

## **Alamo City Medical Group P.A.**

### **Notice of Privacy Practices**

**Effective April 14, 2003 health care organizations and their affiliated operations will be required by Federal Law, to notify all patients of their rights according to the Health Insurance Portability and Accountability Act of 1996 (HIPAA). Alamo City Medical Group has prepared this document to aid you in the implementation plan of the requirements.**

**The Administrative Simplification section of HIPAA has multiple parts (transaction standards, code sets, security, privacy, health care plan identifiers and more.) The Department of Health and Human Services is the governmental agency that has given the responsibility of issuing a set of interlocking regulations to implement each section. Physicians and other entities covered by HIPAA have approximately two years to come into complete compliance with each final rule.**

**To date, the first two HIPAA regulations are final and have established compliance dates, the "Transactions Standards" and "Privacy Rule".**

- **Transaction Standards compliance deadline: October 16, 2003**
- **Privacy Rule compliance deadline: April 14, 2003**

**Health care providers must comply with HIPAA standards if the physician, billing company, or third party transmits any health information in electronic form in connection with any of the following transactions:**

- **Health care claims**
- **Health care payment or remittance**
- **Coordination of benefits**
- **Health care claim status**
- **Enrollment and dis-enrollment in health plans**
- **Eligibility for health plan**
- **Health plan premium payments**
- **Referral certification and authorization**
- **First report of injury**
- **Health claims attachments**
- **Other transactions that the government may prescribe by regulation**

**ACMG is currently evaluating operational issues that will fall under the HIPAA compliance regulations. Several procedures will be implemented to bring the organization into compliance. A compliance system has been developed to begin the process. First we must begin with the education of the employees and the responsibilities involved.**

**Two documents must be retained for six years (from creation of the consent or the date when it last was in effect.) In cases where the consent is not obtained in accordance with regulation, such as in an emergency situation where treatment is provided, the physician/practice must document the attempt to obtain consent and the reason why consent was not obtained.**

- **The first document is referred to as the Notice of Privacy Practices or NPP. This document must be read and the patient must acknowledge that they have reviewed it.**
- **The second document is referred to as a Consent for Treatment form, which must be completed by each patient before they are treated. In signing the consent document, the patient is permitting the physician and the practice to use or disclose the patient's protected health information to treat the patient, to ensure that the patient's bills are paid, and to operate the business of the practice. This signature is *only required once*, not at each visit.**

**The privacy rule requires that the practice document policies and procedures for obtaining consent in electronic and written format. Each Clinic has a reference manual or Butterfly which will have a section dedicated to the HIPPA rules and examples of each document. The forms for clinic use will be printed and may be reordered through the Accounting Dept. We will be distributing the forms and required supplies with their use, to begin on Monday April 7<sup>th</sup>, 2003.**

## **HIPAA Compliance Clinic Procedures**

- **A copy of the NPP must be posted in each waiting room**
- **A laminated copy will be presented to each patient as they sign in upon arrival for their appointment.**
- **The patient will be asked to read the NPP in compliance with HIPAA regulations.**
- **A rubber stamp will be issued to the front office staff to place on the back of the Patient Information Sheet for the patient's signature.**
- **The patient will read the NPP and acknowledge their understanding of it by signing a stamped statement (placed on the back side of the pt. information sheet)**
- **Each Clinic will decide what process works best for their individual clinic. The signature may be obtained by the front office at the intake process or the back office staff when completing their vitals. Irrespective of who has responsibility at the clinic for obtaining the patient signature, it is everyone's responsibility to assure the patient has reviewed the NPP and signed their acknowledgement.**
- **A copy may be provided to any patient upon request**
- **If the patient refuses to sign, simply document their refusal next to the stamped statement on the Patient Information Sheet, date it and initial it. (Only the Consent for Treatment form is mandatory.)**
- **Each patient must sign a copy of the Consent for Treatment form. This form , will take the place of the current Assignment of Benefits (form number 1103). Please omit this form from the patient intake process. *The Consent for treatment must be signed by the patient for treatment to be administered.***

**Hopefully, patients will not have too many questions and the intake process will have only a minimal delay. If assistance is required for the HIPAA compliance procedures, please do not hesitate to contact Administration.**

## **How To Inform Patients of HIPAA Regulations**

**When patients sign in, inform them that you have a new procedure to tell them about. For example:**

- o **“ Good morning, please sign in. I need to inform you that our check-in procedure has two (2) additional documents that will need your attention. Our office is now required by federal law to inform you of our office policies on maintaining the privacy of your medical information. The second form, is a Consent for Treatment. This form allows our office to treat you and conduct business. ”**

**Collect the usual insurance and billing information and as their chart is put back for the MA, hand them the laminated copy of the NPP to read as they wait.**

**If the patient is new to the practice, collect the usual information including the new Consent for Treatment. After the New Patient paperwork is completed and turned back in to you, tell them about the NPP, required by law and allow them to read the laminated copy while they wait. This will avoid delays.**

**The Receptionist may witness the patient signature or it may be obtained by the MA after vitals are taken.**