



## OrthoFi: HIPAA Compliance – Summary of Changes

### Effective February 16, 2026

Update Category	Specific Requirement	Rationale
<b>SUD Disclosures</b>	NPP must describe how Substance Use Disorder (SUD) records (Part 2 Records) are used and shared.	To align stricter SUD confidentiality rules with standard HIPAA TPO (Treatment, Payment, Operations) workflows.
<b>Legal Restrictions</b>	Mandatory statement that SUD records/testimony cannot be used in legal proceedings against the patient without consent or a court order.	To protect patients from legal prejudice resulting from seeking medical care for substance use disorders.
<b>Redisclosure Notice</b>	A specific statement that information shared may be subject to redisclosure and may lose its federal privacy protection.	A new transparency requirement intended to inform patients about the potential lack of downstream data protection.
<b>Fundraising Rights</b>	Explicitly grants patients the right to opt-out of fundraising if their SUD records are involved.	To ensure heightened privacy choice for patients regarding non-clinical outreach.
<b>SUD Accounting</b>	Clarifies that patients may request an accounting of disclosures for SUD records made through an electronic health record.	To mirror patient rights already available for other standard medical records under HIPAA.

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