

Health Information Compliance Alert

Reader Question: When Must You Send Out Updated NPPs?

Question: Our office is updating our Notice of Privacy Practices (NPP) to include the new patient rights under HIPAA. Will we need to re-issue our NPP to every one of our patients once we update it?

Answer: Generally, no, you don't need to give out a copy of your updated NPP to everybody who's received the old NPP already, says **Jim Sheldon-Dean**, owner and director of compliance services for **Lewis Creek Systems LLC** in Charlotte, VT. But you must give one to any patient who wants to receive a copy of the updated NPP — no matter whether the patient received the old NPP or any other version of the document.

Scenario: Think about a situation where a patient visits the physician for one particular episode, at one specific point in time, and then he's not really your patient anymore, Sheldon-Dean notes. "It wouldn't make sense to send out an NPP to somebody who may not even be involved with that [physician] anymore."

Instead, just begin using the new NPP and recycle the old copies while you hand out the new ones, Sheldon-Dean advises. "And make sure you have the new one posted properly on the wall in your office and also on your website if you have a website as well."

Caveat: Remember that health plans do have an obligation to send out an updated NPP, because that is an active relationship, Sheldon-Dean notes. So health plans must send out any change to their NPP within six months of making that change.