HIPAA Privacy Rule final rule: access deadlines, fees and 2027 compliance dates

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Short answer: the HIPAA Privacy Rule final rule published by the US Department of Health and Human Services on 19 November 2026 changes how patients get their records and how providers and health plans share information for care coordination. It takes effect on 19 January 2027, with compliance required by 19 July 2027. It matters because the usual deadline to answer an access request falls from 30 days to 15.

TL;DR The short version

- HHS published a HIPAA Privacy Rule final rule on 19 November 2026 changing how patients get records and how providers and plans share information for care coordination.
- It takes effect on 19 January 2027 with compliance required by 19 July 2027, and the usual deadline to answer an access request falls from 30 days to 15.
- Practices should update access workflows, fees and notices before July 2027; this is not legal advice.

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What is the HIPAA Privacy Rule final rule?

HIPAA is the US law whose Privacy Rule governs protected health information held by covered entities, such as providers and health plans, and their business associates. This rule, 91 FR 74848, finalises parts of a proposal first issued in 2021. HHS describes its aims as better individual access, easier care coordination and less administrative burden.

Changes to patient access

- Adds definitions of electronic health record and personal health application.
- Requires a response to an access request within 15 calendar days, reduced from 30, with the existing option of an extension of up to 30 days.
- Clarifies the form and format of copies and reduces the burden of verifying identity.
- Limits the right to direct copies to another person to electronic copies of information in an electronic health record, in line with a court decision.
- Amends permitted fees, including no fee for in-person inspection or for access through an internet-based method.
- Requires estimated fee schedules to be posted on the entity's website.
- Requires telling individuals they can still get copies when a summary is offered instead.

Changes to sharing and notices

- Clarifies that individual-level care coordination and case management can fall within health care operations.
- Clarifies disclosures to social services agencies, community organisations and home and community-based services providers for care coordination.
- Removes the requirement to obtain written acknowledgment of the Notice of Privacy Practices from patients in a direct treatment relationship.
- Changes the content of that notice.
- Expressly permits disclosures to telecommunications relay services and extends an armed forces permission to all uniformed services.

What is new compared with the 2021 proposal

- The proposed exception to the minimum necessary standard for individual-level care coordination was not adopted.
- The proposed move from professional judgment to a good faith standard for certain disclosures, including in substance use disorder and serious mental illness, was not finalised. HHS says it will favour technical assistance and education.
- The final rule does not address the proposed fee limit for directing copies to a third party.
- Certain existing business associate agreements may continue for up to one year beyond the effective date.

Limitations and open questions

- This summary covers selected provisions of a long rule. Read the regulatory text before changing policy.
- State law and other federal rules, including those on substance use disorder records and information blocking, can add stricter duties.
- Legal challenges or later guidance could affect application.
- This is not legal advice.

Sources were read on 27 November 2026. Products, rules and data change, so check the linked originals before you rely on any detail.

How to prepare before July 2027

1. Measure current access turnaround, including requests routed to outside vendors.
2. Redesign the workflow to close requests within 15 days and track extensions.
3. Rewrite the fee policy and publish the fee schedule.
4. Revise the Notice of Privacy Practices and retire the acknowledgment step where the rule allows.
5. Update identity checks so they are proportionate.
6. Inventory business associate agreements and plan amendments.
7. Train front desk and records staff, and keep minimum necessary practice in place.

What it means for doctors and practice managers

Fifteen calendar days leaves little room for paper handoffs. Patient portals and standards-based app access become the cheapest way to comply, and in-portal access cannot carry a fee. Review any agreement with a release-of-information vendor for turnaround terms. Technical teams handling identifiers in notes may also find clinical text de-identification relevant.

Frequently asked questions

- **When does the HIPAA Privacy Rule final rule take effect?** 19 January 2027, with compliance by 19 July 2027.
- **How fast must records be provided?** Within 15 calendar days, with a possible extension of up to 30 days.
- **Did HHS relax the minimum necessary standard for care coordination?** No. The proposed exception was not adopted.
- **Must patients still sign the privacy notice acknowledgment?** The rule removes that requirement for direct treatment providers.

Related reading

- Clinical text de-identification
- Gemini for healthcare prior authorisation agents
- GUI agents for EHR workflows
- Certified Technical Practitioner

> Related credential: Certified Technical Practitioner. Explore the exam facts and syllabus.

Sources and further reading

1. US Department of Health and Human Services, Office for Civil Rights. HIPAA Privacy Rule: Changes To Support Coordinated Care and Individual Engagement and Reduce Regulatory Burdens. Final rule, 91 FR 74848. 19 November 2026. federalregister.gov/documents/2026/11/19/2026-23429/hipaa-privacy-rule-changes-to-support-coordinated-care-and-individual-engagement-and-reduce

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