Privacy Procedure





L-06: Provision of Notice of Privacy Practices

POLICY: See L-06 Provision of Privacy Practices Policy at www.cosdcompliance.org.

DEFINITIONS: See HHSA Policy L-30.

PROCEDURES:

- A. Provision of NPP. The Program shall:
 - 1. Except in an emergency, provide the NPP to the individual with authority (see HHSA Policy L-27) no later than the date of the first service. In an emergency, Program will provide NPP at the first opportunity.
 - 2. Provide a copy of the NPP to individuals upon request
 - 3. Post the NPP in a prominent location accessible to the public
 - 4. Provide individuals the website link for an electronic copy of the NPP: www.cosdcompliance.org
 - 5. Upon material revision, provide revised NPPs to individuals and post the revised NPP as above
 - 6. At its discretion, provide the NPP to an individual by email, if the individual agrees; however, that individual retains the right to also obtain a paper copy of the NPP.
 - 7. Provide copies of the NPP in all threshold languages and will provide interpreter services to ensure all individuals understand their Privacy Rights and the County's Privacy requirements.
 - 8. Not combine the NPP with any other document
- B. Provision of the NPP Acknowledgement form:
 - 1. The Program will have the individual complete the Acknowledgment form when the NPP is provided.
 - 2. If the individual declines to sign the Acknowledgment form, Program staff shall document as follows:
 - a. On the Acknowledgement form itself: Staff shall draw a line through the Acknowledgement form, write "Client declined to sign" and the date the client declined to sign.
 - b. In the case record, staff shall document the efforts taken to obtain client's acknowledgement, the date, and any known reason the Acknowledgment form was not signed.
 - 3. Acknowledgment forms will be filed with the individual's medical record and will be retained in accordance with County policies for record retention.

QUESTIONS/INFORMATION: HHSA Privacy Officer at 619-338-2808