

HIPAA: Notice of Privacy Practices

Notice of Privacy Practices

Notice of Privacy Practices (NPP) is revised periodically. This document must be given to each new patient at the first in person or electronic provision of service. Procedures for distributing this to patients will vary by service area; check with your supervisor for how this is being handled.

The NPP must be given to patients with whom we have a direct treatment relationship. This means that we interact directly with the patient about their care. So, a physician who sees a patient has a direct treatment relationship. A lab that performs tests and reports the results to the ordering physician (rather than directly to the patient) is referred to as an indirect treatment provider. The indirect providers have to provide the NPP on the request.

The NPP describes what is permitted and what we actually do with patient information in the course of treatment, payment, and health care operations. The NPP is designed to educate our patients about how their health information is used and disclosed at OHSU.

So, suppose a new patient presents to an ambulatory practice or to Admitting for care. She will be given a NPP and asked to sign an acknowledgement that she has received it. This acknowledgement must be scanned into Epic by Health Information Services and documented in Epic in the documents table.

This acknowledgement only needs to be obtained ONCE from a patient.

Some commonly asked questions about the NPP are:

Where can I find the Notice of Privacy Practices?

Check with your supervisor to locate if your area has printed copies available to distribute. The most recent version is also posted on the Integrity web site at <http://www.ohsu.edu/xd/about/services/integrity/policies/upload/Notice-of-Privacy-Practices-English.pdf>. The NPP is also part of the footer of every primary OHSU web page. Finally, poster-sized versions of the NPP will be displayed in key clinical care areas. The Acknowledgement form can also be ordered from Realizon, and is posted on the web at <http://ozone.ohsu.edu/healthsystem/HIS/mr4636.pdf>

What if someone who is not a patient asks for a copy of the NPP?

We are required to provide a copy to anyone who asks for it. We are not required to document this if the recipient is not an OHSU patient.

Will the NPP be available in multiple languages?

Yes. The NPP will be available in English, Spanish, Vietnamese, Chinese, and Russian. These versions are posted on the Integrity web site at <http://www.ohsu.edu/xd/about/services/integrity/policies/ips-policies-hipaa-forms.cfm#results>

What if a patient arrives and is unconscious or otherwise unable to sign an NPP acknowledgment form?

We are not required to obtain acknowledgement under emergency circumstances. However, we should attempt to do so after providing the NPP to the patient at the first reasonable opportunity after things have settled down and the patient has been stabilized.

What about minors?

An NPP and an acknowledgement form should be given to the parent or legal representative of a minor. If a parent arrives with three children who will be treated, you may provide one NPP, but the parent should sign an acknowledgement form for each of the three children which then is scanned into each minor's medical record.

**What if a patient refuses to sign the acknowledgement form?
Should we refuse to treat them?**

No. HIPAA says that we must make a good faith effort to obtain the patient's acknowledgement that they received the NPP. If we are unable to do so, we must document why using the "pull down list" in the documents table in Epic, but may still treat the patient.

What if patients have questions about the NPP?

A phone number is provided on the last page of the document. If you cannot answer a patient's questions, refer them to that number.