

Health Information Compliance Alert

Reader Question: Do BAs Need To Have HIPAA NPPs?

Question: Does a business associate (BA) need to have a HIPAA Notice of Privacy Practices (NPP)?

Answer: BAs don't necessarily need to have a HIPAA NPP, answers **Jim Sheldon-Dean**, founder and director of compliance services for **Lewis Creek Systems, LLC** in Charlotte, VT. But BAs may be responsible for participating in and maintaining an NPP if they are providing those kinds of front line services for their covered entity (CE).

Meaning: If the CE hires the BA to manage the front desk and/or sign up new patients or gather contact information, the BA may be responsible for managing that NPP and distributing the NPP to the patients, Sheldon-Dean says. But BAs wouldn't have an NPP of their own for their own operations.