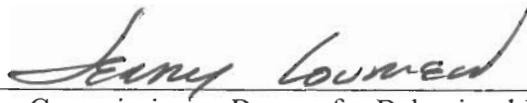


TRAINING PROGRAM: USES, DISCLOSURES, AND SAFEGUARDING PROTECTED HEALTH INFORMATION PROCEDURE

1. The Privacy Official or Designee(s) will Develop and maintain a privacy and security-training program for members of the workforce. This will include Privacy Awareness Training on the DHHR Intranet, Audio Recording of presentation done by Assistant Commissioner of Quality Initiatives to accompany a power point slide presentation, and a video tape.
2. The program will include members of the workforce at Behavioral Health and Health Facilities (BHHF) Hospital, and will include business associates, as necessary and appropriate to their duties and access to PHI.
3. The training program will include procedures to document the training given each Workforce member in that worker's personnel record. Documentation of business associate training will be filed with the business associate's contract.
4. The program will include follow-up procedures to assure that all members of the workforce have been included in training.
5. The Privacy Official or Designee(s) will notify the Assistant Commissioner for Resource Planning and Development whenever a material change in policies and procedures occurs, and they will develop new training materials that incorporate the change.
6. All affected members of the workforce will be trained in material changes to policies and procedures related to privacy and security of PHI prior to the effective date of the change. If this is not possible, the training will take place within a reasonable period of time after the change takes effect. Training in changed policies and procedures will be documented.
7. The Privacy Official or Designee(s) will retain all training materials for six years or longer if required by state law or regulation after the date they are superseded by revised materials.
8. The Privacy Official or Designee(s) will retain documentation of training for each member of the workforce who receives training in accordance with this policy, for six years or longer if required by state law or regulation.

REFERENCE: 45 CFR § 164.530(b) and NPRM 45 CFR §§ 142.308(a)(12) and (b)(6)

Effective Date: 4/14/03
Revised Dates:

A handwritten signature in cursive script, reading "Jerome E. Lovrien". The signature is written in black ink on a light-colored background.

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