

Great Rivers Behavioral Health Administrative Services Organization

Policy Title: **Training of Workforce**

Policy No. **5017.00**

Category: Privacy & Security

Date Adopted: 1/10/2020

Date Revised:

Date Reviewed:

Reference: Washington Health Care Authority Contract with Great Rivers Behavioral Health
Administrative Services Organization
45 CFR 164.530; 45 CFR 164.308

POLICY:

- 1.1. Great Rivers Behavioral Health Administrative Services Organization (Great Rivers BH-ASO) will provide training on Great Rivers BH-ASO's Privacy Practices to all of Great Rivers BH-ASO's workforce members (full and part time employees, interns, and volunteers).
- 1.2. All staff will be trained generally and as relevant to their role at Great Rivers BH-ASO and their functions with regard to Protected Health Information (PHI) as part of their orientation.
- 1.3. Whenever there are material changes to Great Rivers BH-ASO's Privacy Practices, the Privacy Officer will determine the workforce groups affected by the changes and notify relevant staff as well as coordinate the training of those groups, as needed.
- 1.4. All trainings presented will be documented as to content and attendance.
- 1.5. Workforce members who fail to attend their assigned trainings will be subject to sanction for breach of Privacy Practices.
- 1.6. Documentation retention requirements include:
 - 1.6.1. Policies and procedures for workforce training; and
 - 1.6.2. Evidence that trainings were presented to the workforce.

PROCEDURE:

- 2.1. Training of Workforce
 - 2.1.1. Health Insurance Portability and Accountability Act (HIPAA) training will be incorporated into Great Rivers BH-ASO's existing training processes, including:
 - 2.1.1.1. The annual training plan
 - 2.1.1.2. Orientation within 30 days or prior to exposure to PHI, whichever is sooner
 - 2.1.1.3. Compliance training
- 2.2. General Requirements
 - 2.2.1. All training curriculum developed for Privacy Practices or the Privacy Rules must be approved by the Privacy Officer.
 - 2.2.2. Attendance will be taken at all trainings.
 - 2.2.3. 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.

- 2.2.4. All handouts will include information on how to contact the Compliance, Security and Privacy Officers and where to get additional information.
- 2.2.5. Copies of all attendance sheets, handouts, slides and curriculum, and evaluations will be kept in the files of the Privacy Officer or designee for six years from the date of the training.
- 2.3. Training the Current Workforce
 - 2.3.1. The Privacy Officer will develop a training plan for training the current workforce on the Great Rivers BH-ASO Privacy Practices and the HIPAA Privacy Rule, as well as other relevant topics on an annual basis. Great Rivers BH-ASO utilizes the Relias training system for HIPAA trainings.
- 2.4. Training New Staff
 - 2.4.1. All new staff will be trained on the agency's Privacy Practices and the HIPAA Privacy Rule within 30 working days of employment.
- 2.5. On-going Training
 - 2.5.1. 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 a 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.
 - 2.5.2. The training methods can vary with the content and may include workshops, self-study modules, on-line training, staff meetings and so forth. The trainings should be completed within 30 working days after the implementation date for the changes.
 - 2.5.3. The Privacy Officer is encouraged to develop on-going reminders of the organization's Privacy Practices through poster campaigns, memos, and newsletters.

POLICY SIGNATURE

Edna J. Fund, Chair
Great Rivers BH-ASO Governing Board

Date

