



## OFFICE FOR CIVIL RIGHTS

# MODEL NOTICES OF PRIVACY PRACTICES QUESTIONS AND INSTRUCTIONS

The Department of Health and Human Services, Office for Civil Rights (OCR) and the Office of the National Coordinator for Health Information Technology (ONC) developed these model NPPs to help improve patient experience and understanding. We wanted to create models that used plain language and approachable designs.

### How were these Notices of Privacy Practices (NPPs) created?

To develop the NPPs you see on this site, we first conducted focus groups with consumers to explore the information that they are most interested in seeing in the notices. Then we developed drafts that were tested with actual consumers at four geographically diverse sites. In this testing, we watched how consumers reacted to the NPPs and how easily they could use them. After each round of testing, we made changes to improve both design and language. The overarching goals of this testing was to ensure that consumers:

- Understand the alternative privacy notices (Comprehension)
- Find information needed in the notices (Navigation)
- Use the notices appropriately (Decision Support/Task Completion)

### Which NPP Should You Use?

#### Types of NPPs

We have created NPPs for both **Health Care Provider** covered entities and **Health Plan** covered entities. These versions have some differences in language to reflect the Privacy Rule.

#### Adobe PDF Designs

We have also created three different fillable Adobe PDF designs. As noted above, each of the designs was tested and found to be usable for consumers. Every design has the same language (although the “Layered Version”

also includes an additional first page that summarizes key privacy rights, choices, uses and disclosures).

- **Booklet Version** – This version is set up as booklet that is folded and stapled. Consumers liked this version because it was approachable, easy to read, and portable.
- **Full Page Version** – This version uses similar design elements as the booklet but is configured to be printed on a full page (8 ½ X 11 size). If you like the design of the brochure but don’t want to print and assemble it, this version is a useful option.
- **Layered Version** – This version has a one-page summary of key privacy rights, uses, and disclosures on the first page. It is configured to be printed on 8 ½” X 11” paper. Consumers liked this version because they liked the quick and easy-to-read summary.

#### Microsoft Word Version

This version includes only the unformatted text. You can use this version if you would like the words only to put into your own design.

### How do you customize the designs?

Each of the designs have some areas that allow you to customize the NPP for your covered entity while also helping you comply with the requirements of the Privacy Rule. The gray, fillable fields in each PDF include instructions

for special notes to add to the Notice if they apply to your entity. If you do not have any special notes, you can simply click the space bar to delete them from the page.

### Editing Text Field Properties

To change the point size for the fillable fields, you must use Acrobat Professional version 8, 9, X or XI. Follow these instructions for changing the Text Field Properties:

1. Under the Forms menu, select **Add or Edit fields...**
2. Double-click on the field you'd like to edit to view the **Text Field Properties** dialog box.
3. Select the **Appearance** tab. In the Text section, change the Font Size using the pop-up menu or type in the point size you'd like to use.
4. Click **Close** in the bottom right corner of the Appearance window.
5. Under the Forms menu, select **Close Form Editing**. Then add your text as needed. It will appear in the new font size you've selected.

### How do you add a logo?

If your entity would like to add a logo instead of your entity's name in the upper left corner of page 1 (or page 8 of the brochure design), there are two ways to add logo art: Using Microsoft Word or Using Adobe InDesign.

#### Using Microsoft Word

1. Create a Word document that is the same page size as the PDF document.
2. Insert the logo file in the same position as the fillable area for your entity's name. Then print the page.
3. Place the page in the printer again and print page 1 of the PDF on to the page with your logo.
4. Collate with the other pages of the PDF.

#### Using Adobe InDesign

5. Create an InDesign document the same page size as the PDF document.
6. Import a PDF of page 1 (page 8 for design option 3).

7. Place the logo file in the same position as the fillable area for your entity's name.
8. Print the page and collate with the other pages of the PDF.

### What are some "Best Practices for using these designs?"

- **If possible, use the language and designs tested "as is."** The text was tested in the designed format, and it is difficult to separate language and design since they work in concert. Consumers felt the tested language sounded like the organization cared about their personal information. We don't have testing evidence that the language will work as well in a different format but have provided the language in a separate document in case it is necessary for an entity to fit the language into its own format.
- **Consumers preferred these designs in color.** Consumers found the color versions much more appealing and said they would be more likely to read something in color. Most people did not find the designs as appealing when shown to them in black and white. It may not be practical or cost effective to print many copies in color. Therefore, we suggest having a few copies printed in color but any copies requested could be provided in black and white. In addition, some entities may choose to print a full color (laminated) version of the NPP for patients to view when they walk in and then provide black and white copies for patients to review.
- **Consumers highly preferred the booklet format.** Participants liked the simple cover and felt the booklet looked less intimidating and was a manageable size. They said it was the easiest to use and that they would be more likely to pick it up and possibly even take it home to review later. It may not be practical or cost effective to provide NPPs in the booklet format. Alternatively, we have



provided the brochure design in a Full page format although this version has not been tested.

- **Consumers liked the concept of the layered notice.** Consumers understood the usefulness of the summary page (page 1) because it provided a basic overview, was easy to skim, and it told them where to go to get more information. They felt they would use it and sometimes did use it if they read something on the summary page that they wanted to know more about.
- **Consumers suggested having copies of the NPP available in the examination room as well as in the waiting room.** Consumers felt the waiting room offered many distractions and that they might be more likely to pay attention to or read the NPP while they were waiting for their doctor. They felt the examination room generally provided fewer distractions.

