

Health Information Compliance Alert

Reader Questions: A News-Worthy Notice

Question:

We have revised our notice of privacy practices (NPP). Do our patients need to sign it again? What is the best way to distribute it?

Answer:

"You do not have to resend the notice of privacy practices to your patients," counsels **Brian Gradle**, an attorney with **Hogan & Hartson** in Washington, DC. You do need to ask your patients to acknowledge that you apprised them of the changes by signing the revised notice, he says.

Remember: As with the original NPP, your patients do not have to provide their signatures. But, you do have to document that you made an effort to obtain their written acknowledgement. Without documentation, you cannot prove that patients are aware of your modifications.

The Bottom Line: While you don't have to mail the revised notice, you do have to distribute it. You must "make it available upon patient request, post it on your Web site and have copies of it for patients to take away with them," Gradle says.