

NPP Update Letter to Clients

Subject:

Updated HIPAA Notice of Privacy Practices – Action Required

Dear Client,

We are notifying you of an **important regulatory-driven update** to the **Notice of Privacy Practices (NPP)** used by your dental practice.

What changed in the law

Recent enforcement guidance and regulatory updates under **HIPAA**, including:

- Ongoing enforcement of the **HIPAA Omnibus Rule**
- Expanded patient rights related to **access, disclosures, and breach notification**
- Clarified requirements for **business associate disclosures**
- Federal updates affecting **Substance Use Disorder (SUD) records under 42 CFR Part 2**
- Increased enforcement activity by the **HHS Office for Civil Rights (OCR)**

have required updates to how privacy practices are described to patients. While many of these requirements have existed in regulation, **OCR enforcement now expects these elements to be explicitly stated in the Notice of Privacy Practices** provided to patients.

Why your NPP was updated

The updated NPP now:

- More clearly explains **how PHI may be used and disclosed**
- Expands language regarding **breach notification timelines**
- Adds required disclosures related to **business associates**
- Includes required protections and authorization requirements for **SUD-related records (42 CFR Part 2)**
- Aligns patient rights language with current **OCR audit expectations**

These changes are necessary to ensure your Notice accurately reflects current federal privacy requirements and enforcement expectations.

What you are required to do (ACTION STEPS)

To remain compliant, please complete the following:

1. **Replace your existing Notice of Privacy Practices with the Updated NPP attached to this email.**
2. Begin using the updated NPP immediately
3. Post it in your office **and** make it available upon request
4. **Post the NPP to the practice's website** (link to pdf document is fine)
5. **Provide the updated NPP to patients at their next appointment**

6. Update new patient paperwork

Obtain a new Acknowledgment of Receipt

1. Have patients sign a new acknowledgment of the updated NPP
2. Retain the acknowledgment in the patient record

HIPAA does **not** require retroactive acknowledgment for past visits; acknowledgment should be obtained at the patient's **next encounter** following the update.

What to expect during an audit

During an OCR or state investigation, regulators typically request:

1. The **current version** of your NPP
2. Proof that the Notice was provided to patients
3. **Signed acknowledgments** following material updates to the NPP

These steps **must be completed by February 16, 2026.**

If you have questions about this update or need assistance with staff training or documentation, please contact us.

One last thing, will you hit reply and let me know you received this?

Best regards,