
SUBJECT: TRAINING

GENERAL STANDARD (PRIVACY RULE SECTION 164.530(b)):

AHS must train all members of its workforce on its General Standards and Guidelines with respect to PHI, as required by the Privacy Rule. AHS must provide such training as is necessary and appropriate for the members of its workforce to carry out their functions within AHS.

PRIVACY RULE:

I. Workforce Training Requirements.

- A. A CE must provide training to all members of its workforce as follows:
 - 1. To each member of the CE's workforce by no later than the compliance date for the CE;
 - 2. Thereafter, to each new member of the workforce within a reasonable period of time after the person joins the CE's workforce; and
 - 3. To each member of the CE's workforce whose functions are affected by a material change in the policies or procedures required by the Privacy Rule, within a reasonable period of time after the material change becomes effective.

II. Training Documentation Requirements.

- A. A CE must maintain a written or electronic record that the training required by the Privacy Rule has been provided to members of the CE's workforce.
 - B. A CE must retain such documentation for six (6) years from the date of its creation or the date when it last was in effect, whichever is later.
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GUIDELINES:

Training Applicable to AHS State of Vermont Employees, Interns, Volunteers, and Temporary Workers

- 1. AHS has, and will continue, to train all workforce members, as is necessary and appropriate for such members to carry out their duties and responsibilities, in the proper use and disclosure of PHI and the Privacy Standards and Guidelines implemented by AHS.
- 2. AHS will require that all new workforce members undergo privacy training within four weeks after beginning work with AHS. These persons will receive such training as part of their new employee orientation.

3. AHS will require all employees to retake the privacy training every two years.
4. The Privacy Official or his/her designee will oversee all privacy training materials and utilize AHS Learning Management Services for conducting trainings.
5. Such training will address the following:
 - A. Uses and disclosures of PHI for treatment, payment, and health care operations.
 - B. Uses and disclosures of PHI pursuant to authorization.
 - C. The minimum necessary rule.
 - D. Violations of HIPAA and procedures for reporting violations.
 - E. Individual rights.
 - F. Proper communication with co-workers and people outside of AHS.
 - G. Security measures.
 - H. Any other information as necessary and appropriate for the respective members of the workforce to carry out their duties and responsibilities with respect to the proper use and disclosure of PHI.
6. AHS will keep records to confirm that its workforce members received training, and will keep copies of the training materials used. This documentation will be retained for six (6) years from the date of its creation or the date when it last was in effect, whichever is later.