
HIPAA Training

HIPAA Workforce Training



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Privacy Training

The Regulation

“A covered entity must train all members of its workforce on the policies and procedures with respect to PHI required by this subpart, as necessary and appropriate for the members of the workforce to carry out their function.”

(45 CFR 164.530(b))

Deadlines

- ◆ Training must be provided:
 - ❖ No later than April 14, 2003 (2004 for small health plans)
 - ❖ To new hires within a reasonable period
- ◆ Retraining must be provided
 - ❖ After change in job functions
 - ❖ After change in policies and procedures



Documentation

- ◆ Training must be documented--
 - ❖ Maintained in written or electronic form for 6 years.
- ◆ What is not required
 - ❖ Employee acknowledgment or certification
 - ❖ Refresher training



What The Regulation Requires

- ◆ The security requires security awareness and training for all personnel, including management, with the following “addressable” implementation specifications:
 - ❖ Periodic security reminders
 - ❖ Education on virus (“malicious software”) protection
 - ❖ Log-in monitoring
 - ❖ Password management
- (45 CFR 142.308(a)(5))

Who Must be Trained?

◆ Privacy

❖ Workforce must be trained

- Employees
- Volunteers
- Students
- Independent contractors with assigned workstations (if CE chooses)

❖ What about others?

- Medical staff
- Business associates

Who Must be Trained?

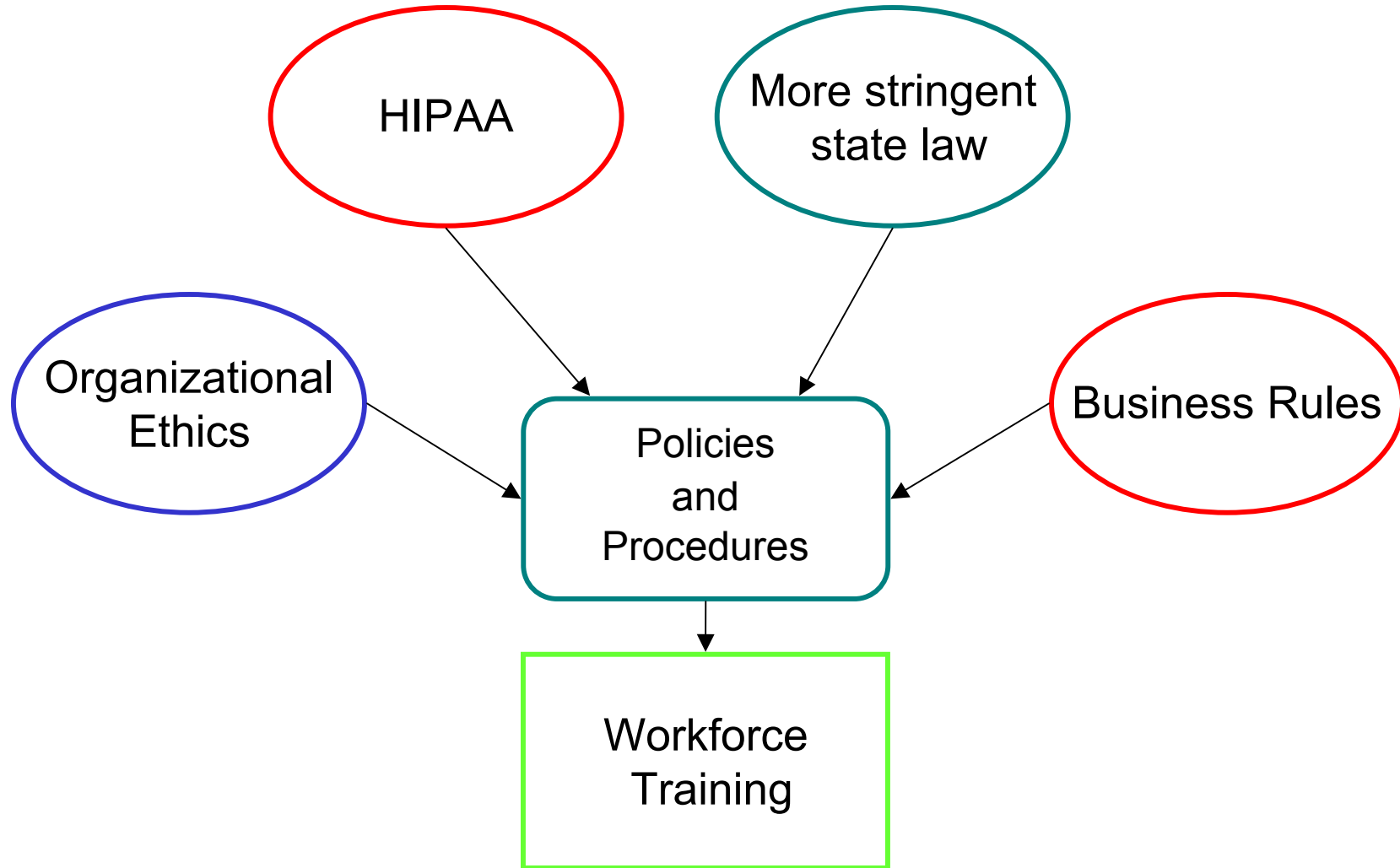
◆ Security

- ❖ Was employees, agents and contractors, now just workforce (including management).
- ❖ Role-based training optional.
- ❖ Contractors must be aware of security policies, but do not need training.

Policy and Procedure Training

- ◆ Responsibility of Privacy Official is “development and implementation of the policies and procedures of the entity.”
- ◆ Cover—
 - ❖ Privacy administration
 - ❖ Physical protection
 - ❖ Technical safeguards
 - ❖ Use and disclosure
 - ❖ Sanctions and mitigation
 - ❖ Individual rights

Policy and Procedure Development





Policy and Procedure Development

- ◆ A HIPAA-Based Policy:

“We restrict the use and disclosure of all individually identifiable health information. Individually identifiable health information is information that identifies or could be used to identify an individual, and that contains information about the individual’s health condition or health care, including payment for health care.”

- ◆ An Alternative:

“We treat all health care related information as confidential, whether or not it identifies an individual, or could be used to identify an individual.”



Policy and Procedure Training

HIPAA Education

Privacy Awareness Training

Role-Based
Policy and Procedure Training

Requirements

- ◆ Flexible and scalable
- ◆ You decide content and delivery
 - ❖ Classroom instruction
 - ❖ Videos
 - ❖ On-line training
 - ❖ Handbooks
- ◆ One hour per employee, on average