

Memo

Date: February 11, 2026

To: All Alameda County Behavioral Health Department (ACBHD) Contracted Organizational Providers and Mental Health Individual Providers

From: Torfeh Rejali, Quality Assurance (QA) Division Director *Torfeh Rejali*

Subject: Updates to Informing Materials, Member Handbook and Notice of Privacy Practices

The purpose of this memo is to notify providers of changes to the *ACBHD Informing Materials Packet*, *Member Handbook* and *Notice of Privacy Practices*. Member notification and signatures are required.

Background

To improve health care outcomes and experiences of Medi-Cal members, the Department of Health Care Services (DHCS) requires Medi-Cal behavioral health delivery systems to develop and distribute *Integrated Member Handbooks*.¹

Additionally, health plans are required by law to maintain the privacy of health information and to inform members about how their health information may be used, disclosed and accessed.

Elimination of the *ACBHD Informing Material Packet*

To minimize administrative burden for providers and simplify the member experience when accessing behavioral health services, ACBHD is sunsetting the *ACBHD Informing Materials Packet*. This packet was created prior to the availability of the DHCS *Member Handbook*. As the information in the two documents is the same, the use of the *ACBHD Informing Materials Packet* has become duplicative and is no longer necessary.

The Quality Assurance (QA) [Informing Materials webpage](#) has been updated to reflect this change. It also includes links to Informing Materials that must be offered to members or their authorized representatives at Intake, when there are significant changes to the content and upon request. These include:

- Integrated Member Handbook
- Advance Directive Educational Material
- Provider Directory
- Other Consent Forms, as appropriate
- Notice of Privacy Practices (also embedded in the Integrated Member Handbook)
- Acknowledgement of Receipt and Consent to Services Signature Page

¹ [BHIN 25-042](#)

Updated Integrated Member Handbook

Effective February 1, 2026, the *Integrated Member Handbook* was updated with the following:

- Information about the following service offerings:
 - Multisystemic Therapy (MST)
 - Assertive Community Treatment (ACT)
 - Forensic Assertive Community Treatment (FACT)
 - Coordinated Specialty Care (CSC) for First Episode Psychosis
 - Supported Employment
- Addition of a new section called “Words to Know” that provides definitions for common terms used.
- Revised “Notice of Availability of Language Assistance Services and Auxiliary Aids and Services”, formally, “Notice of Availability Language Tagline”
- *Notice of Privacy Practices*, effective February 16, 2026

Notice of Privacy Practices (NPP)

Changes to the Federal 2024 HIPAA Rule resulted in updates to the *Notice of Privacy Practices* effective February 16, 2026. The Alameda County Office of Compliance Services has published an updated version of the *NPP* and *NPP Summary* to reflect recent regulatory changes and AC Health’s privacy policies.

The full *NPP* is embedded in the Updated *Integrated Member Handbook*. The ACBHD Privacy Practices policies, as well as the [full NPP](#) and [NPP summary](#) are also available in all threshold languages on the [Office of Compliance Services](#) website and the [QA Informing Materials](#) webpage.

Actions Required:

- Discontinue the use of the *ACBHD Informing Materials Packet*.
- Review the updated *Integrated Member Handbook* with existing members, in the threshold language and format of their choosing.
- Provide existing members with a paper copy of the *NPP* and/or *NPP Summary* and *Integrated Member Handbook*, if requested.
- Ask all existing members to sign the [NPP Summary](#) as confirmation of receipt of the NPP. Save a copy of the signed form in the member’s record. If a member declines to sign the form, note in the member’s record that the NPP was offered and reviewed, and the member declined to sign the form.
- Post the full *NPP* in a visible area (waiting room, lobby) at all program locations.
- All staff who interact with members must review the updated *NPP* and *NPP Summary* and the NPP slide deck titled *AC Health: Understanding the Notice of Privacy Practices*

(NPP). Records of the training should be stored and provided to AC Office of Compliance Services, upon request.

- Utilize the updated documents for all new members.

Support

This information will be reviewed in the next monthly Mental Health and Substance Use Disorder Brown Bag meetings. Links to both meetings are available on the [QA Training](#) page. All providers are encouraged to attend.

For questions regarding this memo and general technical assistance, please email qaoffice@acgov.org.

Attachment

AC Health: Understanding the Notice of Privacy Practices (NPP).

Notice of Privacy Practices (NPP) – Staff Education

**Office of Compliance Services
January 2026**

Duration: 7 Minutes (No Audio)



Alameda County Health

Learning Objectives

By the end of this session, staff will be able to:



Explain the NPP: What it is and why it matters.



Understand Updates: What's new under the Final Rule and what it means for staff.



Provide the NPP: When and how to share it with beneficiaries.



Handle PHI Responsibly: Including 42 CFR Part 2-protected Substance Use Disorder information.



Recognize Beneficiary Rights: Federal and state privacy protections.








Apply Knowledge: Make correct decisions through real-world scenarios.



Know Resources: Who to contact with questions or concerns.

What is the Notice of Privacy Practices or “NPP”?

-  **Explains PHI Use/Disclosure:** How beneficiary health information is used or disclosed.
-  **Privacy & Confidentiality Rights:** Outlines beneficiaries’ rights.
-  **Required by Law:** NPP helps ensure compliance with federal and state privacy regulations, including HIPAA and 42 CFR Part 2.
-  **Staff must:** explain the NPP; provide a full copy or online link; and provide the NPP Summary and obtain beneficiary acknowledgment.
-  **Follow the NPP:** Apply it in all PHI disclosures.

Situation	Solution
Beneficiary refuses to sign NPP acknowledgment.	Provide care anyway; document refusal.

What's New in Our NPP (*Effective February 16, 2026*)?



Final Rule Alignment: Reflects latest federal guidance.

- **Implementation Deadline:** Revised NPP and Summary must be in use by **February 16, 2026**.



SUD Information (42 CFR Part 2):

- Now aligned with HIPAA Privacy Rules.
- With a general Part 2-compliant consent, SUD information can be used/disclosed **only for Treatment, Payment, and Healthcare Operations (TPO)**.



California Privacy Protections: State requirements now included.









Minor Confidentiality: Added safeguards for minors' health information.










Key Message: These updates help us protect beneficiary privacy and follow the newest rules – stronger protections, not extra work.

When and How to Provide NPP

-  **New Beneficiaries:** Provide at first encounter.
-  **Existing Beneficiaries:** Provide when NPP is updated.
-  **Upon Request:** Provide whenever requested during care.
-  **Paper or Electronic Copies:** Offer based on preference.
-  **Language Access:** Available in County threshold languages.
-  **Document:** Record acknowledgment or refusal.

Situation	Solution
Beneficiary requests an electronic copy of full NPP; office only has paper.	<ol style="list-style-type: none">1. Offer a paper copy.2. If the beneficiary prefers, offer to email a copy to the address on file.3. If they do not want paper or email, direct them to the posted/online version.4. Document acknowledgment or refusal.

Staff Responsibilities

-  **Review Updated NPP:** Stay familiar with the latest version.
-  **Offer & Explain:** Present the NPP to beneficiaries.
-  **Provide Summary & Obtain Acknowledgment:** Retain in medical record.
-  **Follow the NPP:** When using or disclosing PHI.
-  **Verify SUD Consent:** For 42 CFR Part 2 records before disclosure.
-  **Share Minimum Necessary:** Limit information to what's needed.
-  **Document:** Acknowledgment or refusal.

Situation		Solution
Adult Beneficiary: Family member calls asking for appointment or treatment information.		Adult: If consent is on file, you may share the authorized information and document the interaction. If there is NO CONSENT on file, do not share any information. Politely decline and document the call.
Minor Beneficiary: Parent/legal guardian calls requesting information.		Minor: Verify legal guardianship, confirm what can be shared, provide only authorized information, and document.

Beneficiary Rights

Beneficiaries have the right to:



Get a Paper Copy: Of the NPP.



Access Records: View medical information.



Request Changes: Amend or restrict PHI.



See Disclosures: Receive an accounting of PHI sharing.



File Complaints: Report suspected privacy violations.

Situation



Solution

Example 1: A beneficiary asks for a copy of their medical records electronically.

Provide access in the form & format requested if readily producible. If not, offer an alternative format. Document the request and fulfillment.

Example 2: A beneficiary states that part of their medical record is incorrect and wants it changed.

Provide the amendment request form, forward it to the appropriate department/provider, and document the request.

Accessing Our Privacy Policies



Purpose: Policies explain how we follow the law, protect beneficiary information, and guide decision-making.



Staff Responsibility: Review, understand, and follow the NPP and Privacy Policies.



Where to Find Policies: [AC Health OCS Privacy Program](#) – download and save them to your files for your reference.



Updates: OCS will notify staff whenever policies are updated.



Review Regularly: Annually or whenever updates occur.

Situation









Solution

You are unsure whether a disclosure is allowed.

Review the policy, speak with your supervisor, or contact OCS at ACHealth.Compliance@acgov.org before sharing PHI.

Key Takeaways

-  **Use the Updated NPP & Summary:** Starting **February 16, 2026**, always use the new versions.
-  **Know the NPP:** Explain it, provide it, and follow it.
-  **Protect PHI:** Follow privacy rules, minimum necessary, and SUD consent requirements.
-  **Respect Beneficiary Rights:** Access, amendment, restrictions, accounting, and complaints.
-  **Document Everything:** Acknowledgments, refusals, and consents.
-  **When in doubt, it's okay to ask!**

Remember:  **Pause,**  **Check, and**  **PROTECT!**

Whenever you're handling PHI, remember to:

 **PAUSE** and think,

 **CHECK** the rules and consents, and

 **PROTECT** the beneficiary's information. It's a quick way to stay compliant and keep our beneficiaries and our organization safe.

Contact for Questions or Concerns



Office of Compliance Services

Phone: 510-618-3333

Email: ACHealth.Compliance@acgov.org

Visit: [Office of Compliance Services - Home](#)

<https://acgovt.sharepoint.com/sites/HCSA-OCS>