

CLIENT ALERT

New HIPAA Privacy Rule Guidance

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The Department of Health and Human Services' Office of Civil Rights (OCR) has released a 100+ page guidance document on the HIPAA Privacy Rule. The guidance document discusses a broad array of topics in a Q&A format. OCR is the agency responsible for enforcing the Privacy Rule, so this guidance provides useful insight about the government's approach to some of the Privacy Rule's "hot topics". For example, OCR states that physicians with hospital staff privileges need not enter into business associate contracts with the hospital, because joint physician-hospital activities fall under the definition of "organized health care arrangement".

For more information, please contact the professional(s) listed below, or your regular Crowell & Moring contact.