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Notice of Privacy Practices

Effective Date: 11/02/2026

VERO PLLC | Caleb Talbot, MA, LLP
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Your Information. Your Rights. Our Responsibilities.

This notice explains how information about your physical and mental health may be used or disclosed, the protections that apply to that information, and your rights to access and control certain uses of your records. Please review it carefully.

VERO PLLC provides psychological services, including psychotherapy and psychological assessment. In providing these services, VERO creates, receives, and maintains information that may be protected under the Health Insurance Portability and Accountability Act (HIPAA), Michigan law, and other applicable confidentiality requirements.

This notice applies to protected health information maintained by VERO PLLC in connection with its health care activities.

1. Your Rights Regarding Health Information

You have important rights concerning your health information. VERO is responsible for respecting these rights and responding to requests as required by law.

Accessing Your Records

You may request access to, or a copy of, your health information maintained in VERO's designated record set.

Copies may be provided electronically or on paper, when available and appropriate.

Requests will generally be addressed within 30 days, subject to applicable legal requirements and permitted extensions. Reasonable, legally permitted fees may apply.

Certain information, including separately maintained psychotherapy notes as defined by HIPAA, may be excluded from the right of access.

Requesting Corrections

If you believe information in your record is inaccurate or incomplete, you may request an amendment.

VERO will review your request and respond in writing within the time required by law, generally 60 days, subject to permitted extensions.

If an amendment is denied, you will be informed of the reason and any applicable rights to submit a statement of disagreement.

Requesting Confidential Communications

You may ask VERO to communicate with you through a particular method or at a particular location. For example, you may request that appointment-related communications be directed to a specific telephone number or mailing address. VERO will accommodate reasonable requests as required by law.

Requesting Restrictions on Disclosure

You may request limits on certain uses or disclosures of your health information for treatment, payment, or health care operations.

VERO is not generally required to agree to every requested restriction, but will consider such requests according to applicable law.

If you pay for a health care service entirely out of pocket, you may request that information about that service not be disclosed to your health plan for payment or health care operations purposes. VERO will honor that restriction when legally required, unless the disclosure is required by law.

Receiving an Accounting of Disclosures

You may request an accounting of certain disclosures of your protected health information made during the preceding six years.

Some disclosures, including many for treatment, payment, and health care operations, are excluded from this accounting under HIPAA.

One accounting during a 12-month period is provided without charge. Additional requests may be subject to a reasonable, cost-based fee as permitted by law.

Receiving a Copy of This Notice

You may request a paper or electronic copy of this notice at any time, even if you previously received or agreed to receive it electronically.

Designating a Personal Representative

A person legally authorized to act on your behalf may exercise certain rights concerning your health information.

VERO may require appropriate verification of that person's legal authority before providing access or honoring requests.

Special rules may apply to parents, guardians, and minors, including circumstances in which a minor has independent confidentiality rights.

Filing a Privacy Complaint

You may file a complaint if you believe your privacy rights have been violated.

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Complaints may be directed to VERO using the contact information provided in this notice.

You may also file a complaint with the U.S. Department of Health and Human Services, Office for Civil Rights:

U.S. Department of Health and Human Services
200 Independence Avenue, S.W.
Washington, D.C. 20201
Phone: 1-877-696-6775
Website: https://www.hhs.gov/hipaa/filing-a-complaint/index.html

VERO will not retaliate against you for submitting a privacy complaint.

2. Your Choices About Information Sharing

You have certain choices about how your information is shared with others.

Where permitted by law, you may identify family members, friends, caregivers, or other individuals with whom you wish information to be shared.

You may also request limitations on such communication. If you cannot express your preferences, VERO may use professional judgment when disclosure is legally permitted and reasonably necessary to protect your interests or safety.

In mental health care, additional confidentiality protections may apply. VERO will consider applicable federal and Michigan requirements before sharing information with family members or others involved in your care.

Uses Requiring Written Authorization

Except where specific legal exceptions apply, VERO will obtain appropriate written authorization before:

- Using or disclosing protected health information for purposes that require authorization under HIPAA.
- Disclosing separately maintained psychotherapy notes when authorization is required.
- Using protected health information for marketing activities requiring authorization.
- Selling protected health information.

An authorization may generally be revoked in writing, except to the extent VERO has already acted in reliance upon it or another legal exception applies.

3. Routine Uses and Disclosures

HIPAA generally permits VERO to use and disclose protected health information for treatment, payment, and health care operations without obtaining a separate written authorization, subject to applicable state laws and other protections.

Treatment

VERO may use your information to provide psychotherapy, psychological testing, diagnostic assessment, treatment planning, and related clinical services.

When legally permitted, relevant information may also be shared with other health care professionals involved in your treatment or coordination of care.

Payment

VERO may use and disclose information to obtain payment for services, verify insurance benefits, submit claims, respond to insurer requests, and address billing matters.

For example, an insurance claim may contain identifying information, service dates, procedure codes, diagnoses, and other information permitted or required for payment.

Health Care Operations

VERO may use or disclose information when legally permitted for activities necessary to operate the practice. These may include recordkeeping, quality improvement, administrative activities, compliance, practice management, professional consultation, and other legitimate health care operations.

Such activities may involve authorized service providers acting under appropriate privacy and security agreements when required.

4. Other Uses and Disclosures Permitted or Required by Law

In certain circumstances, information may be used or disclosed without your written authorization when permitted or required by applicable law.

These circumstances may include:

Safety concerns: Disclosures reasonably necessary to prevent or reduce a serious and imminent threat to health or safety, consistent with applicable law and professional obligations.

Abuse and neglect reporting: Reporting suspected child abuse, neglect, or other matters when reporting is required or authorized by law.

Public health: Certain legally authorized activities intended to protect public health.

Health oversight: Appropriate disclosures to agencies conducting legally authorized audits, investigations, inspections, or regulatory activities.

Legal proceedings: Disclosures required or permitted through valid legal processes, subject to applicable confidentiality, privilege, and procedural protections.

Law enforcement: Limited disclosures when specifically permitted or required by law.

Workers' compensation: Disclosures authorized by applicable workers' compensation laws.

Research: Uses or disclosures for research when applicable legal and privacy requirements have been satisfied.

Deceased individuals: Disclosures to coroners, medical examiners, or funeral directors when permitted by law.

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Special government functions: Certain disclosures authorized for activities such as national security or other specific government functions.

Other legally permitted situations may include specific public health programs, organ or tissue donation activities, and disclosures required to demonstrate compliance with privacy laws.

VERO will evaluate the legal basis for such disclosures and apply applicable limits, including heightened protections for mental health information.

5. Additional Protections for Mental Health Information

Psychological services frequently involve information of a particularly sensitive nature.

VERO recognizes the importance of protecting the confidentiality of information shared during psychotherapy, psychological assessment, and related services.

Psychotherapy Notes

HIPAA provides additional protections for psychotherapy notes that meet its specific definition and are maintained separately from the rest of the clinical record.

These notes generally require specific written authorization before disclosure, with limited exceptions permitted by law.

Routine progress notes, diagnoses, treatment plans, psychological testing results, and other clinical documentation are not necessarily classified as psychotherapy notes under HIPAA.

Michigan Confidentiality Protections

Michigan law provides additional protections for certain confidential communications between psychologists and individuals seeking professional services.

Among these protections, **MCL 333.18237** limits circumstances in which confidential information obtained by a psychologist in a professional capacity may be compelled to be disclosed.

Other Michigan confidentiality and privilege provisions may also apply depending on the circumstances and the records involved.

VERO will comply with applicable Michigan confidentiality laws when they provide additional protections or limitations beyond those established by HIPAA.

Minor Clients and Family Members

Privacy rights involving children and adolescents may differ depending on the minor's age, the type of services provided, the circumstances of consent, and applicable laws.

Parents or legal guardians may have authority to access certain information, but that authority is not unlimited in every circumstance.

VERO will evaluate requests for minors' information according to applicable legal requirements and the rights of the individuals involved.

6. Substance Use Disorder Treatment Records

Certain substance use disorder treatment records receive additional federal confidentiality protections under **42 CFR Part 2**.

When VERO receives or maintains records that are protected by Part 2, those records will be handled according to the applicable requirements.

In particular, Part 2-protected records may not be used or disclosed in civil, criminal, administrative, or legislative investigations or proceedings against the patient except as specifically authorized under Part 2, including appropriate patient consent or qualifying court-order procedures.

Where applicable, additional restrictions, authorization requirements, and protections may govern the use or disclosure of these records.

Part 2 protections are not automatically applicable to all information concerning substance use. Their application depends on the nature and source of the records and other federal requirements.

If VERO becomes subject to the separate notice requirements applicable to federally assisted Part 2 programs, those requirements must also be satisfied.

7. VERO's Responsibilities

VERO PLLC is required to:

- Protect the privacy and security of protected health information as required by law.
- Follow the privacy practices described in the notice currently in effect.
- Make this notice available to individuals as required.
- Provide notification of breaches involving protected health information when required by applicable law.
- Limit uses and disclosures to those authorized or permitted by applicable law.
- Respect legally valid restrictions, authorizations, and individual privacy rights.

VERO uses electronic practice management and communication services as part of its operations. Protected health information handled through these services remains subject to applicable privacy and security requirements.

When a business associate agreement is required for a service provider handling protected health information on VERO's behalf, VERO is responsible for ensuring that the arrangement satisfies applicable requirements.

8. Changes to This Notice

VERO reserves the right to revise its privacy practices and this Notice of Privacy Practices as permitted by law.

Revisions may apply to protected health information already maintained by VERO as well as information received after the change.

The current notice will be made available through VERO's website, at the office, and upon request.



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9. Questions, Requests, and Complaints

To ask questions about this notice, exercise privacy rights, request access to records, or raise concerns about the handling of protected health information, contact:

Privacy Contact
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For communications involving sensitive health information, VERO may arrange to use a secure communication method appropriate to the request.

You may also submit a HIPAA privacy complaint directly to the U.S. Department of Health and Human Services Office for Civil Rights.

Your privacy matters. VERO is committed to respecting the confidentiality of information shared in the course of seeking or receiving psychological services, while fulfilling its professional and legal responsibilities.