

**UNIVERSITY OF KANSAS
WATKINS HEALTH SERVICES
ADMINISTRATION**

NUMBER: AD-324	ISSUE DATE: 02/2003
TITLE: NOTICE OF PRIVACY PRACTICES	REVISED: 8/1/2016; 8/22/18
TITLE OF OWNER: Director	APPROVED: Director

PURPOSE: To facilitate the patient’s right to receive the Notice of Privacy Practices (NPP) in compliance with the Privacy Rule of the Health Insurance Portability and Accountability Act (HIPAA).

POLICY:

NPP Content: The NPP must be written in plain language and must include, at a minimum:

- The header “THIS NOTICE DESCRIBES HOW MEDICAL INFORMATION ABOUT YOU MAY BE USED AND DISCLOSED AND HOW TO GET ACCESS TO THIS INFORMATION, PLEASE REVIEW IT CAREFULLY.”
- A description, including at least one example of the types of disclosures WHS is permitted to make for treatment, payment and healthcare operations.
- A description of each of the other purposes when WHS is permitted or required to use or disclose information with patient’s consent or authorization.
- A statement that other uses or disclosures will be made only with patient’s written authorization and patient’s right to revoke the authorization.
- The patient’s right to access protected health information (PHI), request to amend PHI, request confidential communications, receive an accounting of disclosures, request restrictions on certain uses/disclosure of PHI and obtain a copy of the NPP.
- A statement that WHS is required by law to maintain the privacy of PHI and to provide and abide by the NPP.
- A statement that WHS may change NPP and that the change will apply to future PHI and how any change will be communicated.
- A statement that patients may complain to WHS Privacy Official, KU-Lawrence Campus Privacy Official and the Secretary of Health & Human Services, including a description of how to file a complaint and a statement that the patient will not be retaliated against for filing the complaint.

NPP Delivery:

1. The NPP will be provided to the patient for acknowledgment no later than the first date of service. For recurring patients, this delivery only needs to occur once.
2. If the patient schedules an appointment on the WHS website patient portal, the NPP must be completed before the appointment scheduling can be finalized.
3. If the patient schedules an appointment by phone or in person, the NPP must be completed when the patient checks in for their appointment at the self-check-in kiosks or at the Registration desk.
4. A paper copy of the NPP will be given the any patient upon request.

NUMBER: AD-324	TITLE: Notice of Privacy Practices
--------------------------	--

NPP Acknowledgement

1. Except in an emergency treatment situation, WHS will make a good faith effort to obtain the written acknowledgement of the NPP (see form: *Consent for the Use or Disclosure of Health Information for Treatment, Payment or Healthcare Operations*).
2. If written acknowledgement cannot be obtained, the good faith effort must be documented in the medical record. The patient must be informed that treatment information will not be disclosed and payment information cannot be sent out to third parties for payment.
3. In an emergency treatment situation, the NPP should be delivered and the written acknowledgement obtained as soon as reasonably possible.

NPP Revisions

1. All revisions must be approved by the KU-Lawrence Campus Privacy Official prior to implementation.
2. WHS must revise the NPP to reflect material changes in privacy practices.
3. WHS will post any NPP updated version on the website and on the self-check-in kiosks and at the Registration desk.
4. It is not necessary for returning patients to sign another consent each time the NPP is revised.

Documentation

1. The signed consent (and documentation of good faith efforts) will be posted in the patient's medical record.
2. WHS must retain copies of all versions of the NPP issued.

REFERENCES:

This document is on file with the KU Policy Library.