

**County of San Bernardino
Department of Behavioral Health**

HIPAA Notice of Privacy Practices (NOPP) Policy

Effective Date 5/2004
Revision Date 9/20/13

CaSonya Thomas, Director

Policy It is the policy of the Department of Behavioral Health (DBH) to provide all clients with the HIPAA [Notice of Privacy Practices](#) handout ([Spanish](#)), in accordance with the HIPAA *Standards for Privacy of Individually Identifiable Health Information* (Privacy Rule).

Purpose To ensure DBH clients are informed of their privacy rights, and to guarantee compliance with the Privacy Rule.

Notice of Privacy Practices (NOPP) The Notice of Privacy Practices (NOPP) describes how medical information is used and disclosed. It lists client rights regarding protected health information (PHI), as well as legal duties of DBH with regard to PHI. This notice contains an [Acknowledgement of Receipt of Notice of Privacy Practices form](#) that the client is to fill out, sign, and return to DBH.

Note: NOPP can be found on the Department's intranet and internet sites.

Issuance and Acknowledgement of NOPP

The following are actions to be taken depending on client status:

Client Status	DBH Obligations
New or Returning (has not been seen since before September 23, 2013)	<ul style="list-style-type: none"> • Provide the client with the HIPAA Notice of Privacy Practices handout no later than the first date of service • Obtain a signed copy of the Acknowledgement of Receipt of Notice of Privacy Practices form • File the acknowledgement form in the client's chart under legal section
Emergency	<ul style="list-style-type: none"> • Provide the client with the HIPAA Notice of Privacy Practices handout as soon as client is stable • Obtain a signed copy of the Acknowledgement of Receipt of Notice of Privacy Practices form • File the acknowledgement form in client's chart under legal section

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HIPAA Notice of Privacy Practices (NOPP) Policy, Continued

Issuance and Acknowledgement of NOPP
(continued)

Client Status	DBH Obligations
Client requests a paper copy	DBH staff will provide a paper copy of the NOPP.

Important: In circumstances when the client refuses to sign the acknowledgement, or signature cannot be obtained, all efforts to obtain a signature must be documented, including the reason for not obtaining a signature.

Requirements

The following are requirements of all DBH clinics and service delivery sites:

- Keep NOPP available at front desk
- Post current NOPP in a prominent location where clients are able to see and read notice
- Replace NOPP with revised versions promptly on effective date

Note: Copies of the NOPP and each subsequent revision are to be permanently kept on file by the Office of Compliance.

Reference

Code of Federal Regulations, Title 45, Section 160-164
U.S. Department of Health and Human Services, Office of Civil Rights,
[Federal Registry](#) – Final Rule