

Effective Date: 7/17/2013, 4/14/2003, Motion #03-013  
Revised Date: 3/1/2018  
Review Date: 3/1/2018

## North Sound Behavioral Health Organization

### Section 2500 – Administrative: Training of the Workforce

Authorizing Source: 45 CFR 164 (HIPAA); 42 CFR Part 2 (Part 2); RCW 70.02

Cancels:

See Also:

Responsible Staff: Privacy Officer

Executive Director's Signature:

Approved by: Board of Directors

Motion #: 03-013

Date: 4/14/2003

Date: 3/6/2018

## POLICY #2520.00

**SUBJECT: TRAINING OF THE WORKFORCE**

### PURPOSE

In compliance with Health Insurance Portability and Accountability Act (HIPAA), Part 2 and Washington law, this policy sets out the requirements for Workforce training on the privacy, security and incident/Breach reporting, response and investigation practices of North Sound Behavioral Health Organization (North Sound BHO).

Capitalized terms have specific meanings. Defined terms in this policy include Individual, Protected Health Information (PHI) and Workforce. See Policy 2502.00: Definitions for Policies Governing PHI.

### POLICY

North Sound BHO will require all Workforce to be trained on its privacy, security and incident/Breach reporting, response and investigation policies, procedures and practices, including appropriate use and disclosure of PHI, facilitating rights of Individuals and safeguarding PHI, as necessary and appropriate for Workforce to carry out their functions.

### PROCEDURES

1. **Training.** North Sound BHO shall provide or arrange for training for its Workforce as necessary and appropriate to carry out their functions and to comply with HIPAA, Part 2 and Washington law.
2. **Timing of Training**
  - 2.1. **Orientation.** As a part of its orientation process or within a reasonable time after the Workforce member is hired or otherwise begins providing services to North Sound BHO, North Sound BHO through its Privacy Officer will train Workforce members (including full- and part-time employees, interns and volunteers) in North Sound BHO's privacy policies, procedures and practices.
  - 2.2. **Changes to Privacy Practices.** Whenever there are material changes to North Sound BHO's privacy policies, procedures and practices, the Privacy Officer will determine the Workforce groups affected by the changes and coordinate the training of those Workforce members.

- 2.3. **Changes in Functions.** The Privacy Officer will determine and coordinate training for Workforce members whose job functions change in a manner that requires additional training.
- 2.4. **Periodic Updates.** North Sound BHO will provide or arrange for refresher training on an approximately annual basis. North Sound BHO, from time to time, will provide or arrange for awareness training and reminder training.
3. **Targeted Training.** North Sound BHO will train Workforce in accordance with their role at North Sound BHO and their functions with regard to PHI.
4. **Failure to Successfully Complete Training.** Workforce members who fail to fulfill their training obligations will be subject to disciplinary action, up to and including termination, in accordance with North Sound BHO's disciplinary processes.
5. **Documentation.** All trainings will be documented as to content and attendance. Documentation retention requirements for this policy include:
  - 5.1 **Policies and procedures for Workforce training;**
  - 5.2 **Evidence that trainings were developed and presented to the Workforce; and**
  - 5.3 **Attendance, dates, and topics of training.**
6. **Related Policies.** All North Sound BHO's privacy, security and incident/Breach reporting, response and investigation policies, procedures and practices are related to this policy.

#### **ATTACHMENTS**

None