

Original Draft Date: January 13, 2003
Last Revision Date: July 2016

SUBJECT: Training of Workforce Members on the Organization's Policies and Procedures With Respect to Protected Health Information

HIPAA CITES: 45 CFR §164.530(b)

DEPARTMENT: All Departments of Kewaunee County

POLICY NUMBER: 122

I. POLICY:

Kewaunee County trains employees and other members of its workforce concerning Kewaunee County's policies and procedures regarding the privacy of Protected Health Information, as necessary and appropriate for the workforce member to carry out his or her specific functions in Kewaunee County in accordance with state and federal law. To the extent that there is not a Business Associate Contract, it will be assumed that any contracted individual is a member of Kewaunee County workforce.

II. PROCEDURES:

- A. Current Members of Workforce. Kewaunee County will provide training to all current workforce members no later than April 14, 2003, which is the date that compliance is required with the Privacy Rule. All workforce members are required to attend such training programs. Kewaunee County will take attendance to ensure that all employees have received such training.
- B. New Workforce Members. For a person who joins the workforce after April 14, 2003, Kewaunee County will train any such person concerning Kewaunee County's privacy policies and procedures as part of the person's orientation or otherwise within a reasonable period of time after the date that the person joins the workforce.
- C. Changes in Policies and Procedures Regarding Protected Health Information. Kewaunee County will train each workforce member whose functions are affected by a material change in Kewaunee County's privacy policies and procedures within a reasonable amount of time after the effective date of the change.

- D. Documentation. Kewaunee County will document the time, date, place and content of each training session, as well as the workforce members who attended each training session. The Privacy Officer will maintain such documentation in Kewaunee County's HIPAA compliance files and make it available for inspection by regulatory authorities, as appropriate.

- E. Certifications of Training. Kewaunee County will require all workforce members to execute a Certification of Training and Agreement of Compliance. Kewaunee County will maintain all certifications in its HIPAA compliance files. Kewaunee County will make such certifications available for inspection by regulatory authorities, as appropriate.