

Topic: Posting and availability of Notice of Privacy Practices	Department: Entire Agency
Original effective date: 1/21/21	Last revision date: 11/15/24
Owner: VP for Quality and Compliance	Frequency of reviews: Annual
Internal/Regulatory Reference(s) (all that apply): 164.520(c)(2)(iii)(A) & (B)	
Related documents/Links:	

Policy: It is the policy of The Arc of Monroe (“The Arc”) to ensure that people have opportunities for privacy and that business, administrative and support functions promote personal and organizational outcomes.

Additional Information: Per HIPAA law, providers’ Notices of Privacy Practices (“Notice”) must be posted in a clear and prominent location where it is reasonable to expect individuals seeking service are able to read the notice. In addition, a copy of the Notice must be available for people supported to take with them. The Notice will also be available on the agency’s website. Notices are available in both English and Spanish.

For the purposes of this procedure, “posted” means that it is hung in its entirety so that the entire Notice can be seen without needing to turn or flip pages. This means hanging each page individually.

Procedure	
Task:	Responsible party:
General Guidelines	
1. All agency facilities, including our residential sites, will ensure that The Arc’s Notice is posted where people supported are likely to see it.	Managers
2. For non-residential sites, these should be posted prominently by the facility’s receptionist.	Managers
3. In residential sites, these should be posted in the staff office. Residence managers should inform residents that the Notice can be found there and that they can review it at any time. Notices should NOT be posted in common areas of the home so as not to detract from establishing a home-like feel.	Managers
4. In addition to the above, all facilities should have copies of the Notice available for people to take with them. Notices are available in English and Spanish.	Managers
5. If there is a request for the Notice in a language other than English or Spanish, please reach out to the VP for Quality and Compliance for assistance in obtaining the notice in the language requested.	Managers, VP for Quality and Compliance
Manager responsibilities:	
1. Managers should have a solid understanding of the requirements of this policy.	Managers
2. Managers have primary responsibility for ensuring that the Notice is posted at their site(s), consistent with this policy.	Managers
3. Managers are responsible for ensuring that a copy of the Notice is obtained in any language preferred by people they support, by contacting the VP for Quality and Compliance.	Managers

VP for Quality and Compliance:	
1. Acts as the agency's Privacy Officer	VP for Quality and Compliance
2. Responsible for administering the agency's HIPAA privacy policies and procedures	VP for Quality and Compliance
3. Acts as a resource for staff in regards to proper implementation of the HIPAA privacy rule	VP for Quality and Compliance

Document revision record:

Revision Date	Release Date	Reason for change	Approver
4/12/23	4/12/23	Added a statement that the Notice will be available on the agency's website	ICC
11/15/24	11/15/24	Specifically stated that managers are responsible for obtaining the Notice in other languages	ICC