



A Different Kind of Therapy

Comprehensive Privacy Policy

Effective Date: 5/1/2025

Contact Information

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1. PURPOSE & SCOPE

This Privacy Policy explains how A Different Kind of Therapy collects, uses, retains, discloses, and protects **personal health information (PHI)** and other **personally identifiable information (PII)** of its clients. It complies with:

Jurisdiction	Governing Law(s)
United States (federal)	HIPAA (Health Insurance Portability and Accountability Act)
Virginia	Virginia Consumer Data Protection Act (VCDPA) & Virginia Confidentiality of Medical Records Act
District of Columbia	D.C. Personal Data Protection Act (DCPDPA) & D.C. Health Care Information Act

Jurisdiction	Governing Law(s)
Florida	Florida Information Protection Act (FIPA) & Florida Statutes §§ 456.057 (confidentiality of health-care information)
Maryland	Maryland Personal Information Protection Act (MPIPA) & Maryland Health-Care Information Act (MHCIA)

The policy applies to all information gathered **in-person, by phone, or electronically** (email, text, video-conference, client portal, etc.).

2. INFORMATION COLLECTED

Category	Typical Examples
Identifying Information	Name, DOB, SSN, driver's license, mailing/e-mail/phone contacts
Health-Related Information	Diagnoses, treatment plans, progress notes, medication lists, mental-health assessments, crisis-intervention notes
Payment & Billing Information	Insurance carrier data, policy numbers, invoices, credit-card numbers (when processed)
Electronic Communications	Emails, SMS/texts, video-conference recordings, portal messages
Technical Data	IP address, device type, browser version (collected only for security/audit purposes)

How it's collected

- Directly from you (intake forms, consent forms, verbal disclosures)
 - Through third-party services (insurance verification portals, EHR platforms, payment processors, secure messaging services such as Proton Mail/Drive)
 - Automatically via server logs for the client portal (used solely for security monitoring)
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3. WHY YOUR INFORMATION IS USED

1. **Provide Clinical Services** – assessment, diagnosis, therapy, follow-up care, crisis response.
 2. **Billing & Reimbursement** – claim submission, payment processing, and receipt issuance.
 3. **Client Communication** – appointment scheduling, reminders, answering inquiries.
 4. **Legal & Regulatory Compliance** – record-keeping, mandatory reporting (e.g., child abuse, imminent danger), responding to subpoenas or court orders.
 5. **Quality Improvement & Supervision** – aggregated, de-identified data may be used for audits, supervision, or research (only with explicit consent).
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4. LEGAL BASIS FOR PROCESSING

- **Consent** – Signed HIPAA Authorization and/or separate privacy consent at intake.

- **Contractual Necessity** – Services rendered under the therapist-client agreement.
- **Legitimate Interests** – Protecting practice security and fulfilling statutory duties.

5. DISCLOSURE OF INFORMATION

Recipient	Reason for Disclosure
Other Health-Care Providers	Coordination of care, referrals, and consultations
Health-Care Payers (Insurance Companies)	Claims processing, eligibility verification
Court or Government Agencies	Court orders, subpoenas, mandatory reporting (e.g., child abuse, threats of harm)
Business Associates	Vendors performing services on our behalf (EHR host, secure email provider, payment processor). All sign a HIPAA Business Associate Agreement (BAA).
Aggregated De-Identified Data	Research, quality-improvement, statistical reporting (no individual can be identified)

6. DATA RETENTION (STATE-SPECIFIC)

State	Clinical Records	Billing/Financial Records	Electronic Communications
Virginia	Minimum 10 years after last service (VA Board requirement)	7 years (tax/insurance)	90 days (unless part of permanent record)
District of Columbia	Minimum 7 years after last service (DC Board requirement)	7 years	90 days
Florida	Minimum 7 years after last service (FL Board requirement)	7 years	90 days
Maryland	Minimum 7 years after last service (MD Board requirement)	7 years	90 days

When the longest applicable period applies, A Different Kind of Therapy retains the record for that duration.

All records beyond their retention period are **securely destroyed** (paper shredding, cryptographic erasure of electronic files).

7. SECURITY SAFEGUARDS

- **Encryption** – TLS 1.3 for data in transit; AES-256 for data at rest (e.g., stored on Proton Drive).

- **Access Controls** – Role-based logins, strong password policy, two-factor authentication (2FA) for A Different Kind of Therapy.
- **Physical Security** – Locked cabinets for paper records, restricted office access.
- **Regular Audits & Training** – Quarterly risk assessments, vulnerability scans, mandatory privacy/security training..
- **Breach Notification** – Incident-response plan that meets the most stringent state requirement (generally **within 60 days** of discovery).

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. YOUR RIGHTS (FEDERAL + STATE)

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ou have the following rights under HIPAA and the applicable state law(s).
Submit a written request to the contact information above to exercise any of them.

1. **Access** – Obtain a copy of your PHI (reasonable fees may apply).
 2. **Amend** – Request correction of inaccurate or incomplete information.
 3. **Restrict** – Request limits on certain disclosures where permissible.
 4. **Accounting of Disclosures** – Receive a list of disclosures made in the past 12 months.
 5. **Data Portability** – Receive a portable copy of your PHI in a commonly used electronic format.
 6. **Withdraw Consent** – Revoke any previously given authorization (except where needed for ongoing treatment or legal obligations).
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9. COOKIES & TRACKING (CLIENT PORTAL)

A Different Kind of Therapy client portal may set **essential cookies** for session management and security. No advertising or third-party tracking cookies are used. Disabling cookies may affect portal functionality.

10. CHANGES TO THIS POLICY

A Different Kind of Therapy reviews this policy **annually** or whenever a material change occurs in its practices or in the law. Updated versions will be posted on its website and communicated to existing clients via email or postal mail.

11. CONTACT & COMPLAINTS

If you have questions, concerns, or wish to file a complaint about this privacy policy, please contact:

Privacy Officer / LCSW: Lisa Hedrick

Phone: [Phone Number]

Email: differentkindoftherapy@pm.me

You also have the right to file a complaint with:

- **U.S. Department of Health & Human Services – Office for Civil Rights** (HIPAA)
- **Virginia Attorney General – Consumer Protection Division** (for Virginia residents)
- **District of Columbia Office of the Attorney General – Consumer Protection Division** (for DC residents)

- **Florida Office of the Attorney General – Division of Consumer Protection** (for Florida residents)
- **Maryland Attorney General – Consumer Protection Division** (for Maryland residents)