

## HIPAA-09: Training Policy

Effective Date:	12-01-2015	Last Revised:	7-17-2017
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### Scope of Policy

This policy governs HIPAA Privacy and Security Training for **TCS**. All personnel of **TCS** must comply with this policy. Demonstrated competence in the requirements of this policy is an important part of the responsibilities of every member of the workforce.

### Assumptions

- TCS** must comply with HIPAA and the HIPAA implementing regulations concerning the training of workforce members, in accordance with the requirements at § 164.530(b).
- Clear and complete HIPAA training, in combination with appropriate HIPAA awareness resources, can significantly reduce the likelihood of breaches of confidential health information and the likelihood of HIPAA violations.

### Policy Statement

- It is the Policy of **TCS** to provide clear and complete HIPAA training to all members of the workforce, including officers, agents, employees, contractors, temporary workers, and volunteers.
- HIPAA training provided by **TCS** shall include relevant and appropriate aspects of both health data privacy and health data security, as it pertains to **TCS's** operations and to the duties and responsibilities of specific individuals.

### Procedures

- HIPAA training, at minimum, shall include the basics of HIPAA itself; the basics of HIPAA's privacy and security requirements and restrictions; and a review of relevant and appropriate internal Policies and Procedures related to HIPAA and HIPAA compliance.
- HIPAA training shall be provided to all new hires during the new employee orientation period, before new employees are exposed to or work with individually identifiable health information.
- HIPAA training shall be conducted periodically for all employees, but no less than every 12 months.
- All employees will be asked to sign a training verification checklist verifying that such training has been provided.
- Fostering ongoing, continuous HIPAA awareness shall be regarded as a separate type of workforce learning from regular HIPAA training. The designated HIPAA Privacy Official shall be responsible for the development (or acquisition), and deployment of appropriate HIPAA awareness materials to maintain a high level of HIPAA awareness among the workforce. This awareness training should be updated periodically to reflect new cyber security threats.
- HIPAA training resources should aim to develop a general understanding of HIPAA and its requirements and restrictions. HIPAA awareness resources should aim to maintain a high level of HIPAA awareness, evolving security threats and a protective attitude toward confidential data on an ongoing, daily basis.