

University Physicians Inc.



NOTICE OF PRIVACY PRACTICES POLICY

Latest Revision:

Original Effective Date: April 4, 2003

Purpose

To provide guidance on when the Organized Health Care Arrangement (OHCA) Notice of Privacy Practices document must be given to patients and human subjects.

Policy

The OHCA, for which UPI is a member, must provide its Notice of Privacy Practices to all individuals who are patients of the OHCA. Inmates may be given the Notice of Privacy Practices document but the OHCA has no requirement under HIPAA to provide inmates with this document.

Procedure

Health Care Providers

- (1) An OHCA health care provider that has a direct treatment relationship with an individual must provide the appropriate notice no later than the date of the first service delivery, including service delivered electronically, to the individual after April 14, 2003.
 - (a) If the first service delivery occurs during an emergency treatment situation then the notice should be delivered as soon as practicable after the situation.
 - (b) If the first service delivery occurs electronically, the provider must provide electronic notice automatically and contemporaneously in response to the individual's first request for service.
- (2) Except in emergency treatment situations, the health care provider with a direct treatment relationship must make a good faith effort to obtain a written acknowledgement of receipt of notice from the individual. If the individual will not acknowledge receipt of the notice or will not accept the notice, the health care provider must document his or her good faith efforts to obtain acknowledgement and the reason why the patient would not acknowledge receipt of the notice or would not accept the notice.
- (3) If the health care provider maintains a physical service delivery site, the provider must:
 - (a) Have the notice available at the site for individuals to request to take with them; and,
 - (b) Post the notice in a clear and prominent location.

Electronic Notice

UPI will provide a link on the organizations web site directing individuals to the Notice of Privacy Practices of the OHCA.

Definitions See glossary for key terms and acronyms used in this policy.
(On file with Privacy Officer)

Enforcement Enforcement of this policy will reside with the Privacy Officer or appropriate Management.

**Rationale/
Source** This policy complies with requirements of the following:
Health Insurance Portability and Accountability Act (HIPAA), Privacy Rule

**Cross
References** For additional information, refer to the following:

Document Name

**Review or
Revision Date** This policy is reviewed and approved annually, and as revised.

MM/DD/YYYY	MM/DD/YYYY	MM/DD/YYYY	MM/DD/YYYY

Governance Responsibility for adoption and/or implementation of this policy is as follows:

Approving Body		Executive Approval	
Privacy Officer:	04/04/03	Chief Operating Officer:	04/04/03
Signature on file.	Date	Signature on file.	Date