

VAMHCS RESEARCH SERVICE HOT TOPIC

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VA “Notice of Privacy Practice” (NOPP) Must Be Given to Non-Veteran Participants in VA Research Studies

A requirement of HIPAA is that all persons receiving health services must be given a “notice of privacy practice” by their health providers.

When veterans register with the VHA for health services, the VHA automatically sends them the VA “Notice of Privacy Practice” (NOPP). Therefore, when veterans enroll in VA research studies, they have already received the required notice.

However, non-veterans do not automatically receive this notice (NOPP) from the VHA.

Therefore, when **non-veterans** enroll in an **approved VA research study*** they must be given the VA NOPP. The PI is responsible for having the “VHA NOPP Acknowledgement Form” (VHA10-0483) signed and dated by the non-veteran research participant. [VHA Handbook 1605.04]

***VA research study: a study that is approved by the [VAMHCS] R&D Committee and conducted by VA Investigators including PIs, Co-PIs, and Site Investigators on VA time (serving on compensated, WOC, or IPA appointments), utilizing VA resources (e.g., equipment), or on VA property including space leased to, and used by VA. The research may be funded by VA, by other sponsors, or be unfunded.** [VHA Handbook 1200.05 3.xxx]

What you need to do:

- When enrolling participants into your **VA research study***, find out if they are a veteran or a non-veteran. If they are a non-veteran, give them the VA “Notice of Privacy Practice” (see attached). The NOPP may also be printed from the VAMHCS Home Page.
Rule of thumb: If the participant is signing a VAMHCS or a VA CIRB research consent form, and the participant is a non-veteran, then the VA NOPP must also be given to the participant.
- The participant keeps the NOPP and signs VHA Form 10-0483 (“Acknowledgement of the Notice of Privacy Practices”) (see attached).

- File the original signed 10-0483 with your study documents with the participant's signed HIPAA authorization and informed consent form.
- If the participant has a CPRS chart, send **a copy** of the signed 10-0483 to the Research Service for scanning. Include it with the consent and HIPAA documents that you already send for scanning.
- Send **a copy** of all signed 10-0483s to the VAMHCS Privacy Office (even if they have been sent for scanning)
 - through **encrypted email** (VAMHCSPrivacyOffice@va.gov); **OR**
 - FAX it to 410-605-7832, attention VAMHCS Privacy Officer (remember to use a cover sheet).Be sure that the non-veteran's name and last (4) of their Social Security Number have been inserted on the 10-0483.

- If you have questions feel free to contact the VAMHCS Privacy Office:
 - Angela McCargo
 - VAMHCS Privacy Program Specialist
 - (P) 410-605-7000, ext. 3152
 - (F) 410-605-7832
 - Angela.McCargo@va.gov

For questions concerning this or other Research Service Hot Topics OR for adding staff or colleagues to the Hot Topics mailing list, contact:

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