



*Corporate Compliance*

<b>POLICY TITLE:</b> Notice of Privacy Practices	<b>SYSTEM POLICY AND PROCEDURE MANUAL</b>
<b>POLICY #: 800.45</b>	<b>CATEGORY SECTION: Corporate Compliance</b>
<b>System Approval Date:</b> 6/18/18❖	<b>Effective Date:</b> 4/2003
<b>Site Implementation Date:</b> 6/18/18❖	<b>Last Reviewed/Approved:</b> 4/21/16
<b>Prepared by:</b> Office of Corporate Compliance	<b>Notation(s):</b> N/A

**GENERAL STATEMENT of PURPOSE**

The purpose of this document is to outline the established requirements for the distribution and provision of the Northwell Health Notice of Privacy Practices (“NPP”).

**POLICY**

It is the policy of Northwell Health to provide a copy of the Northwell Health NPP (Form: SYSHIPAA) to all patients, or patients’ designated representatives, with the exception of inmates, no later than the date of the first service delivery, including services delivered electronically. Northwell Health will make a good faith effort to obtain the patient’s, or Personal Representative’s signature acknowledging receipt of the NPP.

**SCOPE**

This policy applies to all Northwell Health employees, as well as medical staff, volunteers, students, trainees, physician office staff, contractors, trustees and other persons performing work for or at Northwell Health; faculty and students of the Donald and Barbara Zucker School of Medicine at Hofstra/Northwell conducting research on behalf of the Zucker School of Medicine on or at any Northwell Health facility; and the faculty and students of the Hofstra Northwell School of Graduate Nursing and Physician Assistant Studies.

## **DEFINITIONS**

**Personal Representative:** the individual who, for decision-making purposes, will be treated as the patient. Depending upon the facts and circumstances of each case, a Personal Representative may be directly appointed by the patient or may be deemed to serve the role of Personal Representative under applicable laws and regulations.

## **PROCEDURE**

### **Content and Distribution of the Notice of Privacy Practices**

1. Northwell Health will maintain a NPP that is written in plain language and that includes, at a minimum, the standard language attached hereto in Appendix A.
2. The NPP will be provided to all patients, or patients' representatives, with the exception of inmates, at the time of registration.
3. In an emergency situation, Northwell Health will provide the NPP to the patient, or the patient's personal representative, as soon as reasonably practicable after the emergency treatment situation.
4. Patients will not be given another copy of the NPP if they are designated in Northwell Health records as previously registering and receiving the Northwell Health NPP.
5. The NPP will be posted in Northwell Health registration areas and on the Northwell Health website.
6. In the event that the NPP is materially revised, the new NPP will be given to new patients, made available to existing patients upon request and posted in Northwell Health registration areas and on the Northwell Health website. A material change to any term of the NPP may not be implemented prior to the effective date listed in the newly revised NPP.
7. Additional copies of the NPP will be made available, upon request of the patient, or Personal Representative.
8. Northwell Health may provide the NPP to a Northwell Health patient by e-mail. A paper copy must be provided at the request of the patient or if the e-mail transmission fails.
9. Northwell Health will take reasonable steps, based upon identified language needs, to translate and provide the NPP to patients with limited English proficiency.

### **Obtaining Acknowledgement of Receipt**

1. Patients will be asked to sign the NPP "Acknowledgement of Receipt" form attached to each Northwell Health NPP.
2. The "Acknowledgement of Receipt" form will be filed in the patient's medical

record.

3. If a patient, or Personal Representative, refuses to sign the “Acknowledgment of Receipt” form, Northwell Health will document the good faith attempt to provide the NPP to the patient in the space provided on the “Acknowledgement of Receipt” form. *See Appendix A.*
4. The “Acknowledgement of Receipt” form will be filed in the same manner as if the NPP had been signed.

### **Training**

The Office of Corporate Compliance will provide training on HIPAA on, at least, an annual basis.

### **Sanctions**

In compliance with the HIPAA Privacy Rule, violations of this policy will be subject to disciplinary action as outlined in the Human Resources Policy and Procedure Manual and in the Bylaws, Rules and Regulations of the Medical Staff.

### **Document Retention**

Any documentation generated in compliance with this policy will be retained for a minimum of 6 years from the date of its creation.

### **ENFORCEMENT**

All violations of this policy shall be reported to the appropriate manager/supervisor/director or to the Office of Corporate Compliance (516.465.8097) for appropriate resolution of the matter. You can also make an anonymous report to the Compliance Help-Line, 24 hours a day, 7 days a week, by calling (800) 894-3226 or by visiting [www.northwell.ethicspoint.com](http://www.northwell.ethicspoint.com) online.

**Questions related to the access, use, disclosure of PHI will be directed to the Privacy Officer, Office of Corporate Compliance 516.465.8097.**

### **CLINICAL REFERENCES/PROFESSIONAL SOCIETY GUIDELINES**

N/A

### **REFERENCES to REGULATIONS and/or OTHER RELATED POLICIES**

Health Insurance Portability and Accountability Act, 45 CFR Parts 160 and 164  
Health Information Technology for Economic and Clinical Health (HITECH) Act, Title XIII of Division A and Title IV of Division B of the American Recovery and Reinvestment Act of 2009 (ARRA), Pub. L. No. 111-5 (Feb. 17, 2009)

Final HIPAA Omnibus Rule (78 Fed. Reg. 5566)  
Human Resources Policy and Procedure Manual, Part 5 - Bylaws, Rules and Regulations of the  
Medical Staff

**ATTACHMENTS**

N/A

**FORMS**

Vital Document SYSHIPAA—Notice of Privacy Practices

<b><u>APPROVAL:</u></b>	
Northwell Policy Committee	6/18/18❖
System PICG/Clinical Operations Committee	6/18/18❖

Standardized Versioning History:

\*=Northwell Policy Committee Approval; \*\* =PICG/Clinical Operations Committee Approval

8/10/10\* 9/23/10\*\*

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- ❖ Expedited Approval Granted by:  
Winifred Mack, SVP/Operations – Chair, Northwell Policy Committee  
Morris Rabinowicz, MD, Co-Chair, - System PICG/Clinical Operations Committee