends by stating the specific restriction requested and to whom you want the restriction to apply.

To obtain a list of those with whom your PHI has been shared.

- You may request an accounting of disclosures made during the six (6) years prior to your request, excluding disclosures for treatment, payment, and healthcare operations and you will be charged a reasonable fee.
- You are entitled to one accounting within a 12-month period, a reasonable, cost-based fee will apply.

To receive a copy of this Notice.

- You can ask for a paper copy of this Notice, even if you agreed to receive the Notice electronically.

To choose someone to act for you.

- If you have given someone medical power of attorney or if someone is your legal guardian, that person can exercise your rights.



To file a complaint if you feel your rights are violated.

- You can file a complaint by contacting the Practice.
- You can file a complaint with the U.S. Department of Health and Human Services Office for Civil Rights by sending a letter to 200 Independence Avenue, S.W., Washington, D.C. 20201, calling 1-877-696-6775, or visiting www.hhs.gov/ocr/privacy/hipaa/complaints/.
- The Practice will not retaliate against you for filing a complaint.

To opt out of receiving fundraising communications.

- The Practice may contact you for fundraising efforts, but you can ask not to be contacted again.

To file a complaint or exercise your rights, contact the practice using the information below:

Groff & Associates, LLC
HIPAA Security Officer
7425 E. 86th St. Indianapolis, IN 46256

OUR USES AND DISCLOSURES

1. Routine Uses and Disclosures of PHI

The Practice is permitted under federal law to use and disclose PHI, without your written authorization, for certain routine uses and disclosures, such as those made for treatment, payment, and the operation of our business. The Practice typically uses or shares your health information in the following ways:

To treat you.

- The Practice can use and share PHI with other professionals who are treating you.
Example: Your primary care doctor asks about your mental health treatment.

To run the health care operations.

- The Practice can use and share PHI to run the business, improve your care, and contact you.
Example: The Practice uses PHI to send you appointment reminders if you choose.

To bill for your services.

- The Practice can use and share PHI to bill and get payment from health plans or other entities.
Example: The Practice gives PHI to your health insurance plan so it will pay for your services.

2. Uses and Disclosures of PHI That May Be Made Without Your Authorization or Opportunity to Object

The Practice may use or disclose PHI without your authorization or an opportunity for you to object, including:



To help with public health and safety issues.

- Public health: To prevent the spread of disease, assist in product recalls, and report adverse reactions to medication.
- Required by the Secretary of Health and Human Services: We may be required to disclose your PHI to the Secretary of Health and Human Services to investigate or determine our compliance with the requirements of the final rule on Standards for Privacy of Individually Identifiable Health Information.
- Health oversight: For audits, investigations, and inspections by government agencies that oversee the health care system, government benefit programs, other government regulatory programs, and civil rights laws.
- Serious threat to health or safety: To prevent a serious and imminent threat.
- Abuse or Neglect: To report abuse, neglect, or domestic violence.

To comply with law, law enforcement, or other government requests

- Required by law: If required by federal, state or local law.
- Judicial and administrative proceedings: To respond to a court order, subpoena, or discovery request.
- Law enforcement: For law enforcement to locate and identify you or disclose information about a victim of a crime.
- Specialized Government Functions: For military or national security concerns, including intelligence, protective services for heads of state, or your security clearance.
- National security and intelligence activities: For intelligence, counterintelligence, protection of the President, other authorized persons or foreign heads of state, for purpose of determining your own security clearance and other national security activities authorized by law.
- Workers' Compensation: To comply with workers' compensation laws or support claims.

To comply with other requests

- Coroners and Funeral Directors: To perform their legally authorized duties.
- Organ Donation: For organ donation or transplantation.
- Research: For research that has been approved by an institutional review board.



- Inmates: The Practice created or received your PHI in the course of providing care.
- Business Associates: To organizations that perform functions, activities or services on our behalf.

Special Protections for Reproductive Health Care Information

We will not use or disclose your protected health information for the purpose of conducting a criminal, civil, or administrative investigation into, or imposing liability on any person for, the lawful provision, receipt, or facilitation of reproductive health care. In certain circumstances, we may be required to obtain a signed attestation from a requesting party before disclosing protected health information that may relate to reproductive health care.

3. Uses and Disclosures of PHI That May Be Made with Your Authorization or Opportunity to Object

Unless you object, the Practice may disclose PHI:

- To your family, friends, or others if PHI directly relates to that person's involvement in your care.
- If it is in your best interest because you are unable to state your preference.

4. Uses and Disclosures of PHI Based Upon Your Written Authorization

The Practice will not sell your protected health information without your written authorization. The Practice must obtain your written authorization to use and/or disclose PHI for the following purposes:

- Marketing,
- Sale of PHI, or
- Psychotherapy notes.

5. Use and Disclosure of Substance Use Disorder Records Subject to 42 CFR Part 2:

(A) If applicable, your substance use disorder (“SUD”) records are protected by federal law under 42 C.F.R. Part 2 (“Part 2”). This law provides extra confidentiality protections and requires a separate patient consent for the use and disclosure of SUD counseling notes. Each disclosure made with patient consent must include a copy of the consent or a clear explanation of the scope of the consent. It must also be accompanied by a written notice containing the language in 42 CFR Part 2.32(a). Disclosure of these records requires your explicit written consent, except in limited circumstances such as:

- Medical Emergencies: to the extent necessary to treat you,



- Reporting Crimes on Program Premises,
- Child Abuse Reporting: In connection with incidents of suspected child abuse or neglect to appropriate state or local authorities, and
- Fundraising: We will provide you with an opportunity to decline to receive any fundraising communications prior to making such communications.

You may revoke your authorization at any time in writing, except to the extent that we have already acted in reliance on it.

(B) Prohibitions on Use and Disclosure of Part 2 Records:

SUD records received from programs subject to Part 2, or testimony relaying the content of such records, shall not be used or disclosed in civil, criminal, administrative, or legislative proceedings against you unless based on your written consent, or a court order after notice and an opportunity to be heard is provided to you or the holder of the record, as provided in Part 2. A court order authorizing use or disclosure must be accompanied by a subpoena or other legal requirement compelling disclosure before the requested SUD record is used or disclosed. If SUD records are disclosed to us or our business associates pursuant to your written consent for treatment, payment, and healthcare operations, we or our business associates may further use and disclose such health information without your written consent to the extent that the HIPAA regulations permit such uses and disclosures, consistent with the other provisions in this Notice regarding PHI.

You may revoke your authorization, at any time, by contacting the Practice in writing, using the information above. The Practice will not use or share PHI other than as described in Notice unless you give your permission in writing.

OUR RESPONSIBILITIES

- The Practice is required by law to maintain the privacy and security of PHI.
- The Practice is required to abide by the terms of this Notice currently in effect. Where more stringent state or federal law governs PHI, the Practice will abide by the more stringent law.
- The Practice reserves the right to amend Notice. All changes are applicable to PHI collected and maintained by the Practice. Should the Practice make changes, you may obtain a revised Notice by requesting a copy from the Practice, using the information above, or by viewing a copy on the website www.GroffandAssociates.com.
- We will notify you without unreasonable delay and no later than 60 days after discovery if a breach of unsecured protected health information occurs that compromises the privacy or security of your information.