

NOTICE OF PRIVACY PRACTICES
THRIVE CATALYST

Doug DiBrielle, LPCC (California)
Licensed Professional Clinical Counselor

Doug DiBrielle, LMHC (Massachusetts)
Licensed Mental Health Counselor

Effective Date: 06/01/2026

THIS NOTICE DESCRIBES HOW HEALTH INFORMATION ABOUT YOU MAY BE USED AND DISCLOSED, YOUR RIGHTS REGARDING THAT INFORMATION, AND HOW YOU MAY OBTAIN ACCESS TO IT. PLEASE REVIEW IT CAREFULLY.

SECTION 1. PRACTICE INFORMATION

Practice Name:
Thrive Catalyst

Provider:
Doug DiBrielle, LPCC
Doug DiBrielle, LMHC

California:
490 Post St., Suite 939
San Francisco, CA 94102
415-704-1814

Massachusetts (Mailing only):
185 Devonshire Street, Suite 500
Boston, MA 02110
617-429-6838

Email:
Doug@ThriveCatalyst.com

Website:
www.ThriveCatalyst.com

Privacy Contact:
Doug DiBrielle
Doug@ThriveCatalyst.com

SECTION 2. OUR COMMITMENT TO YOUR PRIVACY

Thrive Catalyst is committed to protecting the privacy and confidentiality of your health information.

As a licensed mental health professional, I create and maintain records regarding the care and services provided to you. These records may contain Protected Health Information ("PHI"), including mental health treatment information.

This Notice describes your rights and my legal duties under applicable federal and state laws, including:

- Health Insurance Portability and Accountability Act (HIPAA)
- Health Information Technology for Economic and Clinical Health Act (HITECH)
- California Confidentiality of Medical Information Act (CMIA)
- California behavioral health confidentiality laws
- Applicable Massachusetts confidentiality laws
- 42 CFR Part 2, when applicable
- Other applicable federal and state privacy laws

When state law provides greater privacy protection than HIPAA, Thrive Catalyst follows the more protective law.

Confidentiality and Its Limits

Communications between a client and therapist are confidential and protected by federal and state law.

Information will not be disclosed without your authorization except as permitted or required by law.

Exceptions to confidentiality may include:

- Threats of serious harm to yourself or others
- Suspected child abuse or neglect
- Suspected elder abuse or dependent adult abuse
- Court orders and lawful legal proceedings
- Licensing board investigations
- Regulatory oversight activities
- Public health or safety reporting obligations
- Other disclosures authorized or required by law

When disclosure is required or permitted, Thrive Catalyst will disclose only the information reasonably necessary to satisfy the applicable legal obligation.

SECTION 3. APPLICABLE STATE LAW AND MULTI-STATE PRACTICE

Thrive Catalyst provides professional psychotherapy services to clients located in jurisdictions where Doug DiBrielle is licensed and authorized to practice.

Because Thrive Catalyst operates across multiple states through telehealth, privacy rights, confidentiality protections, record access rights, and disclosure requirements may vary depending upon:

- The client's state of residence
- The state in which the client is physically located at the time services are provided
- The state law governing the professional services provided
- The nature of the health information involved

Federal privacy law, including HIPAA, establishes a baseline level of protection for health information.

Certain state laws, including California and Massachusetts laws governing mental health records and confidentiality, may provide protections beyond those required by HIPAA.

When state law provides greater privacy protection than federal law, Thrive Catalyst will generally apply the more protective standard as required by law.

Questions regarding the privacy rights applicable to a particular client's circumstances may be directed to the Privacy Contact identified in this Notice.

SECTION 4. HOW YOUR INFORMATION MAY BE USED AND DISCLOSED

Treatment

Your health information may be used and disclosed for purposes of providing treatment and coordinating care.

Examples include:

- Consultation with healthcare professionals involved in your care
- Referrals to other providers
- Continuity of care planning
- Professional consultation regarding treatment
- Coordination of services

Only information reasonably necessary for treatment purposes will be disclosed.

Payment

Thrive Catalyst is an out-of-network (OON) private-pay psychotherapy practice.

The practice does not bill insurance companies directly.

Upon request, clients may receive a superbill containing information necessary for submission to their insurance carrier for potential out-of-network reimbursement.

Information included on a superbill may include:

- Client identifying information
- Dates of service
- Diagnosis codes
- Procedure codes
- Provider information
- Fees paid

Once a client submits a superbill to an insurance company, the privacy practices of that insurance company govern its handling of the information.

Thrive Catalyst cannot guarantee reimbursement and does not control how insurers use, disclose, or maintain information submitted through reimbursement claims.

Health Care Operations

Information may be used for legitimate healthcare operations, including:

- Quality improvement
- Compliance activities
- Risk management
- Professional consultation
- Practice management
- Accounting and legal services
- Auditing and oversight activities

Whenever possible, only the minimum necessary information will be used or disclosed.

SECTION 5. USES AND DISCLOSURES REQUIRING AUTHORIZATION

Except as otherwise permitted or required by law, Thrive Catalyst will obtain your written authorization before using or disclosing your information.

Examples include:

- Releases to attorneys
- Releases to employers
- Releases to family members

- Most disclosures outside treatment, payment, and healthcare operations
- Marketing activities requiring authorization

You may revoke an authorization at any time in writing except to the extent action has already been taken in reliance upon it.

SECTION 6. PSYCHOTHERAPY NOTES

Psychotherapy notes receive special protection under federal and California law.

If psychotherapy notes are maintained separately from the clinical record, they generally will not be disclosed without your separate written authorization except where specifically permitted or required by law.

SECTION 7. SUBSTANCE USE DISORDER RECORDS (42 CFR PART 2)

Certain substance use disorder treatment records may be protected by federal law, including 42 CFR Part 2.

When applicable, these records may receive protections beyond those provided by HIPAA.

Where required by law, Thrive Catalyst will obtain appropriate consent before using or disclosing substance use disorder treatment records.

Certain redisclosures may be prohibited or restricted by federal law.

Patients may have additional rights regarding these records, including rights concerning consent, restrictions on disclosure, and accounting of disclosures.

SECTION 8. REPRODUCTIVE HEALTH INFORMATION

Federal law provides special protections for information related to lawful reproductive health care.

Thrive Catalyst will not use or disclose reproductive health information in circumstances prohibited by applicable federal law.

Certain requests for reproductive health information may require additional legal review, documentation, or attestation before disclosure.

SECTION 9. DISCLOSURES REQUIRED OR PERMITTED BY LAW

Threats of Serious Harm

Information may be disclosed when necessary to prevent or lessen a serious threat to the health or safety of a client or another person.

Consistent with California and Massachusetts law, disclosures may be made to:

- Potential victims
- Law enforcement
- Family members

- Persons reasonably able to prevent or lessen the threat

Child Abuse and Neglect

Known or reasonably suspected child abuse or neglect must be reported as required by law.

Elder and Dependent Adult Abuse

Known or reasonably suspected abuse, neglect, abandonment, isolation, exploitation, or financial abuse of elders or dependent adults must be reported as required by law.

Court Orders and Legal Proceedings

Information may be disclosed when required by:

- Court orders
- Judicial proceedings
- Administrative proceedings
- Certain subpoenas
- Other lawful legal processes

Whenever possible, Thrive Catalyst will seek to protect confidentiality to the fullest extent permitted by law.

Professional Licensing and Regulatory Oversight

Information may be disclosed when required by professional licensing boards, governmental agencies, accreditation bodies, courts, or other authorities acting within their lawful authority.

Examples include:

- Massachusetts Board of Registration of Allied Mental Health and Human Services Professions
- California Board of Behavioral Sciences
- U.S. Department of Health and Human Services
- Other governmental agencies with lawful authority

Disclosures will be limited to the information reasonably necessary to satisfy legal or regulatory requirements.

Public Health and Regulatory Activities

Information may be disclosed as required for public health reporting, licensing, audits, investigations, oversight activities, and regulatory compliance.

Law Enforcement

Information may be disclosed when required or authorized by law.

Workers' Compensation

Information may be disclosed as authorized by applicable workers' compensation laws.

SECTION 10. TELEHEALTH SERVICES

All psychotherapy services offered through Thrive Catalyst are provided through telehealth unless otherwise specified in writing. Clients are responsible for participating from a private location and for informing you of their physical location at the start of each session.

Telehealth services may include:

- Secure video conferencing
- Electronic communications
- Secure messaging
- Electronic scheduling
- Electronic billing

Reasonable administrative, technical, and physical safeguards are used to protect the confidentiality and security of electronic health information.

SECTION 11. SIMPLEPRACTICE AND ELECTRONIC HEALTH RECORDS

Thrive Catalyst utilizes SimplePractice and related business associates for electronic health record management, scheduling, secure communications, telehealth services, billing support, and clinical documentation.

Clinical records maintained by Thrive Catalyst may include:

- Demographic information
- Contact information
- Intake documentation
- Informed consent documents
- Clinical assessments
- Treatment plans
- Progress notes
- Communications related to treatment
- Billing and payment records
- Telehealth documentation
- Clinical correspondence

- Other information reasonably necessary to provide professional services

Business Associate Agreements are maintained with vendors where required by federal law.

Electronic records are maintained in accordance with applicable federal and state privacy and security requirements.

SECTION 12. AI-ASSISTED DOCUMENTATION

Thrive Catalyst utilizes AI-assisted documentation technology integrated within the SimplePractice electronic health record platform.

AI-assisted tools may assist in generating draft clinical documentation, summaries, and related administrative materials based upon information obtained during psychotherapy sessions.

These technologies are utilized solely to support administrative and documentation functions and do not provide psychotherapy services, diagnosis, treatment recommendations, clinical judgment, or independent decision-making.

All documentation generated with AI assistance is reviewed, edited as necessary, and approved by Doug DiBrielle before becoming part of the clinical record.

The therapist remains solely responsible for all clinical decisions, diagnoses, treatment planning, documentation, and professional services.

Technology vendors receiving access to protected health information are required to maintain appropriate privacy and security safeguards and, where required by law, operate under Business Associate Agreements.

Clients will be informed of the practice's use of AI-assisted documentation technologies during the informed consent process and may request additional information regarding these technologies and associated privacy protections.

SECTION 13. ELECTRONIC STORAGE AND PROCESSING OF INFORMATION

Protected health information maintained by Thrive Catalyst may be stored, transmitted, processed, or backed up through secure electronic systems utilized by the practice and its contracted service providers.

Reasonable administrative, technical, and physical safeguards are maintained to protect information from unauthorized access, use, alteration, loss, or disclosure.

While no electronic system can guarantee absolute security, Thrive Catalyst takes reasonable and appropriate steps to protect the confidentiality, integrity, and availability of electronic health information.

SECTION 14. EMAIL, TEXT MESSAGE, AND ELECTRONIC COMMUNICATIONS

Communication with clients may occur through:

- Secure Client Portal messaging

- Secure telehealth platforms
- Email
- Text messaging
- Telephone
- Administrative communications regarding scheduling, billing, and practice operations

Although reasonable safeguards are utilized, electronic communications may involve some degree of privacy risk.

Clients may request alternative communication methods or communication restrictions at any time.

Thrive Catalyst will make reasonable efforts to accommodate such requests when feasible and legally permissible.

SECTION 15. ADULT CLIENTS ONLY

Thrive Catalyst provides psychotherapy services exclusively to adults age eighteen (18) and older.

The practice does not provide psychotherapy services to minors in California or Massachusetts.

Because the practice does not provide services to minors, this Notice does not address privacy rights or parental access provisions applicable to minor clients except where disclosure obligations arise under applicable law.

SECTION 16. YOUR RIGHTS

You have the following rights regarding your protected health information, subject to limitations established by federal and state law.

Right to Inspect and Obtain Copies

You have the right to request access to records maintained by Thrive Catalyst and to obtain copies of records as permitted by law.

I will provide you with a copy of your record, or a summary of it, if you agree to receive a summary, within 30 days of receiving your written request, and I may charge a reasonable, cost-based fee for doing so.

Right to Request Amendments

If you believe information maintained in your record is inaccurate or incomplete, you may request that the record be amended.

Thrive Catalyst may deny amendment requests under circumstances permitted by law.

Right to Request Restrictions

You have the right to request restrictions on certain uses and disclosures of your information.

While not all requested restrictions can be accommodated, Thrive Catalyst will consider reasonable requests and comply with restrictions when required by law.

Right to Request Confidential Communications

You have the right to request that communications be sent through alternative means or to alternative locations.

Examples may include:

- Alternate email addresses
- Alternate mailing addresses
- Alternate telephone numbers
- Requests to avoid certain communication methods

Right to an Accounting of Disclosures

You may request an accounting of certain disclosures of your protected health information made by Thrive Catalyst, subject to applicable legal limitations.

Right to Receive Notice of a Breach

You have the right to receive notification if a breach of unsecured protected health information occurs and notification is required by law.

Right to Receive a Paper Copy of This Notice

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

SECTION 17. CLIENT ACCESS TO RECORDS

Upon written request, clients may inspect or obtain copies of records maintained by Thrive Catalyst, subject to applicable federal and state law.

In limited circumstances permitted by law, direct access to portions of a record may be restricted if, in the professional judgment of the therapist, access could reasonably be expected to endanger the life, physical safety, or emotional well-being of the client or another person.

When permitted by law, a treatment summary may be provided in place of direct access to portions of a record.

Clients may designate an attorney, licensed mental health professional, physician, or other authorized representative to receive records on their behalf where permitted by law.

Reasonable fees may be charged for copying, preparation, transmission, or summaries where permitted by applicable law.

SECTION 18. RECORD RETENTION

Thrive Catalyst maintains treatment records in accordance with applicable federal and state laws, professional standards, and regulatory requirements.

Adult client records are retained for a minimum of seven (7) years following the last professional contact with the practice or for such longer period as may be required by law.

Records may be maintained in electronic form and may be securely archived or destroyed following expiration of applicable retention periods.

SECTION 19. BREACH NOTIFICATION

If a breach of unsecured protected health information occurs, notification will be provided as required by applicable federal and state law.

Notification may include:

- A description of the breach
- The information involved
- Steps clients may take to protect themselves
- Actions taken by Thrive Catalyst in response to the breach
- Contact information for obtaining additional information

SECTION 20. COMPLAINTS

If you believe your privacy rights have been violated, you may file a complaint without fear of retaliation.

Complaints may be submitted directly to:

Doug DiBrielle
Thrive Catalyst
490 Post Street, Suite 939
San Francisco, CA 94102

Doug@ThriveCatalyst.com

You may also file complaints with:

U.S. Department of Health and Human Services
Office for Civil Rights

California Board of Behavioral Sciences

Massachusetts Board of Registration of Allied Mental Health and Human Services Professions

Filing a complaint will not affect your care, treatment, services, or relationship with Thrive Catalyst.

SECTION 21. CHANGES TO THIS NOTICE

Thrive Catalyst reserves the right to revise this Notice and to make revised provisions effective for all protected health information maintained by the practice.

If material changes are made, the revised Notice will be made available through the client portal, website, electronic communication, or upon request.

The effective date of the current Notice will appear on the first page of the document.

SECTION 22. ACKNOWLEDGMENT OF RECEIPT

Provider:

Doug DiBrielle, LPCC
California Licensed Professional Clinical Counselor

Doug DiBrielle, LMHC
Massachusetts Licensed Mental Health Counselor

I acknowledge that I have received or been offered a copy of the Thrive Catalyst Notice of Privacy Practices.