



Dental Practice Checklist: HIPAA Notice of Privacy Practices (NPP)

COMPLETE BY FEB. 16, 2026

Dental offices that are covered by HIPAA must update, by February 16, 2026, their HIPAA Notice of Privacy Practices (NPP) to address the use and disclosure of Protected Health Information (PHI) received from a Part 2 substance use disorder treatment program.

- Update the Notice of Privacy Practices (NPP) by February 16, 2026 to address the use and disclosure of PHI related to a Part 2 substance use disorder (SUD) treatment program. The ADA has updated its [Sample HIPAA Notice of Privacy Practices](#) to include a section about Part 2. *(This is a complimentary member resource. ADA login is required to access.)*
- Whenever you revise your NPP, HIPAA requires that you:
 - Make the notice available upon request on or after the effective date of the revision
 - Post the revised NPP in a clear and prominent location where it is reasonable to expect individuals to be able to read the NPP.
 - Have the NPP available at the dental practice for individuals to request to take with them.
- Using the revised NPP, continue to follow the usual HIPAA rules concerning providing the NPP:
 - If you have a dental practice website, post the updated NPP on the website
 - Provide the NPP to patients on or before their first appointment (except in an emergency) and request the new patient sign an acknowledgment of receipt (if acknowledgment of receipt is not obtained, document your attempt and why it was not obtained). In an emergency, provide the NPP as soon as reasonably practicable after the emergency (the acknowledgment of receipt need not be requested). Note that when a dental practice revises its HIPAA NPP, HIPAA does not require obtaining a new acknowledgment of receipt from existing patients. The dental practice is only required to make a good faith effort to obtain the acknowledgment of receipt at the time of the first appointment.
 - You can provide the NPP electronically if the patient has agreed to receive it electronically.
- Train staff to be aware of the updated NPP that reflects 2026 updates regarding Part 2 SUD information.
- HIPAA requires compliance documentation to be retained for six years from the date the document was created or six years from the date the document was no longer in effect, whichever is later. This retention requirement applies to all HIPAA compliance documentation, including training documentation and previous versions of your HIPAA NPP.