Notice of Privacy Practices

California Autism Pathways to Success, LLC (CAPS Centers) · Effective date: October 24, 2026

> **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.**

This notice applies to the health information CAPS Centers creates or receives in providing Applied Behavior Analysis (ABA) therapy, PEERS® social skills programs, life coaching and related services, and in billing for those services. “You” means the client. When the client is a minor or has a legal representative, the parent, guardian or personal representative may generally exercise these rights on the client’s behalf, as described below.

Your Rights

When it comes to your health information, you have certain rights. This section explains your rights and some of our responsibilities to help you.

Get a copy of your health and billing records

- You can ask to see or get an electronic or paper copy of your health record and other health information we have about you. Ask us how to do this.
- We will provide access as required by law, usually within **5 working days** to inspect your records and within **15 days** for copies, as provided by California law, and in no case later than 30 days. We may charge a reasonable, cost-based fee.

Ask us to correct your record

- You can ask us to correct health information about you that you think is incorrect or incomplete. Ask us how to do this.
- We may say “no” to your request, but we’ll tell you why in writing within 60 days. California law also allows you to add a written addendum to your record.

Request confidential communications

- You can ask us to contact you in a specific way (for example, a particular phone number or email) or to send mail to a different address.
- We will say “yes” to all reasonable requests.

Ask us to limit what we use or share

- You can ask us not to use or share certain health information for treatment, payment, or our operations. We are not required to agree, and we may say “no” if it would affect your care.
- If you pay for a service or item out-of-pocket in full, you can ask us not to share that information with your health insurer for payment or operations. We will say “yes” unless a law requires us to share it.

Get a list of those with whom we’ve shared information

- You can ask for a list (accounting) of the times we’ve shared your health information for six years prior to the date you ask, who we shared it with, and why.
- We will include all disclosures except those about treatment, payment, and health care operations, and certain other disclosures (such as any you asked us to make). We’ll provide one accounting a year for free but may charge a reasonable, cost-based fee if you ask for another one within 12 months.

Get a copy of this privacy notice

You can ask for a paper copy of this notice at any time, even if you have agreed to receive it electronically. We will provide you with a paper copy promptly. It is also available on this page as a PDF download.

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 and make choices about your health information.
- For minor clients, parents and legal guardians are generally the personal representative and may exercise these rights. California law gives minors control over certain information in limited situations (for example, services a minor may lawfully consent to on their own), and a provider may limit a parent’s access where permitted by law, such as when access would harm the provider’s professional relationship with the minor or the minor’s well-being.
- We will make sure the person has this authority and can act for you before we take any action.

File a complaint if you feel your rights are violated

- You can complain if you feel we have violated your rights by contacting our Privacy Officer using the information at the end of this notice.
- 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/.

- We will not retaliate against you for filing a complaint.

Your Choices

For certain health information, you can tell us your choices about what we share. If you have a clear preference for how we share your information in the situations described below, talk to us. Tell us what you want us to do, and we will follow your instructions.

In these cases, you have both the right and choice to tell us to:

- Share information with your family, close friends, or others involved in your care (for example, a caregiver or another household member who helps with sessions)
- Share information in a disaster relief situation

If you are not able to tell us your preference, for example if you are unconscious, we may go ahead and share your information if we believe it is in your best interest. We may also share your information when needed to lessen a serious and imminent threat to health or safety.

In these cases, we never share your information unless you give us written permission:

- Marketing purposes
- Sale of your information
- Most sharing of psychotherapy notes

Fundraising: CAPS Centers does not use client information for fundraising. If that ever changes, you will have the right to opt out of any fundraising communications.

Our Uses and Disclosures

We typically use or share your health information in the following ways.

To treat you

We can use your health information and share it with other professionals who are treating you. *Example:* your BCBA shares assessment results and treatment goals with the behavior technician delivering your sessions, or coordinates with your pediatrician or another provider involved in your care.

To run our organization

We can use and share your health information to run our practice, improve your care, train staff, and contact you when necessary. *Example:* we review session data to supervise staff and monitor the quality of the services you receive, and we send appointment reminders.

To bill for your services

We can use and share your health information to bill and get payment from health plans or other entities. *Example:* we give information about you, your diagnosis and the services provided to your health insurance plan to obtain authorization for ABA services and so it will pay for them.

How else can we use or share your health information?

We are allowed or required to share your information in other ways, usually in ways that contribute to the public good. We have to meet many conditions in the law before we can share your information for these purposes.

- **Help with public health and safety issues:** such as reporting suspected child abuse, neglect, or elder or dependent adult abuse as required by California law, and preventing or reducing a serious threat to anyone's health or safety.
- **Do research:** we can use or share your information for health research only as permitted by law, generally with your authorization or approval by a research review board.
- **Comply with the law:** we will share information about you if state or federal laws require it, including with the Department of Health and Human Services if it wants to see that we're complying with federal privacy law.
- **Respond to organ and tissue donation requests** and **work with a medical examiner or funeral director**, when applicable.
- **Address workers' compensation, law enforcement, and other government requests:** for workers' compensation claims; for law enforcement purposes or with a law enforcement official; with health oversight agencies for activities authorized by law (such as licensing boards and audits); and for special government functions such as military, national security, and presidential protective services.
- **Respond to lawsuits and legal actions:** in response to a court or administrative order, or in response to a subpoena, as permitted by law.
- **Business associates:** we may share information with companies that perform services for us, such as our practice-management and electronic records system, billing services and IT providers. They are required by contract and by law to protect your information.

California law

California law, including the Confidentiality of Medical Information Act, sometimes provides more protection than federal law. Where California law is more protective of your information or gives you greater rights, we follow California law.

Substance use disorder treatment records

CAPS Centers does not provide substance use disorder (SUD) treatment. If we ever receive SUD treatment records protected by federal law (42 C.F.R. Part 2), we will use and disclose them only as that law allows, which is more restrictive than the rules described above. Those records, or testimony relaying their content, will not be used or disclosed in any civil, criminal, administrative, or legislative proceeding against you unless you give written consent or a court issues an order after you have been given notice and an opportunity to be heard.

Information shared with others

When we disclose your health information as permitted by law, the recipient may in some cases share it again (redisclose it), and it may then no longer be protected by the federal privacy rules.

Our Responsibilities

- We are required by law to maintain the privacy and security of your protected health information.
- We will let you know promptly if a breach occurs that may have compromised the privacy or security of your information.
- We must follow the duties and privacy practices described in this notice and give you a copy of it.
- We will not use or share your information other than as described here unless you tell us we can in writing. If you tell us we can, you may change your mind at any time. Let us know in writing if you change your mind.

For more information, see www.hhs.gov/hipaa/for-individuals/notice-privacy-practices/index.html.

Changes to the Terms of This Notice

We can change the terms of this notice, and the changes will apply to all information we have about you. The new notice will be available upon request, in our office, and on our website.

Contact Our Privacy Officer

Privacy Officer, California Autism Pathways to Success, LLC (CAPS Centers)
Email: info@capscenters.org
Phone: 1-888-ABA-4945
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