

REVISED HIPAA NOTICE OF PRIVACY

Summit has updated the HIPAA Notice of Privacy Practices to include additional protections under Part 2 related to records containing substance use disorder (SUD) information. February 16, 2026, was the deadline to revise HIPAA Notices of Privacy Practices to reflect these changes required by a 2024 Final Rule regarding privacy practices for Part 2 records.

Notices should be updated and included in materials going forward and posted to the covered entity's website (if applicable). For example, if the employer sponsors a group health plan and maintains a website for group health plan information, the revised NPP should be posted there.

Is Another NPP Mailing Needed?

Not necessarily.

When there is a material change in the NPP, a health plan that posts its notice on its website must post the revised notice on its website by the effective date of the change (February 16, 2026) and provide the revised notice in the next annual mailing to individuals covered by the plan. Summit will post this notice to our portal as well.

If the notice is not posted on the plan's website, then the revised NPP or information about the material change and how to obtain the revised NPP should be furnished to the primary insured covered by the plan within 60 days of a material revision. The notice may be provided electronically if an individual has agreed to receive the notice in that manner.

