
PROCEDURE 2520-A

Training related to the Health Insurance Portability and Accountability Act (HIPAA) will be incorporated into the existing training vehicles the organization has, including:

1. The annual training plan
2. Orientation
3. Compliance training

General Requirements

1. All training curriculum developed on privacy practices or the Privacy Rules must be approved by the Privacy Officer.
2. Attendance will be taken at all trainings and attendance logs will be maintained.
3. Attendees will be asked to complete evaluations of all trainings. The evaluations will be reviewed by the trainer or training committee and changes to the curriculum will be made based on these evaluations.
4. All handouts will include information on how to contact the Privacy Officer and where to get additional information.
5. Copies of all attendance logs, handouts, slides and curriculum, and evaluations will be kept in the files of the Privacy Officer/designee for six years from the date of the training.
6. Internal audits of personnel files will occur on a regular basis to monitor compliance with training.
7. Workforce members who fail to attend training may be subject to the agency's "Progressive and Corrective Discipline" policy.

Training the Current Workforce

The North Sound Mental Health Administration (NSMHA) Privacy Officer/designee has developed, and will continue to develop/update as changes occur, a training plan for training the current workforce on the organization's privacy practices and the HIPAA Privacy Rules. This training plan shall include, at a minimum, the following:

1. An analysis and recommendations for role-based training curriculum, so that groups of like employees can be targeted for appropriate levels of detail and scope of responsibilities. For example, all support staff may be able to be together in one training;
2. A timeline for developing the curriculum for each group of employees, including training dates and times, locations, type of training (e.g. on-line, workshop, self-study), primary person responsible for developing the curriculum, dates handouts and curriculum are to be handed in, suggested trainers; and
3. Primary persons responsible for organizational training.

Training New Staff

All new staff will be trained on the agency's privacy practices and the HIPAA Privacy Rules within 30 days of employment.

On-going Training

1. Any major changes to the organization's privacy practices or changes to the Privacy Rule that will result in material changes to policy and procedure will require the development and implementation of an amended training plan by the Privacy Officer. This plan may focus on specific programs or can be agency-wide in scope, depending on the changes required.
2. The training methods can vary with the content and can include workshops, self-study modules, on-line training, staff meetings, etc. The trainings must be completed within 30 days after the implementation date for the changes.

The Privacy Officer is encouraged to develop on-going reminders of the organization's privacy practices through poster campaigns, memos, and newsletter.