



PARTICIPANT HANDBOOK

**GOODWILL INDUSTRIES
OF GREATER GRAND RAPIDS, INC.**

TABLE OF CONTENTS	Page #
Intake Topics	4
Rights/Accessibility Visual	6
Preface	7
Welcome, Mission, Values	7
Goodwill History and Structure	9
Program/Service Requirements and Expectations	9
Program Entrance Criteria and Order of Acceptance	
Medical Information / Medication	
Exiting Goodwill Programs and/or Services	
Reasons Your Program and/or Services Could be Terminated	
Special Policy on the Relationship of Goodwill Staff and Participants	12
Things You Need to Know	13
Staff	14
Organizational Planning and Program Outcomes	15
Program Fees	15
HIPAA and Confidentiality of Records	15

Email and Texting Guidelines	18
Participant Rights and Responsibilities	19
Accessibility and Accommodation	21
Complaints	22
Effective Dates of Handbook	24
Appendix A: Self Sufficiency and Goodwill's Role	25
Appendix B: Complaint Report Form	26
Appendix C: Notice of Privacy Practices	28

Intake Topics (for more information, see page number provided)

Goodwill's Mission and Values (p. 7)

- Mission: Changing lives and communities through the power of work
- Values: Integrity, Stewardship, Innovation, Excellence, Respect

Service Options

- Intended objectives of program, duration of services, possible wait times
- Other services available (i.e. computer access, workshops, classes, etc)

Planning/Goals (p. 9-12)

- Goals: The plan that is written will be based on your opinions and ideas. You should give direction in all parts including changes and updates. If you don't understand something on your plan, the staff will explain it and/or change it. When/if you request a copy of your current or past plans, the staff will provide one.
- Expectations of you and staff
- Services are individualized based on information and feedback from you
- Exiting and/or ending services

Hours of service/Staff availability and communication (p. 18-19)

- Best ways to communicate, who to contact when your staff is not available, etc.
- If you would like to communicate via email or texting, Goodwill will use reasonable means to maintain

security of information, but there is always the risk for other sources to obtain the information being sent. Therefore, only include basic information in your messages, nothing personal such as medical information. You can always choose to no longer communicate via email or text, just let your staff know in writing.

Basic building safety

- Be aware of your environment and report any safety concerns
- Note posted evacuation routes and emergency procedures
- Tell staff if you get hurt while on Goodwill property

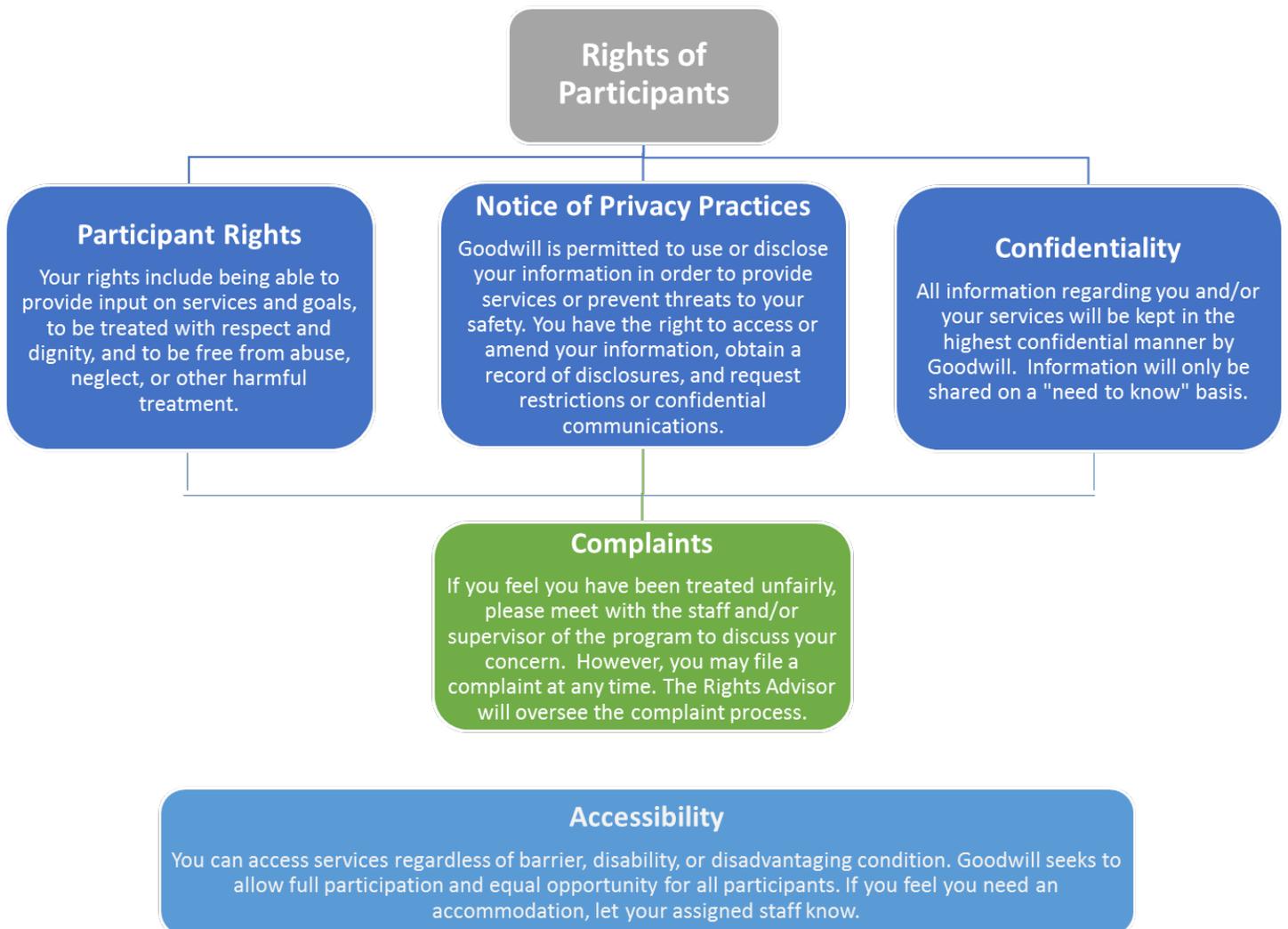
Emailing and Texting with Staff (p.18-19)

- Messages can be sent to unintended people
- Even deleted messages may still exist electronically
- Email and text should be used only for basic communication about services and community connections

Rights/Accessibility (p. 19-21)

- See visual on the next page

Rights/Accessibility (for more information, see pages 19-21)



PREFACE

This handbook was written to provide you with policies and procedures for services you may receive at Goodwill Industries of Greater Grand Rapids. In reading the handbook, you will see Goodwill Industries also referred to as Goodwill, GWI, or organization. In addition, “participant” refers to any person enrolled in a Goodwill program. The Participant Handbook presents basic information, services, privileges, and rules common to most programs at Goodwill Industries. However, due to the wide variety of programs at Goodwill Industries, this handbook is meant to be used as a general guide; for program-specific information, please see your primary staff member.

This Handbook is subject to change and shall be reissued to all participants as needed. Whenever you have a question, refer to this handbook for the answer. If you do not find the answer here, ask a staff member for assistance.

Welcome, Mission, Values

Welcome to services at Goodwill Industries, and thank you for participating!

The mission of Goodwill Industries of Greater Grand Rapids is **“Changing lives and communities through the power of work.”**

The team of staff members at Goodwill believe in the importance of person centered planning and services

tailored to meet individual needs, including a participant's ownership of his or her personal goals. Staff strive to assist individuals in reaching personal self-sufficiency (See Attachment A) and are aware of and partner with various community agencies for individuals' needs.

Our mission is achieved through applying the following values:

- Integrity
- Stewardship
- Innovation
- Excellence
- Respect

Goodwill is committed to making its culture as accepting as possible and values the differences of all people. This is done through education, awareness, trainings, surveys, events, and partnerships with other organizations in the community.

Goodwill Industries welcomes input from you and others assisting you. Your input helps us improve services, develop goals, and plan for future services. If you have suggestions about policies, procedures or services, please talk to a staff person or give your written suggestion to any staff person.

Goodwill History and Structure

Goodwill Industries began in 1901 as a movement in Boston, Massachusetts, by Edgar J. Helms, to assist poor and disadvantaged community members. The activities of the first Goodwill movement began with the collection of clothing and household items that were no longer needed, to be repaired and later resold. Rather than simply providing charity, Helms believed that people wanted to earn their way, so he taught them usable skills while repairing the donated items. He built services as a way to provide "...a hand up – not a hand out."

Currently, Goodwill Industries of Greater Grand Rapids, Inc. is a non-profit 501(c)(3) service organization that has been successfully providing a variety of services in Kent County to people with barriers to employment, since 1966. In the mid 1990's services expanded to the Northern region of our territory and includes Montcalm, Ionia, Isabella, Gratiot, Clare, Gladwin, Mecosta, and Osceola counties. Goodwill is an active member of Goodwill Industries International, which consists of over 160 member organizations throughout the United States and the world.

Program/Service Requirements and Expectations

A. Program Entrance Criteria and Order of Acceptance

Goodwill works with multiple referral and funding sources. Entrance criteria for some services are set by

the funding source and can not accept participants that do not meet the criteria.

Services that do not have entrance criteria set by the funder set their own criteria based on the services that are available and the best fit of the individual.

If you meet the entrance criteria, enrollment into programs occurs on a first come, first serve, basis. When needed, a waiting list is maintained and overseen by the program manager.

There is a minimum age requirement of 18 years of age for individuals seeking services. (Note: Select programs/services have lower age eligibility; your primary staff will inform you of the age requirement for the program/services you are requesting).

B. Medical Information/ Medication

You and other participants are asked to permit Goodwill Industries to obtain current medical and psychological information only if needed to better plan your services. This information is kept in strict confidence. Goodwill does not discriminate on the basis of disability or work options available. Goodwill complies with all Health Insurance Portability and Accountability Act (HIPAA) privacy requirements. In Appendix C of this handbook there is a copy of Goodwill's Notice of Privacy Practice regarding protected health information.

It is the policy of this organization NOT to hold, prescribe, dispense or administer prescription or over-

the-counter medications for its participants. Participants must be able to correctly self-administer medication or have qualified outside help available to do so during program hours.

C. Exiting Goodwill Programs and/or Services

You and your primary staff will discuss transition from services as you near the successful completion of services. This will include any referral or resource information that will be helpful in your continued success.

At the completion of services or once services end for any reason, your primary staff will complete a Final Report and Discharge Summary. This report includes an explanation of the services you received, your progress toward your goal, and recommendations for future services.

D. Reasons Your Services Could Be Terminated

Services can be suspended or terminated due to fighting, theft, carrying a weapon into any Goodwill location, possession of drugs, or reporting to services or working under the influence of drugs and/or alcohol. It is expected that you will treat Goodwill staff and other participants with respect. Also, services may end if you miss appointments/activities or show lack of participation.

Special Policy on the Relationship of Goodwill Staff and Participants

Staff members cannot become personally involved with you and/or other participants including, but not limited to; romantic relationships or friendships, performing favors, loaning or borrowing money, and/or otherwise maintaining a personal or professional relationship beyond Goodwill business and/or working hours, etc. Staff members are role models for you and other participants and are responsible to behave appropriately at all times. Should you believe your rights have been violated please bring this to the attention of your primary staff. If this staff person is the one whom you believe has violated your rights then ask the receptionist to see the Participant Rights Advisor or receive the number for the Goodwill Hotline 1 (866) 908-7230.

Employees of Goodwill are not allowed to accept gifts, and/or money from individuals receiving or who have received services. Nor may they receive gifts and/or money from those individual's family and/or friends. If you or a family member or friend would like, you may make a donation of either a gift or money to Goodwill in the name of that employee. You may contact Goodwill's Community Relations department at 616-532-4200.

Things You Need To Know

Personal Property: Goodwill is not responsible for lost or stolen property.

Bad Weather: If Goodwill Industries is to be closed due to bad weather, an announcement will be made on most local television stations and their websites.

Smoking: The Goodwill buildings are a smoke-free environment; designated smoking areas are provided at all locations.

Attendance: You are expected to notify your primary staff and/or training supervisor prior to your scheduled meeting time/shift if you expect to arrive late or are unable to attend meetings/trainings.

Conduct: All Goodwill facilities are professional workplaces. Each service area holds orientation where you will be given the rules and expectations. You will be expected to follow these rules and expectations to ensure safety and a professional environment.

Disclosure: Goodwill's practice is to avoid any potential conflict of interest. An example of a conflict of interest may be a staff member providing services to a relative or close friend or job placement information at a place of business owned by the relative of a staff person. If a conflict of interest is disclosed, Goodwill will take the necessary action to investigate and resolve the situation.

Staff

Goodwill is governed by a group of men and women from the service communities who are elected to the Board of Directors. They volunteer their time and do not receive payment for serving on the board. The Board hires a President for the organization and the President employs staff who assist in providing the various services Goodwill offers.

Goodwill consists of several departments that assist in supporting the delivery of services. Our focus is on providing services to achieve our mission, maintaining financial stability and environmental stewardship.

The practice of Goodwill Industries is to hire individuals who have a desire and an understanding of working with individuals who may have a disability and/or barriers to employment. Part of the hiring process is to conduct a background check in addition to reference checks on all potential staff. The staff holding these positions will possess a Bachelor's degree in a related field or the equivalent experience and a combination of experience and/or certifications.

Your primary staff coordinates services for you while at Goodwill and together you will create and continually update your goals pertaining to services. Goodwill staff will meet with you regularly throughout services. Primary staff are responsible for assuring compliance with program requirements, as well as confidentiality procedures and participant's preference.

Organizational Planning and Program Outcomes

Goodwill completes organizational Strategic Planning on a regular basis, including creating organizational goals and tactics to guide future business plans and services.

Goodwill provides information regarding the organization's goals, progress, performances and outcomes at all locations. The method used to relay the information varies and includes monitors in the main lobby, posting in the public areas/cafeterias, and the following website:
www.goodwillgr.org

Program Fees

In most cases the services you are receiving are being paid by your referral agencies. Many services that do not require a referral are free of charge. For those services that may require payment and there is not referral source, private pay may be an option. If you have any questions regarding payment of your services please contact your primary staff.

HIPAA and Confidentiality of Records

The nature of our business requires that you, your primary staff, and any other Goodwill staff providing services exercise the highest degree of confidentiality when dealing with matters involving you and/or other Goodwill participants. These confidentiality obligations are both legal and ethical and require your utmost consideration. All information regarding you and/or your services will be kept in the highest confidential manner by Goodwill. Only

information needed to provide you with services will be shared with other Goodwill staff on a “need to know” basis.

Health Insurance Portability and Accountability Act (HIPAA) Goodwill Industries complies with federal HIPAA regulations regarding individual privacy and confidentiality. Requests for access to and release of Protected Health Information (PHI) will be met within a reasonable amount of time, usually within 14 days.

In accordance with federal HIPAA standards, protected health information will not be disclosed without your permission with the following exceptions: in a medical emergency, for medication management, or as required by law. A signed consent allows Goodwill to use this information for the purposes of treatment, payment of services, and organizational operations.

This rule is to protect and enhance your rights and those of other persons applying for and/or receiving services, by establishing specific rights and procedures.

In order to be in compliance with Michigan law regarding a duty to warn, Goodwill Industries must give verbal or written information directly to the people involved and legal authorities where there is a clear and present danger to human life.

Goodwill values the privacy of all information regarding participants and their services within programming. Staff adhere to the strict code listed below and do not violate this code unless absolutely essential to the health and wellbeing of others.

Confidentiality of Records

1. Workforce Development staff of Goodwill Industries of Greater Grand Rapids, Inc. may have access to records on a “Need to Know Basis.”
2. You have the right to ask to see your record. You or your guardian (if you have one) may read or get a copy of your record or a part of it upon written request.
3. Goodwill Industries may be working in a partnership with other agencies in providing services. Referral agencies will be provided with information regarding your progress with your written permission. Files will be maintained regarding any participant on active status. At the end of services referral agencies may be given information about your services.
4. In order to be in compliance with Michigan Law regarding a duty to warn, Goodwill Industries must divulge verbal or written information directly to the people involved and legal authorities where there is a clear and present danger to human life.
5. Program and participant records are reviewed by auditors on a routine basis. The purpose of these audits is to ensure that Goodwill Industries meets all of the standards for quality service.
6. Group statistical data is sent regularly to various funding sources and partner organizations for ongoing planning and budget review. Individual names are not used in this process.
7. No other information is to be shared with anyone without your written permission.

Email and Texting Guidelines

Goodwill cannot guarantee but will use reasonable means to maintain security and confidentiality of e-mail and texted information sent and received.

Goodwill is not responsible for e-mail or text messages that are lost due to technical failure.

Risks:

- Messages can be sent to unintended people
- Even deleted messages may still exist electronically
- Employers and online service-providers have a right to inspect messages transmitted through their systems
- Messages can be intercepted, altered, or used without authorization or detection

Expectations:

- Email and texting should be between assigned Goodwill staff and the participant
- Emails and texts may be included as part of your record
- If an email or text is sent while the staff is out of the office, Goodwill staff will respond when they return
- Either you or your Goodwill staff can ask in writing (email or letter) to stop using email or texting as a form of communication at any time

Acceptable Use:

- Email and text should be used only for basic communication about services and community connections
- Examples: Questions about employment opportunities, reading ability for job fit, appointment scheduling, referral to resources in the community, etc.
- Email and text should never be used for transmitting sensitive personal information

- Examples: Results of a doctor's appointment, information regarding counseling or treatment, etc.

Participant Rights and Responsibilities

All Goodwill staff shall be familiar with Participants Rights and staff will explain these rights at intake. Goodwill has a Rights Advisor who is designated with the responsibility of assuring compliance with participant rights and the complaint procedure as implemented within the organization.

It is the responsibility of this organization to protect and promote your rights.

Goodwill does not participate in medical research studies but may release data for other studies. Data released does not contain any personal identifying characteristics.

At your intake into Goodwill programming, all services and procedures will be explained to you. This meeting may include others you wish to have present.

Staff will assist you and other participants with access or referral to legal assistance and/or advocacy group(s) outside of Goodwill upon request. This can include the referral source that brought you to Goodwill.

Your Rights

- You have the right to participate in the development of your own goals
- You have the right to receive a copy of your plan

- You have the right to update your goals and/or objectives upon request
- You have the right to review and get a copy of your records (If you request a copy of the information, we may charge a reasonable fee for the cost of copying, mailing, or other supplies associated with your request)
- You have the right to request a release of information
- Your service delivery team will consist of you, your Primary Staff and can include other Goodwill Staff and/or referral agency staff
- You have the right to be treated with respect and dignity
- You have the right to express your feelings, desires, and choices regarding your services and staff
- You have the right of freedom from abuse, neglect, financial or other exploitation, retaliation, and/or humiliation
- If you feel that any of these rights have been violated by any Goodwill staff and/or another participant, you may file a complaint. Any Goodwill staff can assist you in completing the Goodwill Industries Complaint form.
- If you desire external assistance, self- help, or advocacy (i.e. American Arbitration Associate) Goodwill will provide you with a referral list upon request.

- You have the right to be free from any retaliation from Goodwill staff and/or other participant if you file a complaint. All complaints are investigated and are reviewed annually to track trends and to assure that resolutions meet Goodwill's standards.
- You will maintain all existing rights, including Americans with Disabilities Act, legal, and non-discrimination

Your Responsibilities

- To tell program staff if there are changes in your address, telephone number, or employment.
- To treat Goodwill staff and other participants with respect.
- To attend all appointments and training as scheduled or notify program staff that you are not able to attend.

Accessibility and Accommodation

Goodwill is enthusiastic about helping participants access services regardless of barrier and seeks to allow full participation and equal opportunity for all participants, this includes people with disabilities or other disadvantaging conditions. If accommodations cannot be made, other individualized ways of overcoming barriers will be put in place. You will not be denied services based on your disability or accommodation needs.

Complaints

- a. *It is the responsibility of the Rights Advisor to accept and oversee the process of all complaints filed by you or another participant or another person or agency on your behalf (with your written consent). The Rights Advisor will assist you or your designee in filing the complaint. If necessary, the Rights Advisor will represent you and/or your designee at any of the complaint levels.*

- b. *Participant Rights and Complaints Forms and Procedures will be posted in organizational public areas. Copies of the Participant Rights will be given to you and other participants at the time of intake and annually if in services longer than one year.*

- c. *The Rights Advisor will confidentially maintain records of written complaints, including a copy of the documentation of the investigation and resolution of the complaint and a copy of the letter sent to you reflecting resolution of the complaint.*

- d. *On an annual basis, all complaints findings are reviewed by management to track trends, analyze areas that need improvement and evaluate actions taken.*

Complaint Report Procedure

You have the right to discuss any concern regarding your services with your primary staff member in an attempt to reach a resolution. If you feel the concern has not been resolved to your satisfaction, you may request a meeting

with the supervisor of the staff involved. If you still feel the concern has not been resolved, you may initiate a complaint by completing the top portion of the Complaint form (Appendix B) and turning it in to any Goodwill employee who will give it to the Participant Rights Advisor within 2 business days of receiving it. You also have the right to complete the Complaint form without first talking to any staff. There will be no consequence or retaliation by Goodwill Staff against any participant filing a complaint.

Once a complaint is received by the Participant Rights Advisor, within 2 business days, an investigation will begin and the participant and staff involved will be contacted. The following steps will occur:

- 1) The complaint and findings will be reviewed.
- 2) A meeting will be scheduled with all parties in hopes of reaching a resolution to the participant's satisfaction.
 - a. If the participant chooses not to meet with the staff, the Participant Rights Advisor will meet separately with all parties.
- 3) If the complaint is not resolved, it will be forwarded to the subsequent level of staff who will complete the above steps 1 and 2 within 2 business days of receiving the complaint and findings. The order of staff to receive the complaint, if not resolved at previous level, is:
 - a. Workforce Development Director
 - b. Chief Talent Development Officer
 - c. Vice President of Human Resources
 - d. External advocacy/self-help group(s) referral

The following will also occur in addition to the steps listed above:

1. The Participant Rights Advisor will keep the participant informed of where the complaint is in the process.
2. The complaint and findings will be logged and saved.
3. The complaint (along with all others received) will be reviewed on an annual basis to track trends and develop any future training for staff/employee in areas where consistent complaints may have been filed.
4. The Rights Advisor will record a summary of all interactions and decisions.

At any time during this process you may request external assistance or advocacy (i.e. American Arbitration Association at either www.adr.org or at 1-800-778-7879)

*If you need assistance in completing the form, you may designate a person of your choice to assist you, including your primary staff or Participant Rights Advisor.

Effective Dates of Handbook

This revised Participant Handbook is effective March 2015, and overrides all earlier participant handbooks.

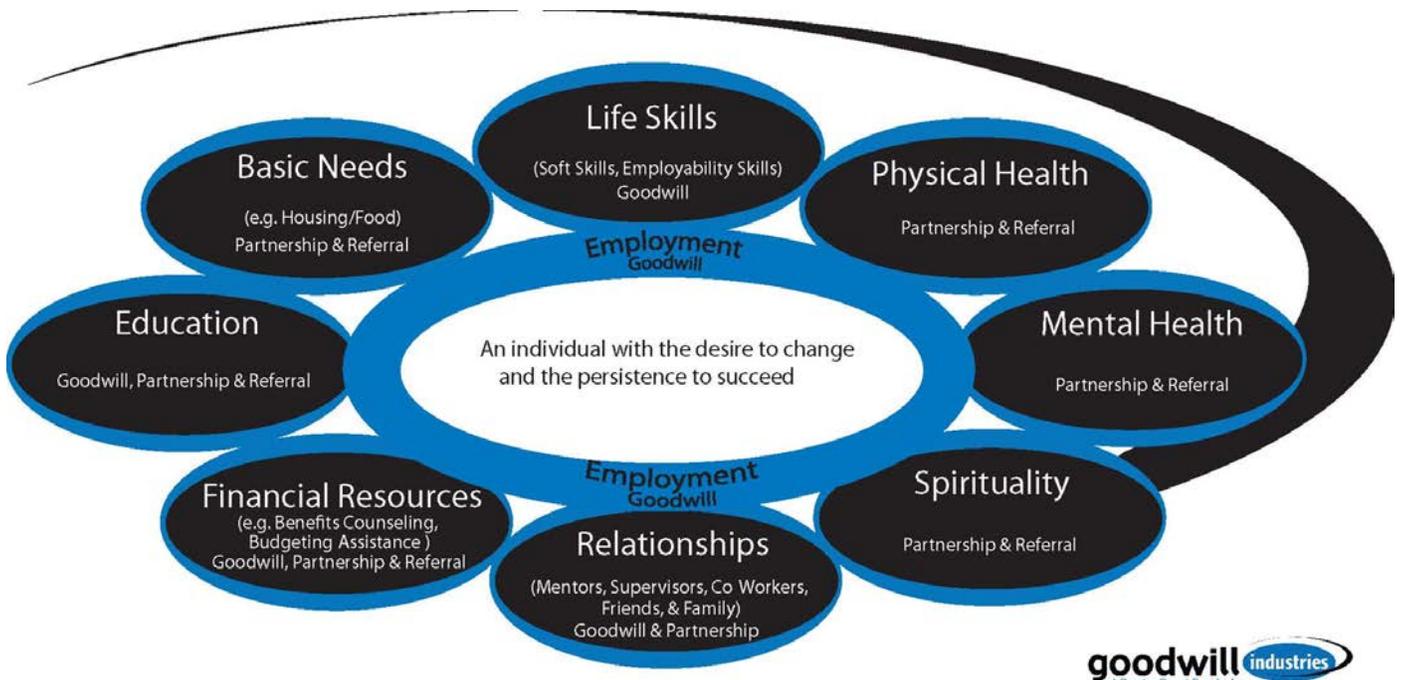
GWJ REVISED 12/89, 9/90, 5/92, 7/94, 11/94, 6/96, 12/97, 8/99, 10/99, 1/00, 4/00, 10/00, 3/01, 3/02, 7/02, 5/03, 11/06, 11/09, 1/10, 9/12, 3/15, 11/15

(A Spanish edition of this Handbook can be made available if requested. For participants who do not read written text, this information can be made available in a digital format.)

Appendix A

Self Sufficiency and Goodwill's Role

“Self Sufficiency is demonstrated by the desire to change one’s circumstances, the knowledge to access and use resources, the achievement of successful employment and the persistence to succeed. Collectively, these lead to attaining and maintaining the living standards each individual seeks.”



Appendix B

Goodwill Industries of Greater Grand Rapids, Inc Participant Complaint Form

I. What is the nature of the complaint? (This section is to be completed by the participant. If the participant requires assistance, please use the participant's exact words to describe complaint. If the participant has a guardian, they may assist them in completing this form). **Please include date, time and location of where the complaint originated. What happened that led to the complaint and any witness that might have seen what occurred.**

II. How would you like to see this complaint resolved?

Signature of Complainant or Guardian/Date

Signature of Witness (if not completed by complainant) / Date

This section to be completed by the Participant Rights Advisor

III. How was this complaint resolved? (Include name of staff taking actions and what actions were taken)

IV. Does the individual filing the complaint feel that the issue has been resolved to their satisfaction? YES _____

if NO, why not

V. Are there any other actions needed? YES _____ NO _____

Action to be Taken By Whom/When Date of Completion

Rights Advisor Signature/Date

Mission Services Manager/Director Signature/Date

Appendix C

Notice of Privacy Practices

THIS NOTICE DESCRIBES HOW INFORMATION ABOUT YOU MAY BE USED AND DISCLOSED, BY GOODWILL INDUSTRIES, AND HOW YOU CAN GET ACCESS TO THIS INFORMATION. PLEASE REVIEW IT CAREFULLY. This notice is being provided to you pursuant to the federal law known as the Health Insurance Portability and Accountability Act (“HIPAA”).

Who Will Follow This Notice

This notice describes the information practices of Goodwill Industries of Greater Grand Rapids, Inc. (Goodwill) which is the “covered entity”, and that of any third party that handles your protected information while assisting in the administration of Goodwill’s business operations. Goodwill’s processes have been amended to incorporate the requirements of this notice.

Our Pledge Regarding the uses and Disclosures of your Information

We understand that information about you and your health is personal. We are committed to protecting this information about you. We create a record of the services you receive, for preparing individual plans, checking progress and billing purposes. This notice applies to all of the records we maintain. This notice will tell you about the ways in which we may use and disclose information about you. It also describes our

obligations and your rights regarding the use and disclosure of information.

We are required by law to:

- make sure that information that identifies you is kept private;
- give you a copy of this notice or access to a copy and
- follow the terms of the notice that is currently in effect.

How We May Use and Disclose Information about You

The following categories describe different ways that we use and disclose information. For each category of uses or disclosures we will explain what we mean and present some examples. Not every use or disclosure in a category will be listed. However, all of the ways we are permitted to use and disclose information will fall within one of the categories.

For Providing Services. We may use or disclose information about you to facilitate services including medical care by providers. We may disclose information about you to providers, including case managers, involved in assisting you.

For Payment. We may use and disclose information about you to determine eligibility for benefits, to facilitate payment for the services you receive. For example, we may tell your case management provider about a need for personal adjustment counseling to learn if they will cover the service.

For Human Services Operations. We may use and disclose information about you for other operations. These uses and disclosures are necessary to run the

mission services of the business. For example, we may use information in connection with: conducting quality assessment and improvement activities; legal services, audit services, and fraud and abuse detection programs; business planning and development such as cost management; and business management and general administrative activities.

To Business Associates. We may contract with individuals and entities known as Business Associates to perform various functions or provide certain services. In order to perform these functions or provide these services, Business Associates may receive, create, maintain, use and/or disclose your information, but only after they sign an agreement with us requiring them to put in place appropriate safeguards to protect your information. For example, we may disclose your information to a Business Associate to provide support services, but only after the Business Associate enters into a Business Associate Agreement with us.

As Required by Law. We will disclose information about you when required to do so by federal, state or local law. For example, we must disclose information when required by a court order in a litigation proceeding.

To Avert a Serious Threat to Health or Safety. We may use and disclose information about you when necessary to prevent a serious threat to your health and safety or the health and safety of the public or another person. Any disclosure, however, would only be to someone able to help prevent the threat.

Special Situations

Military and Veterans. If you are a member of the armed forces, we may release medical information about you as required by military command authorities. We may also release medical information about foreign military personnel to the appropriate foreign military authority.

Workers' Compensation. We may release medical information about you for workers' compensation or similar programs. These programs provide benefits for work-related injuries or illnesses.

Public Health Risks. We may disclose medical information about you for public health activities, such as to prevent or control disease, injury or disability, report births and deaths, or to notify a person who may have been exposed to a disease or may be at risk for contracting or spreading a disease or condition.

Health Oversight Activities. We may disclose medical information to a health oversight agency for activities authorized by law. These oversight activities include, for example, audits, investigations, inspections, and licensure. These activities are necessary for the government to monitor the health care system, government programs, and compliance with civil rights laws.

Law Enforcement. We may release information if asked to do so by a law enforcement official:

- in response to a court order, subpoena, warrant, summons or similar process;

- to identify or locate a suspect, fugitive, material witness, or missing person;
- about the victim of a crime if, under certain limited circumstances, we are unable to obtain the person's agreement;
- about a death we believe may be the result of criminal conduct;
- about criminal conduct at Goodwill; and
- in emergency circumstances to report a crime; the location of the crime or victims; or the identity, description or location of the person who committed the crime.

Coroners, Medical Examiners and Funeral Directors. We may release medical information to a coroner or medical examiner. This may be necessary, for example, to identify a deceased person or determine the cause of death.

National Security and Intelligence Activities. We may release information about you to authorized federal officials for intelligence, counterintelligence, and other national security activities authorized by law.

Your Rights Regarding Information About You

You have the following rights regarding information we maintain about you:

Right to Access. You have the right to request access, from Goodwill or its business associates, to your protected information containing your records used to make decisions about your services. This includes the right to inspect the information in both electronic and paper systems. Also you have the right to a copy of the

information in your desired format (including paper and electronic). You must submit a request for access in writing to the Privacy Officer and we will respond to your request in no more than 30 days from the date of your written request. If you request a copy of the information, we may charge a reasonable fee for the costs of copying, mailing or other supplies associated with your request. We may deny your request to inspect and copy in certain circumstances. If you are denied access to this information, you may request that the denial be reviewed.

Right to Amend. If you feel that information we have about you is incorrect or incomplete, you may ask us, or our business associate, to amend the information. You have the right to request an amendment for as long as the information is kept by or for Goodwill. To request an amendment, your request must be made in writing and submitted to the Privacy Officer. In addition, you must provide a reason that supports your request. We may deny your request for an amendment if it is not in writing or does not include a reason to support the request. In addition, we may deny your request if you ask us to amend information that: is not part of the information kept by or for Goodwill. For example information in your record where Goodwill was not the original source.

- was not created by us, unless the person or entity that created the information is no longer available to make the amendment;
- is not part of the information which you would be permitted to inspect and copy; or
- is accurate and complete. Goodwill reserves the right to make an annotation for you in your record.

Right to an Accounting of Disclosures. You have the right to request, from Goodwill or its business associates, an “accounting of disclosures” of your protected information if the disclosure was made for any purpose other than providing services, payment, or business operations. To request this list or accounting of disclosures, you must submit your request in writing to the Privacy Officer. Your request must state a time period which may not be longer than six years previous to your request. Your request should indicate in what form you want the list (for example, paper or electronic). The first list you request within a 12 month period will be free. For additional lists, we may charge you for the reasonable costs of providing the list. We will notify you of the cost involved and you may choose to withdraw or modify your request at that time before any costs are incurred.

Right to Request Restrictions. You have the right to request a restriction or limitation on the medical and services information we use or disclose about you for providing services, payment or business operations. You also have the right to request a limit on the medical and services information we disclose about you to someone who is involved in your services or the payment for your services, like a family member or friend. For example, you could ask that we not use or disclose information about a functional assessment you had. We are not required to agree to your request if it adversely affect your services. If you pay for a service or health care item out-of-pocket in full, you can ask us not to share that information for the purpose of payment

or our operations with your health insurer. We will say “yes” unless a law requires us to share that information. To request restrictions, you must make your request in writing to the Privacy Officer. In your request, you must tell us (1) what information you want to limit; (2) whether you want to limit our use, disclosure or both; and (3) to whom you want the limits to apply, for example, disclosures to your spouse.

Right to Request Confidential Communications.

You have the right to request that we communicate with you about medical or other sensitive matters in a certain way or at a certain location. For example, you can ask that we only contact you at work or by mail. To request confidential communications, you must make your request in writing to the Privacy Officer. We will not ask you the reason for your request. We will accommodate all reasonable requests that do not substantially impede delivery of effective services. Your request must specify how or where you wish to be contacted.

Right to a Copy of this Notice. If you received this notice electronically, you have the right to a paper copy of this notice. You may ask us to give you a paper copy of this notice at any time. To obtain a paper copy of this notice, contact your Goodwill caseworker. A link on our Goodwill public website homepage (<http://www.goodwillgr.org>) is also available to view and/or download the latest version of this Notice.

Breach Notification Requirements

In the event unsecured protected information about you is compromised, we will notify you of the situation. We will also advise you of any steps you should take to protect yourself against potential harm due to the breach. We will also inform HHS and take any other steps to reduce further risk, including those as required by law.

Changes to this Notice

We reserve the right to change this notice. We reserve the right to make the revised or changed notice effective for information we already have about you as well as any information we receive in the future.

Other Uses of Information

Other uses and disclosures of your protected information not identified by this notice or the laws that apply to us will be made only with your written permission. For instance:

- **Fundraising** – Before we can contact you to raise funds, we must explain our intentions and inform you that you have the right to opt out of receiving such communications.
- **Marketing** – Uses and disclosures of your protected information for marketing and public relations purposes.
- **Psychotherapy** - Most uses and disclosures of psychotherapy notes if applicable to services provided to you and recorded by Goodwill.

- **Selling Information** – Disclosures that constitute a sale of your protected information. If you provide us permission to use or disclose information about you, you may revoke that permission, in writing, at any time. If you revoke your permission, we will no longer use or disclose protected information about you for the reasons covered by your written authorization. You understand that we are unable to take back any disclosures we have already made with your permission, and that we are required to retain our records of the services that we provided to you.

Complaints

If you believe your privacy rights have been violated, you may file a complaint with Goodwill, contact the Privacy Officer. All complaints must be submitted in writing. You will not be penalized for filing a complaint. You may also file a complaint with the Secretary of the U.S. Department of Health and Human Services.

Effective Date: This notice is effective Sept. 20, 2013

If you have any questions about this notice, please contact Goodwill and ask for our Privacy Officer at: 616-532-4200