

Notice of Privacy Practices

The Pinnacle Group

Effective Date: 03.15.2026

THIS NOTICE DESCRIBES HOW MEDICAL INFORMATION ABOUT YOU OR YOUR CHILD MAY BE USED AND DISCLOSED AND HOW YOU CAN GET ACCESS TO THIS INFORMATION. PLEASE REVIEW IT CAREFULLY.

The Pinnacle Group provides Applied Behavior Analysis (ABA) services. Because our services are often provided to children, references in this Notice to “you” may include **the patient and the patient’s parent or legal guardian.**

Our Responsibilities

The Pinnacle Group is required by law to:

- Maintain the privacy and security of protected health information (PHI)
- Provide you with this Notice explaining our legal duties and privacy practices
- Follow the terms of the Notice currently in effect
- Notify you if a breach occurs that may have compromised the privacy or security of your information

We reserve the right to change this Notice. Any revised Notice will apply to all information we maintain and will be available upon request.

How We May Use and Disclose Health Information

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

Treatment

We may use and disclose health information to provide and coordinate ABA services.

Examples:

- Behavior analysts reviewing session notes to adjust treatment plans
- Supervising Registered Behavior Technicians (RBTs)
- Coordinating care with physicians, psychologists, speech therapists, occupational therapists, or schools involved in your child’s care

Payment

We may use or disclose health information to bill and receive payment for services.

Examples:

- Submitting claims to insurance companies or Medicaid
- Providing documentation needed for prior authorization or reimbursement

Health Care Operations

We may use health information for business operations necessary to run our organization.

Examples include:

- Quality improvement
- Clinical supervision
- Staff training
- Compliance reviews and internal audits
- Accreditation and licensing activities

Telehealth Services

The Pinnacle Group may provide ABA services using **telehealth technologies**, such as secure video conferencing platforms.

During telehealth services:

- Health information may be transmitted electronically.
- We use secure systems designed to protect your privacy whenever possible.
- Telehealth may involve remote observation of therapy or supervision of staff.

While we use safeguards to protect information, electronic communication may involve some privacy risks.

Other Uses and Disclosures Permitted by Law

We may disclose health information without your authorization in certain situations allowed by law.

Required by Law

We will disclose information when required by federal law or Florida law.

Public Health and Safety

We may disclose information to:

- Prevent serious threats to health or safety
- Report communicable diseases
- Support public health investigations

Abuse, Neglect, or Domestic Violence

Florida law requires certain professionals to report suspected abuse, neglect, or exploitation of children or vulnerable individuals.

Health Oversight Activities

We may disclose information to agencies responsible for oversight of the healthcare system for activities such as:

- Audits
- Investigations
- Licensure reviews
- Regulatory inspections

Judicial or Administrative Proceedings

We may disclose information in response to:

- Court orders
- Subpoenas
- Other lawful legal processes

Florida law permits medical records to be disclosed in legal proceedings when proper notice and legal requirements are satisfied.

Law Enforcement

We may disclose information to law enforcement officials under certain circumstances permitted by law.

Workers' Compensation

We may disclose information for workers' compensation claims or similar programs.

Special Protections for Substance Use Disorder Records

Substance use disorder treatment records received from programs subject to 42 CFR Part 2, or testimony relaying the content of such records, shall not be used or disclosed in civil, criminal, administrative, or legislative proceedings against the individual unless based on written consent, or a court order after notice and an opportunity to be heard is provided to the individual or the holder of the record, as provided in 42 CFR Part 2.

A court order authorizing use or disclosure must be accompanied by a subpoena or other legal requirement compelling disclosure before the requested record is used or disclosed.

Special Considerations for Minors

Because many services are provided to children:

- Parents or legal guardians generally have the right to access and control their child's health information.
- Under HIPAA, a parent or guardian typically acts as the personal representative of the minor and may exercise privacy rights on the child's behalf.
- In certain situations where Florida law allows a minor to consent to specific health services independently, access to records may be restricted as required by law.

If custody arrangements, guardianship documents, or court orders affect access to a child's records, we may request documentation.

Your Rights Regarding Health Information

You have the following rights regarding your protected health information.

Right to Inspect and Obtain Copies

You have the right to inspect and obtain copies of medical records and other health information we maintain about you.

Parents or legal guardians generally exercise this right on behalf of minors.

Right to Request Amendments

If you believe information in your record is incorrect or incomplete, you may request that we correct or amend it.

Right to Request Confidential Communications

You may request that we contact you in a specific way or at a specific location.

Right to Request Restrictions

You may request restrictions on certain uses or disclosures of your health information. We will consider requests but may not always be able to agree.

Right to an Accounting of Disclosures

You may request a list of certain disclosures of your health information made during the previous six years.

Right to a Paper Copy of This Notice

You have the right to receive a paper copy of this Notice at any time.

Uses and Disclosures Requiring Authorization

Certain uses and disclosures will only be made with your written authorization, including:

- Most marketing uses of health information
- Certain disclosures of psychotherapy notes
- Any other uses not described in this Notice

You may revoke authorization at any time in writing.

Complaints

If you believe your privacy rights have been violated, you may file a complaint with The Pinnacle Group or with the U.S. Department of Health and Human Services.

You will **not be penalized or retaliated against** for filing a complaint.

Contact Information

If you have questions about this Notice or our privacy practices, please contact:

Privacy Officer

Jessica Doll

The Pinnacle Group

Email: JessicaDoll@pinnacleabaservices.com

Phone: 305-453-6334

Address: 6150 Second St. #2
Key West, FL 33040

You may also file a complaint with:

U.S. Department of Health and Human Services

Office for Civil Rights

<https://www.hhs.gov/ocr/privacy/hipaa/complaints/>

I have received a copy of The Pinnacle Group's HIPAA Privacy Policy

Parent/guardian

Date