



**Minnesota Recovery Connection
Privacy Practices, Grievance Procedure, and Bill of Rights**

HIPAA and Privacy Practices

The Health Insurance Portability & Accountability Act of 1996 (HIPAA) is a federal program that requires that all medical records and other individually identifiable health information used or disclosed by us in any form—electronically, on paper, or orally—are kept properly confidential. HIPAA gives you, the participant, the right to understand and control how your PHI is used. HIPAA provides penalties for covered entities that misuse personal health information.

As required by HIPAA, we prepared this explanation of how we are to maintain the privacy of your health information and how we may disclose your personal information.

We may use and disclose your medical records only for the following purposes: provision of peer support, payment, and health care operation.

- Responding to a crisis or emergency situation and/or coordinating healthcare and related services by one or more healthcare providers
- Payment activities and obtaining reimbursement for services, confirming coverage, billing or collections activities, and utilization review. An example of this would include sending your insurance company a bill for your visit
- Health Care Operations include the business aspects of running MRC, such as providing quality peer services and improving activities, auditing functions, cost management analysis, and customer service

MRC may also be required or permitted to disclose your PHI for audits by the State or by a Health Plan that pays for your services. MRC may also (in rare circumstances) be ordered by law enforcement to disclose information.

We may contact you, by phone or in writing, to provide appointment reminders or information about activities and/or services.

Other than the situations noted above, your PHI will only be released when you provide written permission to release your PHI. You may revoke such authorization in writing, and we are required to honor and abide by that written request, except to the extent that we have already taken actions relying on your prior authorization.

You have the following rights with respect to your PHI:

- The right to request restrictions on certain uses and disclosures of PHI, including those related to disclosures to family members, other relatives, close personal friends, or any other person identified by you.

We are not required to honor a request restriction except in limited circumstances which we shall explain if you ask. If we do agree to the restriction, we must abide by it unless you agree in writing to remove it.

- The right to reasonable requests to receive confidential communications of Protected Health Information by alternative means or at alternative locations
- The right to inspect and copy your PHI
- The right to amend your PHI
- The right to receive an accounting of disclosures of your PHI
- The right to obtain a paper copy of this notice from us upon request
- The right to be advised if your unprotected PHI is intentionally or unintentionally disclosed

If you have paid for services "out of pocket", in full and in advance, and you request that we not disclose PHI related solely to those services to a health plan, we will accommodate your request, except where we are required by law to make a disclosure.

We are required by law to maintain the privacy of your Protected Health Information and to provide you this notice of our legal duties and our privacy practice with respect to PHI.

This notice is effective as of 1/1/2020 and it is our intention to abide by the terms of the Notice of Privacy Practices and HIPAA Regulations currently in effect. We reserve the right to change the terms of our Notice of Privacy Practice and to make the new notice provisions effective for all PHI that we maintain. We will post and you may request a written copy of the revised Notice of Privacy Practice from our office.

You have recourse if you feel that your protections have been violated by our office. You have the right to file a formal, written complaint with our office and with the Department of Health and Human Services, Office of Civil Rights. We will not retaliate against you for filing a complaint.

Feel free to contact the Practice Compliance Officer (MRC Executive Director) for more information, in person or in writing.

Grievance Procedure

All participants of Minnesota Recovery Connection have a right to be treated fairly with dignity and respect. If a situation arises where a participant feels that they were not treated appropriately or that their rights have been violated, that participant may formally or informally file a grievance.

The internal grievance system:

1. A staff member is available to help you develop and process a grievance. A grievance will be responded to within three days of a staff member's receipt of the grievance, and the participant may bring the grievance to the highest level of authority in the program if not resolved by another staff member.
2. You are encouraged to talk directly to the person involved in the grievance and seek resolution. If you cannot resolve your concern in this way, then: Contact **Sarah Kemp, Director of Community Engagement**
sarah.kemp@minnesotarecovery.org | 612-584-4158 ext. 220

If you are unable to resolve your issue through the internal grievance procedure, you may use the external grievance system by contacting any of the following agencies:

As required by Minnesota Statute 254B.05, Subdivision 1(d)(14), you may also contact the following organizations if you have a complaint about Minnesota Recovery Connection or the person providing your peer recovery support services:

- **DHS Licensing Division** – 444 Lafayette Road, St. Paul, MN 55155 | (651) 431-6500
- **Minnesota Adult Abuse Reporting Center (MAARC)** – 1-844-880-1574
- **Minnesota Alliance of Recovery Community Organizations (MARCO)**
800 Transfer Rd., Ste. 31, Saint Paul, MN 55114
(612) 888-9001
<https://marcomn.org>
info@marcomn.org
Submit a complaint: <https://form.jotform.com/251915495622058>
- **Office of Ombudsman for Mental Health and Developmental Disabilities**
332 Minnesota Street, Suite W1410, First National Bank Building, Saint Paul, MN 55101-2117
651-757-1800 or 1-800-657-3506
<https://mn.gov/omhdd/>
ombudsman.mhdd@state.mn.us
[How to file a complaint](#)

Minnesota Recovery Connection will not retaliate against a participant in peer recovery support services because of a complaint.

Participants Bill of Rights

Upon service initiation, MRC must give each participant information on the participant's rights and responsibilities. A staff member must review the statement with a participant at that time. The participant Bill of Rights shall be prominently displayed on the premises.

A participant has the right to have, and a staff member has the responsibility to provide, a nontechnical explanation of the nature and purpose of the recovery services to be provided. The staff shall establish procedures to be followed if the explanation is to be provided by another individual under their direction.

Consumers of services have the right to:

1. Expect that the provider meets the minimum qualifications of training and experience required by state law
2. Examine public records maintained by the Certification Board that contain the credentials of the provider

3. Report complaints to the Department of Human Services
4. Be informed of potential costs before receiving the services
5. Privacy as defined and limited by law and rule
6. Be free from being the object of unlawful discrimination while receiving services
7. Have access to their records
8. Be free from exploitation
9. Terminate services at any time
10. Know the intended participant's assessment results

Stereotyping: The provider shall treat the participant as an individual and not impose on the participant any stereotypes of behavior, values, or roles related to human diversity.

Exploitation of participant: The provider shall not exploit the relationship with a participant for the provider's emotional, financial, sexual, or personal advantage or benefit. This prohibition extends to former participants who are vulnerable or dependent on the provider.

Sexual behavior with participant:

A provider shall not engage in any sexual behavior with a participant including:

1. Sexual contact, as defined in section 604.20, subdivision 2
2. Any physical, verbal, written, interactive, or electronic communication, conduct, or act that may be reasonably interpreted to be sexually seductive, demeaning, or harassing to the participant

Participant Acknowledgment:

I hereby acknowledge understanding and receipt of MRC's Notice of Privacy Practices, Bill of Rights, and Grievance Procedures.

Name (please print): _____

Signature: _____

Date: _____