

Effective Date: 7/29/2025

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North Sound Behavioral Health Administrative Services Organization, LLC

Section 2000 – Privacy: Web Platform Collection of Protected Health Information

Authorizing Source: 45 CFR 164 (HIPAA); 42 CFR Part 2 (Part 2); RCW 70.02

Approved by: Executive Director Date: 7/29/2025

Signature:



POLICY # 2026.00

SUBJECT: WEB PLATFORM COLLECTION OF PROTECTED HEALTH INFORMATION (PHI)

PURPOSE

Describe how North Sound Behavioral Health Organization (BH-ASO) collects, safeguards, uses, and maintains protected health information (PHI) that is collected via the North Sound BH-ASO website and other North Sound BH-ASO web platforms.

POLICY

At North Sound BH-ASO, protecting your privacy and safeguarding your sensitive health information is our top priority. This Privacy Policy explains how we collect, use, disclose, and protect personally identifiable information, including PHI—through our various websites, which are designed to comply with the Health Insurance Portability and Accountability Act (HIPAA) Privacy and Security Rules.

PROCEDURES

Information We Collect

1. **Personally Identifiable Information.** When you complete any form on our Site (e.g., contact form, patient intake), we may collect personal information such as:
 - a. Name, address, date of birth;
 - b. Email address, telephone number;
 - c. Health insurance details; and
 - d. Medical History, current health information.
2. **Automatically Collected Data.** We may automatically collect non-PHI technical data to improve Site functionality, such as IP addresses, browser type, pages visited, language and referring URLs.
3. **Cookies and Tracking.** We currently do not use web tracking technologies such as cookies, flash cookies or web beacons for analytics or retaining preferences. However, these automatic tracking technologies may become necessary in the future to provide features or services as Web Application User Experience (UX) requirements develop.

How We Use Your Information.

We use collected information for purposes permitted under HIPAA, including:

- Treatment and care coordination;
- Appointment scheduling and reminders;
- Billing and insurance claims processing;
- Compliance with legal and regulatory requirements; and
- Quality improvement and Site performance analysis.

Disclosure of PHI

We will not disclose your PHI except as permitted or required by HIPAA, including:

- To healthcare providers and insurers involved in your care or claims;
- To our Business Associates (e.g., hosting providers, payment processors) bound by HIPAA Business Associate Agreements;
- When required by law (e.g., public health reporting, court orders); and
- To avert a serious threat to health or safety.

Business Associates

Certain functions of our Site may be performed by third-party service providers (“Business Associates”). We enter into HIPAA-compliant Business Associate Agreements (BAA) to ensure they safeguard your PHI.

Security Measures

We implement administrative, physical, and technical safeguards to protect PHI, including:

- Encryption of PHI in transit (HTTPS/TLS) and at rest;
- Access controls and authentication requirements;
- Regular security risk assessments; and
- Employee training on HIPAA compliance.

Your Rights Under HIPAA

You have the right to:

- Access and obtain a copy of your PHI;
- Request amendments to your PHI;
- Request an accounting of disclosures of your PHI;
- Request restrictions on certain uses and disclosures; and
- Receive communications by alternative means or at alternative locations.

To exercise any rights, please submit your request in writing to the Contact Information below. We will respond within the timeframes required by law.

Breach Notification

In the unlikely event of a breach of unsecured PHI, we will follow HIPAA Breach Notification Rules, including notifying affected individuals, the U.S. Department of Health and Human Services, and, if applicable, the media.

Parental Consent

Our Site is not intended for individuals under age 13 without parental/guardian consent. Any submissions for individuals under 13 years of age must have parental/guardian consent before submitting any PHI via our web platforms. If parental/guardian consent is not obtained then the record will permanently deleted.

Third-Party Links

Our Sites contain links to third-party websites. We are not responsible for their privacy practices. We encourage you to review their policies for further information.

Updates to This Policy

We may update this Privacy Policy as needed to reflect changes in our practices or legal requirements. We will post the revised Policy with a new “Effective Date.”

User Consent

By voluntarily submitting your information through any form on our Site, you provide your express consent for us to collect, use, and disclose your personal and health information as described in this Privacy Policy and in compliance with applicable laws, including HIPAA.

Before submitting any form, you will be presented with a clear acknowledgment statement outlining how your information will be used. By checking the box or clicking submit, you confirm that:

- You have read and understood this Privacy Policy;
- You consent to the use of your information for the purposes outlined herein; and
- You are legally authorized to provide the information you submit.

If you do not agree with the terms of this Privacy Policy, please do not submit any personal or health information through the Site. You may contact us directly to explore alternative methods of communication.

By using our Site and submitting information, you acknowledge that you have read and understood this Privacy Policy and agree to its terms.

Contact Information

If you have any questions, requests, or complaints regarding this Privacy Policy or your privacy rights, contact:

North Sound BH-ASO
Privacy Officer
2021 E. College Way, Suite 101
Mount Vernon, WA 98273
Email: privacy_officer@nsbhaso.org
Phone: (360) 416-7013

If you have questions regarding the collection and storage of HIPAA information on the North Sound BH-ASO website, contact:

North Sound BH-ASO
Security Officer
Email: security_officer@nsbhaso.org
Phone: (360) 416-7013

ATTACHMENTS

None