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.

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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.	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.

Adult Beneficiary: Family member calls asking for appointment or treatment information.	<u>**Adult:**</u> 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.	<u>**Minor:**</u> 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.

https://acgovt.sharepoint.com/sites/HCSA-OCS/SitePages/Privacy-Program.aspx

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.

Alameda County Health

Contact for Questions or Concerns

Alameda County Health

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