

# SANKOFA FAMILY MEDICINE

*Medicine That Remembers*

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## Notice of Privacy Practices

*Washington State Addendum*

**Effective Date:** December 20, 2025

### 1. Purpose

This addendum supplements Sankofa Family Medicine's Notice of Privacy Practices ("NPP") to address additional patient rights and protections under Washington State law. This addendum should be read together with the main NPP.

### 2. Washington State Legal Authority

In addition to the federal Health Insurance Portability and Accountability Act ("HIPAA") and the Health Information Technology for Economic and Clinical Health Act ("HITECH"), Sankofa Family Medicine complies with the following Washington State laws:

- **Washington Uniform Health Care Information Act ("UHCIA")** - Revised Code of Washington ("RCW") Chapter 70.02
- **Washington Telemedicine Law** - RCW 48.43.735 and RCW 70.41.020
- **Washington My Health My Data Act** - RCW Chapter 19.373 (consumer health data protections)
- **Washington State Prescription Drug Monitoring Program** - RCW 70.225 (PMP AWARe system)

### 3. Enhanced Patient Rights Under Washington Law

#### 3.1 Right to Access Health Care Information

Under RCW 70.02.080, you have the right to inspect and obtain copies of your health care information. Key provisions include:

- **Timeline:** We will respond to your request within fifteen (15) working days, which may be shorter than the federal thirty (30) day standard.
- **Format:** You may request records in electronic format if we maintain them electronically.
- **Fees:** We may charge reasonable costs for copying, not to exceed the amounts specified in RCW 70.02.010.

#### 3.2 Special Protections for Sensitive Information

Washington law provides enhanced protections for certain categories of health information:

- **Mental Health Records:** Additional authorization requirements under RCW 70.02.230
- **Substance Use Disorder Records:** Protected under both federal 42 Code of Federal Regulations ("CFR") Part 2 and Washington State law

- **Human Immunodeficiency Virus/Acquired Immunodeficiency Syndrome ("HIV/AIDS") Information:** Special consent requirements under RCW 70.24
- **Reproductive Health Information:** Protected under Washington's Shield Law provisions
- **Genetic Information:** Additional protections under RCW 70.02.045

### 3.3 Minor Consent and Confidentiality

Under Washington law, minors may consent to certain health care services without parental involvement, and information related to those services may be protected from parental access:

- Reproductive health services (age 13 and older)
- Outpatient mental health services (age 13 and older)
- Sexually transmitted infection ("STI") testing and treatment (age 14 and older)
- Substance use disorder services (age 13 and older)

## 4. Telehealth-Specific Privacy Provisions

As a virtual-first clinic operating under Washington's telemedicine laws, we implement additional privacy protections for telehealth encounters:

- **Recording Consent:** Washington is a two-party consent state. We will not record any telehealth session without your explicit consent.
- **Location Verification:** We verify your physical location at each encounter to ensure compliance with applicable state laws.
- **Platform Security:** All telehealth platforms meet HIPAA security requirements and use end-to-end encryption.

## 5. Filing a Complaint

If you believe your privacy rights have been violated under Washington State law, you may file a complaint with:

- **Sankofa Family Medicine Privacy Officer**  
Yaw A. Nkrumah, MD  
Phone: (425) 285-7390  
Email: [privacy@sankofafamilymedicine.com](mailto:privacy@sankofafamilymedicine.com)
- **Washington State Attorney General**  
Consumer Protection Division  
800 Fifth Avenue, Suite 2000, Seattle, WA 98104  
Phone: (800) 551-4636
- **United States Department of Health and Human Services ("HHS")**  
Office for Civil Rights  
Website: [hhs.gov/hipaa/filing-a-complaint](https://hhs.gov/hipaa/filing-a-complaint)

## 6. Document Control

**Version:** 1.0

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**Approved By:** Yaw A. Nkrumah, MD, Medical Director

**Review Frequency:** Annual or upon regulatory change

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