

TITLE: Workforce Health Insurance
Portability and Accountability Act
(HIPAA) Mandatory Training and
Informa

Policy Number: AM-HP-004

STATEMENT OF PURPOSE:

Establishes a uniform process for ensuring that all employees, contractors, interns, and volunteers are provided with HIPAA training and access to the Agency's policies and procedures, including all HIPAA-related policies.

POLICY:

Neighbor To Family assures the privacy and confidentiality of Protected Health Information (PHI) of all clients and shall not permit the unauthorized disclosure of PHI except as permitted or required by state and federal law. All Neighbor To Family employees, contractors, interns, and volunteers are provided HIPAA training and access to the Agency's policies and procedures, including all HIPAA-related policies.

PROCEDURE:

Training Requirements

1. All Neighbor To Family employees, contractors, interns, and volunteers must attend HIPAA training. Their attendance and evidence of participation shall be documented in accordance with the Staff Development Record Keeping policy.
2. All Neighbor To Family employees, contractors, interns, and volunteers shall attend the HIPAA training within the first thirty (30) days of employment and annually thereafter.
3. All Neighbor To Family employees, contractors, interns, and volunteers shall be furnished with information regarding how to access all applicable HIPAA-related policies and procedures. All applicable policies must be read to ensure compliance. All employees, contractors, interns, and volunteers shall sign a copy of the Notice of Privacy indicating they have read and understand the material and that a copy of the signed Notice shall be maintained in the individual's personnel file.

4. Contractors must show evidence of general orientation and education regarding HIPAA, which may be accomplished by attendance at educational programs approved by Neighbor To Family but offered by the contractor, and review and sign the Neighbor To Family Business Associate Agreement. The signed Agreement will be maintained at the Corporate Human Resources Department with a copy to the contractor.

Guidelines

1. Vice Presidents of Programs and/or the Executive Directors are responsible for ensuring all employees, contractors, interns, and volunteers attend and complete the required training and have their attendance documented.
2. If the employee is unable to attend the HIPAA training within the first thirty (30) days of employment, they must attend the next scheduled HIPAA training.
3. Neighbor To Family provides an institutional database for inputting and maintaining training information. The Director of Training is responsible for reviewing the database to ensure that employees, contractors, interns, and volunteers have participated in and completed all applicable training. Quarterly reports will be provided to the Vice Presidents of Programs and/or the Executive Directors to ensure training requirements are met.
4. In the event an employee does not comply with the mandated training, the employee will be subject to the appropriate and applicable disciplinary process, up to and including termination.

Accessibility of Materials

1. The Notice of Privacy Practices, Management of Protected Health Information and Related Client Rights policy, and all other related policies and forms are available on the Neighbor To Family web site or will be made available in alternative formats upon request.