



SALISH BH-ASO POLICIES AND PROCEDURES

Policy Name: PRIVACY TRAINING FOR AGENCY STAFF

Policy Number: PS904

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PURPOSE

The Salish Behavioral Health Administrative Services Organization (SBH-ASO), in an effort to ensure staff are knowledgeable with the Privacy Rules of Health Insurance Portability and Accountability Act's (HIPAA) Administrative Simplification provisions and 42 CFR Part 2, sets out in this policy to define requirements for training of the Privacy and Security Regulations of the law.

POLICY

SBH-ASO stores protected health information electronically and pays for services electronically so are considered a "covered entity" under HIPAA.

SBH-ASO requires all workforce to be trained on its policies, procedures, and practices for privacy, security, and breach response, including appropriate use and disclosure of Protected Health Information (PHI), facilitating rights of Individuals, and safeguarding PHI, as necessary and appropriate for workforce to carry out their functions.

PROCEDURE

1. **Training** – SBH-ASO shall provide or arrange for training of its workforce as necessary and appropriate to carry out their functions and to comply with HIPAA, 42 CFR Part 2, Washington Law, and applicable Business Associate Agreements.
2. **Timing of Training**
 - a. **Orientation** – As part of its orientation process or within a reasonable time after the workforce member is hired or otherwise begins providing services for SBH-ASO, within ninety (90) days of hire, the SBH-ASO through its Privacy Officer will train workforce members (including, but not limited to,

- full- and part-time employees, interns and volunteers) in SBH-ASO privacy, security and breach policies, procedures and practices.
- b. **Changes to Privacy Practices** – Whenever there are material changes to SBH-ASO’s privacy policies, procedures and practices, the Privacy Officer will determine the workforce members affected by the changes and coordinate the training of those workforce members.
 - c. **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.
 - d. **Periodic Updates** – SBH-ASO will provide or arrange for refresher training for SBH-ASO Staff on an annual basis.
3. **Targeted Training** – SBH-ASO will train workforce members in accordance with their role at the SBH-ASO and their functions with regards to PHI.
 4. **Failure to Successfully Complete Training** – Workforce members who fail to fulfill their training obligations will be subject to disciplinary processes.
 5. **Documentation** – All trainings will be documented as to content and attendance. Documentation shall be retained for at least ten (10) years and shall include:
 - a. Policies and procedures for workforce training.
 - b. Evidence that trainings were developed and presented to the workforce.
 - c. Attendance, dates and topics of training.