

TRAINING PROGRAM: USES, DISCLOSURES, AND SAFEGUARDING PROTECTED HEALTH INFORMATION POLICY

RESPONSIBILITY: Privacy Official or Designee(s)

BACKGROUND:

Behavioral Health and Health Facilities (BHHF) has instituted a number of policies, procedures and practices intended to improve the privacy of protected health information (PHI), in accordance with federal and state law and regulations.

POLICY:

All members of the BHHF workforce, including temporary staff, students, and volunteers, will receive training in the policies and procedures that apply to their jobs, including maintenance of the privacy and security of protected health information.

New members of the workforce will receive training as part of orientation to their jobs, and to BHHF, within a reasonable time of joining the workforce.

All members of the workforce will receive additional training as policies and procedures are changed, to the extent that the changes affect their jobs.

Attendance at training sessions will be documented to demonstrate that each member of the workforce has received training in accordance with this policy. The documentation must be retained for six years or longer if required by state law or regulation.

Business associates will also receive privacy and security training as appropriate to their level of access to protected health information.

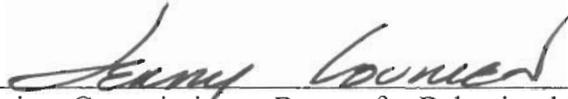
Training sessions will include the following:

1. Awareness training: threats to the privacy and security of protected health information, how failure to protect against these threats can harm patients/residents, and the importance of each member of the workforce in the privacy and security of BHHF.
2. Details of applicable policies and procedures: how privacy and security policies affect the job of each member of the workforce, and how they define what is expected of each of these workers.
3. Periodic reminders.

4. Timely information about changes in policies and procedures.
5. Information about sanctions: how members of the workforce may be sanctioned under BHHF policy, and under state and federal law, for breaches of privacy and security policies.
6. Testing: to measure comprehension and retention of the material.

Effective Date: 4/14/03

Revised Dates:



Jerome E. Lovrien, Commissioner, Bureau for Behavioral Health and Health Facilities