

## Health Information Compliance Alert

### Reader Questions: Hit The Road With HIPAA

Question: Our doctors and nurses would like to start a mobile health outreach program to provide free physicals and sight screenings to uninsured members of our community. Would this service be covered by the privacy rule?

Answer: "Yes," affirms **Brian Gradle**, an attorney with Washington, DC-based **Hogan & Hartson**.

Good to know: Hybrid entities can work around the privacy rule's demands by running any outreach programs under the non-healthcare component, Gradle notes. Otherwise, your staff must follow the same procedures on the road that they do in the office, he states, including providing a notice of privacy practices (NPP) to all the program's participants.

Strategy: Save time and money by creating an NPP that applies only to the health mobile's operations, Gradle suggests. Or, keep one NPP on hand for patients to read and ask them to sign a separate acknowledgement. Hold on to your notice, but tell participants how they can get their own copy, he recommends.

The Bottom Line: Your staff must protect patients' privacy on the road, Gradle notes. Make sure your procedures for protecting information gathered during mobile health screenings match those in your office, he says.