

Notice of Privacy Practice Distribution

POLICY:

The Health Insurance Portability and Accountability Act of 1996 (HIPAA) requires that covered entities distribute a Notice of Privacy Practices (NPP) to individuals receiving treatment and to members of its health plan. This Notice describes how medical information about a patient or employee may be used and disclosed by the covered entity, how the patient or employee can get access to this information, and also the rights that individuals have to control certain uses or disclosures of their information. It is the policy of Purdue University that its covered healthcare providers and health plan will distribute the Notice of Privacy Practices in compliance with the requirements of HIPAA.

PROCEDURE:

Healthcare Providers

Purdue's covered healthcare providers will distribute to its patients the Notice of Privacy Practices at the first instance of service delivery, including service delivered electronically, and to others, upon request. In an emergency treatment situation, the Notice will be provided as soon as reasonably practicable after the emergency treatment situation. A good faith effort will be made to obtain a written acknowledgement of receipt of the Notice by the individual and this acknowledgement will be maintained in the patient medical record. If an acknowledgment cannot be obtained, a statement describing the effort to obtain the acknowledgement and the reason why the acknowledgment was not obtained, must be added to the record.

Following a revision of the Notice, the health care provider will make the Notice available upon request on or after the effective date of the revision and will have the Notice available where services are provided.

The Notice will be posted in a clear and prominent location where it is reasonable to expect individuals seeking service from the covered health care provider to be able to read the Notice (e.g. check-in desk).

If the initial delivery of service is not face-to-face, staff should offer to provide the Notice at the next visit by the patient to the healthcare facility or by mail if preferred. If the patient prefers to receive the Notice by mail, the Notice will be sent to the patient's address with a letter requesting a returned acknowledgement of receipt. A copy of the letter will be maintained in the patient's medical record. If the patient returns the acknowledgement of receipt, the acknowledgement will also be stored in the patient record.

Health Plan(s)

Purdue's health plan(s) will provide the Notice of Privacy Practices for Purdue University's Health Plans at the time of enrollment, to individuals who are new enrollees (the named insured of a policy under which coverage is provided to the named insured and one or more dependents). At least once every 3 years, Purdue's health plan will notify health plan members of the availability of the Notice and where to obtain a copy.

If there is a material change to the Notice, if the health plan posts its Notice on its web site, it must prominently post the change or its revised Notice on its web site by the effective date of the material change to the Notice and provide the revised Notice, or information about the material change and how to obtain the revised Notice, in its next annual mailing to individuals then covered by the plan.

If the health plan does not post its Notice on a web site, it must provide the revised notice, or information about the material change and how to obtain the revised Notice, to individuals then covered by the plan within 60 days of the material revision to the Notice.

Requirements for Electronic Provision of the Notice – Acknowledgement by the Provider

A covered health care provider or health plan that maintains a web site that provides information about the covered entity's customer services or benefits must prominently post its Notice on the web site and make the Notice available electronically through the web site.

A covered entity may provide the Notice required by this section to an individual by e-mail if the individual agrees to electronic notice and the agreement has not been withdrawn. If the covered entity knows that the e-mail transmission has failed, a paper copy of the notice must be provided to the individual.

If the first service delivery to an individual by a healthcare provider is delivered electronically, the provider must provide electronic notice automatically and at the time of the service in response to the individual's first request for service. The individual who is the recipient of electronic notice retains the right to obtain a paper copy of the notice from a covered entity upon request.